Management's Report of the 2024 results of the OTP Bank (separate)

In accordance with the recommendation stated in the current circular of the MNB on the application of MoF Decree no. 24/2008 on the detailed rules regarding the disclosure requirements applicable to publicly offered securities, OTP Bank Plc. as issuer prepares and publishes this Management Report combined with the Business Report required in the Accounting Act in a single document, stating in dedicated chapters the subjects required in the MoF Decree.

SEPARATE STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2024 (in HUF million)

	Note	31 December 2024	31 December 2023
Cash, amounts due from banks and balances with the National Bank of Hungary	5	2,075,179	2,708,232
Placements with other banks	6	2,948,536	2,702,433
Repo receivables	7	238,079	201,658
Financial assets at fair value through profit or loss	8	651,236	257,535
Financial assets at fair value through other comprehensive income	9	592,602	559,527
Securities at amortised cost	10	3,334,145	2,710,848
Loans at amortised cost	11	4,670,795	4,681,359
Loans mandatorily measured at fair value through profit or loss	11	998,410	934,848
Investments in subsidiaries	12	2,169,031	2,001,952
Property and equipment	13	111,772	107,306
Intangible assets	13	137,860	98,115
Right of use assets	35	58,956	66,222
Investment properties	14	4,227	4,203
Deferred tax assets	34	-	408
Current tax assets	34	-	-
Derivative financial assets designated as hedge accounting relationships	15	43,130	21,628
Non-current assets held for sale	46	-	130,718
Other assets	16	357,095	365,961
TOTAL ASSETS		**18,391,053**	**17,552,953**
Amounts due to banks and deposits from the National Bank of Hungary and other banks	17	1,606,969	1,761,579
Repo liabilities	18	227,632	443,694
Deposits from customers	19	10,891,924	10,734,241
Fair value changes of the hedged items in portfolio hedge of interest rate risk	19	4,303	84
Leasing liabilities	35	64,380	68,282
Liabilities from issued securities	20	1,750,893	1,163,109
Financial liabilities designated at fair value through profit or loss	21	17,024	19,786
Derivative financial liabilities designated as held for trading	22	144,499	183,565
Derivative financial liabilities designated as hedge accounting relationships	23	19,438	27,423
Deferred tax liabilities	34	1,707	-
Current tax liabilities	34	23,591	14,393
Provisions	24	25,647	22,497
Other liabilities	24	449,522	295,399
Subordinated bonds and loans	25	362,271	520,296
TOTAL LIABILITIES		**15,589,800**	**15,254,348**
Share capital	26	28,000	28,000
Retained earnings and reserves	27	2,896,319	2,276,759
Treasury shares	28	(123,066)	(6,154)
TOTAL SHAREHOLDERS' EQUITY		**2,801,253**	**2,298,605**
TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY		**18,391,053**	**17,552,953**

SEPARATE STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED 31 DECEMBER 2024 (in HUF million)

	Note	Year ended 31 December 2024	Year ended 31 December 2023
Interest Income			
Interest income calculated using the effective interest method	29	1,040,534	1,227,173
Income similar to interest income	29	585,619	795,906
Interest income and similar to interest income total		**1,626,153**	**2,023,079**
Interest Expense			
Interest expenses total	**29**	**(1,107,551)**	**(1,556,361)**
NET INTEREST INCOME		**518,602**	**466,718**
(Loss allowance)/Release of loss allowance on loan, placement and repo receivables losses	6, 7, 11, 30	(19,955)	8,616
(Loss allowance)/Release of loss allowance on securities at fair value through other comprehensive income and on securities at amortised cost	9, 10, 30	(35,128)	11,879
(Provision)/Release of provision for loan commitments and financial guarantees given	24, 30	(2,565)	7,172
Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss	45.4	4,193	(980)
Risk cost total		**(53,455)**	**26,687**
NET INTEREST INCOME AFTER RISK COST		**465,147**	**493,405**
LOSSES ARISING FROM DERECOGNITION OF FINANCIAL ASSETS MEASURED AT AMORTISED COST		**(9,856)**	**(19,707)**
MODIFICATION LOSS	**4**	**(1,999)**	**(9,017)**
Income from fees and commissions	31	468,566	402,885
Expenses from fees and commissions	31	(92,217)	(78,755)
NET PROFIT FROM FEES AND COMMISSIONS		**376,349**	**324,130**
Foreign exchange losses	32	(6,885)	(12,269)
Gains on securities, net	32	120,863	7,073
Gains on financial instruments at fair value through profit or loss	32	27,377	91,268
Net results on derivative instruments and hedge relationships	32	(6,063)	13,055
Dividend income	32	413,262	275,705
Other operating income	33	18,380	26,184
Other operating expenses	33	(37,072)	63,590
NET OPERATING INCOME		**529,862**	**464,606**
Personnel expenses	33	(200,268)	(195,404)
Depreciation and amortization	33	(63,551)	(50,814)
Other administrative expenses	33	(284,128)	(281,918)
OTHER ADMINISTRATIVE EXPENSES		**(547,947)**	**(528,136)**
PROFIT BEFORE INCOME TAX		**811,556**	**725,281**
Income tax expense	34	(66,557)	(70,293)
PROFIT AFTER INCOME TAX		**744,999**	**654,988**
Earnings per share (in HUF)			
Basic	43	2,692	2,344
Diluted	43	2,692	2,344

SEPARATE STATEMENT OF COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2024 (in HUF million)

	Note	Year ended 31 December 2024	Year ended 31 December 2023
PROFIT AFTER INCOME TAX		**744,999**	**654,988**
Items that may be reclassified subsequently to profit or loss:			
Fair value adjustment of debt instruments at fair value through other comprehensive income		9,751	37,917
Deferred tax related to fair value adjustment of debt instruments at fair value through other comprehensive income	34	(848)	(3,503)
Gains/(Losses) on separated currency spread of financial instruments designated as hedging instrument		(359)	3,752
Deferred tax related to (losses)/gains on separated currency spread of financial instruments designated as hedging instrument	34	32	(338)
(Losses)/Gains on derivative financial instruments designated as cash flow hedge		136	5,700
Deferred tax related to gains on derivative financial instruments designated as cash flow hedge	34	-	-
Items that will not be reclassified to profit or loss:			
Gains on equity instruments at fair value through other comprehensive income		-	-
Fair value adjustment of equity instruments at fair value through other comprehensive income		11,547	3,308
Deferred tax related to equity instruments at fair value through other comprehensive income	34	(1,305)	(374)
Total		**18,954**	**46,462**
TOTAL COMPREHENSIVE INCOME		**763,953**	**701,450**

POST-BALANCE SHEET EVENTS

Post-balance sheet events cover the period until 21 February 2025.

Hungary

- On 13 January 2025 OTP Bank's share buy-back program approved by the central bank on 22 August 2024 reached its maximum available amount of HUF 60 billion.
- On 24 January 2025 the Bank got another approval from the Hungarian National Bank to repurchase own shares in the amount of HUF 60 billion. The available amount was exhausted on 10 February 2025.
- From 13 January 2025 the consolidated MREL requirement is determined at 18.60% of the total risk exposure amount (RWA) and 6.02% of the total exposure measure (TEM) of the Resolution Group. The consolidated MREL requirement of OTP Bank applicable until this date was 18.94% and 5.78%.
  OTP Bank's Resolution Group consists of entities included in the prudential scope of consolidation of OTP Bank without the Slovenian OTP banka d.d. and its subsidiaries. Pursuant to the CRD OTP Bank has to meet the combined buffer requirement in addition to its MREL TREA requirement as institutions shall not use CET1 capital that is maintained to meet the combined buffer requirement to meet the risk-based component of the MREL requirement. This principle is applicable to the MREL TREA subordination requirement as well.
- On 30 January Tier2 notes have been issued in the aggregate nominal amount of USD 750 million. The notes carry an annual coupon of 7.3% due semi-annually. The tenor was 10.5NC5.5, i.e. in the period between five and five and a half years the bonds can be redeemed on any day. The notes were listed on the Luxembourg Stock Exchange.
- On 7 February the EUR 500 million Fixed to Floating Rate Perpetual Subordinated Notes have been redeemed and the principal amount, together with accrued and unpaid interest was paid to the holders of the Notes.
- On 17 February OTP Bank announced the redemption of its €650,000,000 7.350 per cent. Senior Preferred Fixed-to-Floating Callable Notes due 2026 with the optional redemption date of 4 March 2025.
- As of end of February, the banking sector related key initiatives of the 'New Economic Policy Action Plan' launched by government decree 1311/2024 (X. 21.), are as follows (based on the communication of the Government and submitted bills):
  - From 1 January 2025, minimum wage increased by 9%. For 2026 and 2027 further 13% and 14% hikes have been agreed as part of the three-year wage agreement, assuming that economic growth and inflation will be in line with the expectations.
  - From 2 January 2025 the Workers' Loan Program is available at Hungarian banks. The loan is designed for young people aged 17–25 who are not eligible for student loans and who are employed in Hungary for at least 20 hours a week, or entrepreneurs who have an average income and undertake to work or run a business in Hungary for a minimum of five years. The maximum amount of the interest-free, free use, state-guaranteed loan facility is HUF 4 million, with a term of 10 years. The scheme also provides support for childbearing, with repayments suspended for two years following the birth of the first and second child, and half of the current debt waived for the second child and the full debt waived after the third one.
  - From 1 January 2025, in case of green loans the loan-to-value limit was increased to 90%, furthermore the payment-to-income limit was increased to 60% regardless of the income.
  - On 1 January 2025, the home renovation program was reintroduced to support families in towns with less than 5,000

residents, covering up to 50% of labor- and material costs with a cap of HUF 3 million. Those who have already availed themselves of the 2021–2022 home renovation subsidy are only eligible to utilize the new subsidy up to the amount of the HUF 3 million that remains unused at that time. From 1 February 2025, a state subsidized home renovation mortgage loan with a client interest rate of 3% and with up to HUF 6 million loan amount is available to finance investment costs.
- In 2025, voluntary pension fund savings can be used free of tax for housing loan repayments, repayment of secured loans, and modernization or renovation of existing homes. The total amount of voluntary pension savings could be utilized, but only up to the balance available as of 30 September 2024.
- From 1 January 2025, monthly HUF 150,000 fringe benefit can be paid to the employees under the age of 35 in order to support housing expenses (home rental or loan installment) above the current preferential upper limit of HUF 450,000 per year.
- Half of the accumulated amount on SZÉP Cards can be used for home renovation in 2025.
- Between 1 April and 31 October 2025, based on the individual decision of the participating banks, 5% interest rate cap will be available for under 35 years old, first-time home buyers for newly granted green housing loans, with properties under 60 square meter and price lower than HUF 1.2 million per square meter. The rate cap will be applied in the first 5 years of the loan, the product has neither disbursement nor credit assessment fees.
- From 6 January 2025, as part of the Demján Sándor program, export stimulating loan and leasing structures are available in the total sum of HUF 400 billion, partly refinanced by EXIM Hungary. Some of the products are also available for enterprises planning to start export activities in the future.
- The interest rate of certain products under the Széchenyi Card Program MAX+ scheme was significantly reduced for contracts concluded after 1 March 2025: the interest rate on investment loans (Agricultural Investment Loan, Investment Loan) and the leasing scheme was reduced to 3%, while the interest rate on the Széchenyi Card Overdraft MAX+ (including the Tourism Card) and the Liquidity Loan was reduced to 4.5%. The uniform 0.5 pp reduction in client interest rates was facilitated by the burden sharing of KAVOSZ Ltd. (0.1 pp) and the banking sector (0.4 pp).
  The investment loans with the exceptionally favorable interest rate of the "GREEN" sub-structure are an exception to this, which are still available to businesses with a rate of 1.5%.

- Changes in the economic policy leadership:
  - As of 31 December 2024, pursuant to Act LXXXVI of 2024, the Ministry of Finance ceased to exist by merging into the Ministry of National Economy. Minister Márton Nagy remained in office unchanged as head of the Ministry of National Economy.
  - As of 4 March 2025, the President of the Republic appointed Mihály Varga, the former Minister of Finance, to head the National Bank of Hungary.
- Based on preliminary data published by the Central Statistical Office on 30 January 2025, the performance of the Hungarian economy increased by 0.5% q-o-q and 0.4% y-o-y in the fourth quarter. With this, the annual growth in 2024 was 0.6%. The average inflation in 2024 was 3.7%.
- The Financial Stability Council of the Hungarian National Bank announced an extension to the central bank's green capital requirement relief programs for credit institutions. The deadline for these programs was extended by one year, until the end of December 2026. The decision on whether to grant further annual extensions will be made based on a professional indicator system. Additionally, from 31 January 2025, the range of exposures that can be included in the discount program was further expanded.

An event, that occurred in January 2025 regarding an item reported in the Group's books as a receivable from lending activities, was identified by the Group as a post-balance sheet event. The Group believes that the event has no retrospective effect for 2024 concerning Stage classification, therefore the Group did not change the Stage 2 classification of the affected receivable as of 31 December 2024. However, given that the Group obtained additional information regarding the circumstances that previously justified the Stage 2 classification, the Group recognized an additional HUF 13.9 billion impairment loss for the receivable in the Stage 2 category for 2024.

MAIN CHANGES CONCERNING INVESTMENTS IN SUBSIDIARIES

On 30 July 2024 the financial closure of the sale of the Romanian bank was completed, consequently starting from 3Q the consolidated financial statements no longer include the contribution from the Romanian segment.

On 22 August 2024 the legal merger of the two Slovenian subsidiary banks of the Group, SKB Banka and Nova KBM was successfully completed. Following this, the operational merger was also successfully concluded.

MACROECONOMIC OVERVIEW

In 2024, inflation in advanced economies continued to fall, so the Fed and the ECB both started their interest rate cut cycles. The US presidential election and the expectations ahead of it led to a sharp turnaround in bond markets and interest rate expectations, as the victory of Donald Trump, whose election promises included several highly inflationary elements, became increasingly likely. In mid-September, yields started to rise after a slide since spring, and expectations of further rate cuts began to ease. Growth remained strong in the United States, but the euro area continued to struggle to recover from the crisis, where the energy crisis and the inflation shock of the Russia-Ukraine war had thrown it. Meanwhile, labour markets remained tight on both sides of the Atlantic, with low unemployment and strong wage dynamics.

As the year was nearing its end, it became clear that growth in the US was strong, as consumer spending and private investment continued to drive the growth, and the US economy expanded by 2.8%, well above the 1-1.5% expected at the beginning of the year. Labour market conditions were also more favourable than expected: except for some minor temporary volatility, employment growth remained strong, unemployment remained low, and wages grew by 4%. Disinflation stalled in the autumn, and core inflation was still 3–3.5%, well above the inflation target. Nevertheless, the Fed cut its base rate by 100 bps to 4.25–4.5% by the end of the year, in line with expectations.

In the euro area, the recovery was also driven by consumption, but the pace of the rebound was far below that of the USA and was not homogeneous across the euro area. The best performers were tourism-driven southern member states, while the industry-heavy economies struggled to recover from the shock of the energy crisis. Political crises are also weighing on the recovery, with two major economies, Germany and France, both facing government crises. Inflation temporarily fell below target in the autumn, but has been accelerating again since October as the food and energy price fall fades; still, the ECB continued its interest rate cut cycle, bringing the effective rate down to 3% by the end of 2024, in a 100 basis point cut for the year overall.

The Hungarian economy started to recover in 2024 after a longer and deeper recession than other countries in the region in 2023 but, just like in Europe, it was uneven and fragile, growing by just 0.5% in full year 2024, compared with expectations of around 3% at the start of the year. With rising real wages and low unemployment, consumption gradually picked up, although households' precautionary savings remained high. Despite expanding consumption, the high exposure to the automotive sector, the eroded room for manoeuvre in fiscal policy, the falling exports and a more than 10% drop in investment pushed the economy back into technical recession in the second and third quarters, from which it recovered only in the fourth quarter. Net exports' contribution to growth was positive, but it did not stem from exports' robust performance – it was only because imports fell sharper than exports did. As a result of the government's stimulus measures, the housing market picked up along with household loan demand, while the corporate loan market stagnated. Labour market tensions have clearly eased, as employment declined in the second half of the year, but the unemployment rate did not rise significantly.

Inflation also slowed in Hungary and reached the 3% target in September, giving the MNB room to cut interest rates from 10.75% at the end of 2023 to 6.5%. But inflation picked up in October and the escalation of the Middle East conflict and the rise in US yields forced the MNB to pause the easing cycle. The EUR/HUF was at around 380 at the beginning of 2024, but it rose persistently above the 400 level in the second half of the year.

After years of deficits of 7–8%, the primary balance improved to close to zero in 2024, despite the unfavourable macroeconomic environment, and the headline deficit fell to 4.8% of GDP, close to the increased deficit target, but still far from the 3% Maastricht criterion. The decline in government debt stalled in 2024, with the debt-to-GDP ratio rising to 73.9%–74% from 73.4% in 2023. Hungary's external balance started to improve rapidly after the energy price shock faded and domestic demand declined; the deficit swung from above 8% of GDP in 2022 to a slight surplus in 2023, by rising to 2.5% of GDP in 2024, and external debt started to slowly decline.

DIGITAL AND IT INNOVATIONS

OTP Bank broadens the range of remotely available services continually. The number of our digitally active retail clients has far exceeded 2 million, and most of our clients now contact our Bank through mobile banking. Through the mobile application, in addition to the daily banking functions, our clients can purchase investment funds, bonds, car prize deposits, or apply for a new home savings product or travel insurance. In addition, thanks to the piggy bank function, our customers can set up savings goals and put money aside little by little for it, while selecting 'Split the Bill', they can easily allocate the costs of a dinner among the participants. Daily banking functionality has been recently expanded with the introduction of qvik payment options.

The Bank focuses on the continuous upgrades of the Personal Finance Management (PFM) toolset, which supports our users in making more conscious financial decisions. The expense tracker service is already capable of handling user generated, personalized categories as well.

The constant ascent in the ratio of our digitally active clients is supported by targeted online campaigns and continuous user education.

Machine learning algorithms help the Bank processing all digital data for displaying relevant, personalized offers to the clients.

Several products are available via end-to-end online processes for example: retail clients can open a new account with selfie-identification, or contract for a personal loan or travel insurance digitally. With OTP MobilBank, it takes a few minutes only for parents to open a Junior account for their children under the age of 14.

VideoBank provides consulting service and application process for mortgages as well. We received numerous positive feedback from clients using the channel. Our customers have access to the chat feature on the website, via our internet banking service and in the mobile application as well, therefore we serve client needs also via identified conversations.

We are constantly improving our fraud prevention platform to better identify and prevent fraudulent activity targeting our digital service. As a preventive measure, in 2024 we introduced a new Mobilbank feature, which displays for the customer when OTP Bank's call management system initiates a call.

In addition to our internet and mobile banking developments, we created a so-called Merchant Portal for partners holding card acceptance contracts, where they can reach analytics, statements and all related documents of card transactions made with us.

BRANCH NETWORK OF OTP BANK

The Bank provides a full range of commercial banking services through a nationwide network and its branches are available to customers in Hungary.

1011 Budapest, Iskola utca 38–42.
1015 Budapest, Széna tér 7.
1021 Budapest, Hűvösvölgyi út 138.
1024 Budapest, Fény utca 11–13.
1025 Budapest, Szépvölgyi út 4/B
1025 Budapest, Törökvész út 1/A
1026 Budapest, Szilágyi Erzsébet fasor 121.
1032 Budapest, Bécsi út 154.
1033 Budapest, Flórián tér 15.
1033 Budapest, Szentendrei út 115.
1039 Budapest, Heltai Jenő tér 2.
1041 Budapest, Erzsébet utca 50.
1042 Budapest, Árpád út 63–65.
1048 Budapest, Kordován tér 4.
1051 Budapest, Nádor utca 16.
1052 Budapest, Deák Ferenc utca 7–9.
1054 Budapest, Szabadság tér 7–8.
1055 Budapest, Nyugati tér 9.
1055 Budapest, Szent István körút 1.
1062 Budapest, Váci út 1–3.
1066 Budapest, Oktogon tér 3.
1075 Budapest, Károly körút 1.
1075 Budapest, Károly körút 25.
1076 Budapest, Thököly út 4.
1081 Budapest, Népszínház utca 3–5.
1083 Budapest, Futó utca 37–45.
1085 Budapest, József körút 33.
1085 Budapest, József körút 53.
1085 Budapest, Kálvin tér 12–13.
1094 Budapest, Ferenc körút 13.
1097 Budapest, Könyves Kálmán körút 12–14.
1102 Budapest, Kőrösi Csoma sétány 6.
1103 Budapest, Sibrik Miklós út 30.
1106 Budapest, Örs vezér tere 25.
1115 Budapest, Bartók Béla út 92–94.
1117 Budapest, Hunyadi János út 19.
1117 Budapest, Móricz Zsigmond körtér 18.
1117 Budapest,
Október huszonharmadika utca 8–10.
1119 Budapest, Hadak útja 1.
1123 Budapest, Alkotás utca 53.
1124 Budapest, Apor Vilmos tér 11.
1126 Budapest, Böszörményi út 9–11.
1133 Budapest, Váci út 80–84.
1134 Budapest, Váci út 17.
1135 Budapest, Lehel utca 70–76.
1137 Budapest, Pozsonyi út 38.
1138 Budapest, Váci út 135–139.
1146 Budapest, Thököly út 102/B
1148 Budapest, Nagy Lajos király útja 19–21.
1149 Budapest, Bosnyák tér 17.
1149 Budapest, Fogarasi út 15/B
1152 Budapest, Szentmihályi út 131.
1157 Budapest, Zsókavár utca 28.
1163 Budapest, Jókai Mór utca 3/B
1173 Budapest, Ferihegyi út 93.
1173 Budapest, Pesti út 5–7.
1181 Budapest, Üllői út 377.
1191 Budapest, Üllői út 201.
1191 Budapest, Vak Bottyán utca 75/A–C
1195 Budapest, Üllői út 285.
1203 Budapest, Bíró Mihály utca 7.
1204 Budapest, Kossuth Lajos utca 44–46.
1211 Budapest, Kossuth Lajos utca 86.
1211 Budapest, Kossuth Lajos utca 99.
1221 Budapest, Kossuth Lajos utca 31.
1222 Budapest, Nagytétényi út 37–45.
1238 Budapest, Grassalkovich út 160.
1239 Budapest, Bevásárló utca 2.
2000 Szentendre, Pannónia utca 1–3.
2013 Pomáz, József Attila utca 17.
2030 Érd, Budai út 24.
2030 Érd, Iparos utca 5.
2040 Budaörs, Sport utca 2–4.
2040 Budaörs, Szabadság út 131/A
2060 Bicske, Bocskai köz 1.
2083 Solymár, Szent Flórián utca 2.
2085 Pilisvörösvár, Fő utca 60.
2092 Budakeszi, Fő utca 174.
2100 Gödöllő, Szabadság tér 12–13.
2112 Veresegyház, Fő út 52.
2120 Dunakeszi, Barátság útja 29.
2120 Dunakeszi, Nádas utca 6.
2141 Csömör, Határ út 6.
2151 Fót, Móricz Zsigmond út 23/A
2170 Aszód, Kossuth Lajos utca 42–46.
2200 Monor, Kossuth Lajos utca 67.
2220 Vecsés, Fő út 170.
2220 Vecsés, Fő út 246–248.
2225 Üllő, Pesti út 92/B
2230 Gyömrő, Szent István út 17.
2234 Maglód, Eszterházy János utca 1.
2300 Ráckeve, Szent István tér 3.
2310 Szigetszentmiklós, Ifjúság útja 17.
2330 Dunaharaszti, Dózsa György út 25.
2340 Kiskunlacháza, Dózsa György út 219.
2360 Gyál, Kőrösi út 160.
2370 Dabas, Bartók Béla út 46.
2400 Dunaújváros, Dózsa György út 4/E
2440 Százhalombatta, Szent István tér 8.
2457 Adony, Petőfi Sándor utca 2.
2483 Gárdony, Szabadság út 18.
2500 Esztergom, Rákóczi tér 2–4.
2510 Dorog, Bécsi út 33.
2536 Nyergesújfalu, Kossuth Lajos utca 126.
2600 Vác, Széchenyi István utca 3–7.
2651 Rétság, Rákóczi út 28–30.
2660 Balassagyarmat, Rákóczi fejedelem út 44.
2700 Cegléd, Szabadság tér 6.
2730 Albertirsa, Vasút utca 4/A
2750 Nagykőrös, Szabadság tér 2.
2760 Nagykáta, Bajcsy-Zsilinszky út 1.
2800 Tatabánya, Bárdos László utca 2.
2800 Tatabánya, Fő tér 32.
2840 Oroszlány, Rákóczi Ferenc út 84.
2870 Kisbér, Batthyány tér 5.
2890 Tata, Ady Endre utca 1–3.
2900 Komárom, Mártírok útja 23.
2941 Ács, Gyár utca 14.
3000 Hatvan, Kossuth tér 8.
3021 Lőrinci, Szabadság tér 25/A
3060 Pásztó, Fő utca 73/A
3070 Bátonyterenye, Bányász út 1/A
3100 Salgótarján, Rákóczi út 22.
3170 Szécsény, Feszty Árpád utca 1.
3200 Gyöngyös, Fő tér 1.
3245 Recsk, Kossuth Lajos út 93.
3300 Eger, Törvényház utca 4.
3360 Heves, Hősök tere 4.

3390 Füzesabony, Rákóczi Ferenc út 77.
3400 Mezőkövesd, Mátyás király út 149.
3527 Miskolc, József Attila utca 87.
3530 Miskolc, Rákóczi Ferenc utca 1.
3530 Miskolc, Uitz Béla utca 6.
3535 Miskolc, Árpád út 2.
3580 Tiszaújváros, Szent István út 30.
3600 Ózd, Városház tér 1/A
3630 Putnok, Kossuth út 45.
3700 Kazincbarcika, Egressy Béni út 50.
3770 Sajószentpéter, Bethlen Gábor utca 1/A
3780 Edelény, Tóth Árpád út 1.
3800 Szikszó, Kassai út 16.
3860 Encs, Bem József út 1.
3900 Szerencs, Kossuth tér 3/A
3910 Tokaj, Rákóczi út 37.
3950 Sárospatak, Eötvös út 2.
3980 Sátoraljaújhely, Széchenyi tér 13.
4025 Debrecen, Hatvan utca 2-4.
4025 Debrecen, Pásti utca 1-3.
4025 Debrecen, Piac utca 45-47.
4031 Debrecen, Kishatár utca 7.
4032 Debrecen, Egyetem tér 1.
4032 Debrecen, Füredi út 43.
4060 Balmazújváros, Veres Péter utca 3.
4080 Hajdúnánás, Köztársaság tér 17-18/A
4087 Hajdúdorog, Petőfi tér 9.
4100 Berettyóújfalu, Oláh Zsigmond utca 1.
4110 Biharkeresztes, Kossuth utca 4.
4130 Derecske, Köztársaság út 111.
4150 Püspökladány, Kossuth utca 4.
4181 Nádudvar, Fő út 119.
4200 Hajdúszoboszló, Szilfákalja 6-8.
4220 Hajdúböszörmény, Kossuth Lajos utca 3.
4242 Hajdúhadház, Kossuth utca 2.
4244 Újfehértó, Fő tér 15.
4254 Nyíradony, Árpád tér 6.
4300 Nyírbátor, Zrínyi utca 1.
4320 Nagykálló, Árpád utca 10.
4400 Nyíregyháza, Rákóczi utca 1.
4440 Tiszavasvári, Kossuth Lajos utca 6.
4501 Kemecse, Móricz Zsigmond utca 18.
4561 Baktalórántháza, Köztársaság tér 4.
4600 Kisvárda, Szent László utca 30.
4625 Záhony, Ady Endre út 27-29.
4700 Mátészalka, Szalkay László utca 34.
4765 Csenger, Ady Endre utca 1.
4800 Vásárosnamény, Szabadság tér 33.
4900 Fehérgyarmat, Móricz Zsigmond utca 4.
5000 Szolnok, Nagy Imre körút 2/A
5000 Szolnok, Szapáry utca 31.
5100 Jászberény, Lehel vezér tér 28.
5123 Jászárokszállás, Rákóczi Ferenc utca 4-6.
5130 Jászapáti, Kossuth Lajos út 2-8.
5200 Törökszentmiklós, Kossuth Lajos utca 141.
5300 Karcag, Kossuth tér 15.
5310 Kisújszállás, Szabadság tér 6.
5340 Kunhegyes, Szabadság tér 4.
5350 Tiszafüred, Piac tér 3.
5400 Mezőtúr, Szabadság tér 29.
5420 Túrkeve, Széchenyi utca 32-34.
5430 Tiszaföldvár, Kossuth Lajos út 191.
5440 Kunszentmárton, Kossuth Lajos út 2.
5500 Gyomaendrőd, Szabadság tér 7.
5510 Dévaványa, Árpád utca 32.
5520 Szeghalom, Tildy Zoltán utca 4-8.
5530 Vésztő, Kossuth Lajos utca 72.
5540 Szarvas, Kossuth Lajos tér 1.
5600 Békéscsaba, Andrássy út 37-43.
5600 Békéscsaba, Szent István tér 3.
5630 Békés, Széchenyi tér 2.
5650 Mezőberény, Kossuth Lajos tér 12.
5700 Gyula, Bodoky utca 9.
5720 Sarkad, Árpád fejedelem tér 5.
5742 Elek, Gyulai út 5.
5800 Mezőkovácsháza, Árpád utca 177.
5820 Mezőhegyes, Zala György lakótelep 7.
5900 Orosháza, Kossuth Lajos utca 20.
6000 Kecskemét, Dunaföldvári út 2.
6000 Kecskemét, Korona utca 2.
6000 Kecskemét, Szabadság tér 5.
6050 Lajosmizse, Dózsa György út 102/A
6060 Tiszakécske, Béke tér 6.
6070 Izsák, Szabadság tér 1.
6080 Szabadszállás, Dózsa György út 1.
6090 Kunszentmiklós, Kálvin tér 11.
6100 Kiskunfélegyháza, Petőfi tér 1.
6120 Kiskunmajsa, Csendes köz 1.
6200 Kiskőrös, Petőfi Sándor tér 13.
6230 Soltvadkert, Szentháromság utca 2.
6237 Kecel, Császártöltési utca 1.
6300 Kalocsa, Szent István király út 43-45.
6320 Solt, Kossuth Lajos utca 48-50.
6400 Kiskunhalas, Sétáló utca 7.
6430 Bácsalmás, Szent János utca 32.
6440 Jánoshalma, Rákóczi Ferenc utca 10.
6500 Baja, Deák Ferenc utca 1.
6600 Szentes, Kossuth Lajos utca 26.
6640 Csongrád, Szentháromság tér 2-6.
6720 Szeged, Aradi vértanúk tere 3.
6720 Szeged, Takaréktár utca 7.
6724 Szeged, Londoni körút 3.
6724 Szeged, Rókusi körút 42-64.
6760 Kistelek, Kossuth utca 6-8.
6782 Mórahalom, Szegedi út 3.
6800 Hódmezővásárhely, Andrássy út 1.
6900 Makó, Széchenyi tér 14-16.
7000 Sárbogárd, Ady Endre út 172.
7020 Dunaföldvár, Béke tér 11.
7030 Paks, Dózsa György út 33.
7090 Tamási, Szabadság utca 33.
7100 Szekszárd, Szent István tér 5-7.
7130 Tolna, Kossuth Lajos utca 31.
7140 Bátaszék, Budai utca 13.
7150 Bonyhád, Szabadság tér 10.
7200 Dombóvár, Dombó Pál utca 3.
7300 Komló, Kossuth Lajos utca 95/1
7400 Kaposvár, Széchenyi tér 2.
7500 Nagyatád, Korányi Sándor utca 6.
7561 Nagybajom, Fő utca 107.
7570 Barcs, Séta tér 5.
7621 Pécs, Rákóczi út 1.
7621 Pécs, Rákóczi út 44.
7622 Pécs, Bajcsy-Zsilinszky utca 11/1.
7632 Pécs, Diána tér 14.
7633 Pécs, Ybl Miklós utca 7/3
7700 Mohács, Széchenyi tér 1.
7754 Bóly, Hősök tere 8/B
7773 Villány, Baross Gábor utca 36.
7800 Siklós, Felszabadulás utca 60-62.
7900 Szigetvár, Vár utca 4.
7940 Szentlőrinc, Munkácsy Mihály utca 16/A
7960 Sellye, Köztársaság tér 4.
8000 Székesfehérvár, Holland fasor 2.
8000 Székesfehérvár, Ősz utca 13.
8060 Mór, Deák Ferenc utca 2.
8100 Várpalota, Újlaky út 2.
8130 Enying, Kossuth Lajos utca 43.
8154 Polgárdi, Deák Ferenc utca 16.
8200 Veszprém, Brusznyai Árpád utca 1.
8220 Balatonalmádi, Baross Gábor út 5/A
8230 Balatonfüred, Petőfi Sándor utca 8.
8300 Tapolca, Fő tér 2.
8330 Sümeg, Kisfaludy Sándor tér 1.
8360 Keszthely, Kossuth Lajos utca 38.
8380 Hévíz, Erzsébet királyné utca 11.
8400 Ajka, Szabadság tér 18.

8420 Zirc, Rákóczi tér 15.
8500 Pápa, Fő tér 22.
8600 Siófok, Fő tér 10/A
8630 Balatonboglár, Dózsa György utca 1.
8640 Fonyód, Ady Endre utca 25.
8660 Tab, Kossuth Lajos utca 96.
8700 Marcali, Rákóczi utca 6-10.
8790 Zalaszentgrót, Batthyány Lajos utca 11.
8800 Nagykanizsa, Deák Ferenc tér 15.
8800 Nagykanizsa, Erzsébet tér 23.
8840 Csurgó, Petőfi tér 20/A
8900 Zalaegerszeg, Kisfaludy Sándor utca 15-17.
8960 Lenti, Dózsa György út 1.
9022 Győr, Teleki László utca 51.
9023 Győr, Bartók Béla út 53/B
9024 Győr, Kormos István utca 6.
9026 Győr, Egyetem tér 1.
9027 Győr, Budai út 1.
9200 Mosonmagyaróvár, Fő utca 24.
9300 Csorna, Soproni út 58.
9330 Kapuvár, Szent István király utca 4-6.
9400 Sopron, Teleki Pál út 22/A
9400 Sopron, Várkerület 96.
9431 Fertőd, Fő utca 7.
9500 Celldömölk, Kossuth Lajos utca 18.
9600 Sárvár, Batthyány utca 2.
9700 Szombathely, Fő tér 3-5.
9700 Szombathely, Király utca 10.
9700 Szombathely, Rohonci út 52.
9730 Kőszeg, Kossuth Lajos utca 8.
9737 Bük, Kossuth utca 1-3.
9800 Vasvár, Alkotmány utca 2.
9900 Körmend, Vida József utca 12.
9970 Szentgotthárd, Mártírok út 2.

STATEMENT ON CORPORATE GOVERNANCE PRACTICE

Corporate governance practice

OTP Bank Plc., being registered in Hungary, has a corporate governance policy that complies with the provisions on companies of the act applicable (Civil Code). As the company conducts banking operations, it also adheres to the statutory regulations pertaining to credit institutions.

Beyond fulfilling the statutory requirements, as a listed company on the Budapest Stock Exchange (BSE), the company also makes an annual declaration on its compliance with the BSE's Corporate Governance Recommendations. After being approved by the General Meeting, this declaration is published on the websites of both the Stock Exchange (www.bet.hu) and the Bank (www.otpbank.hu).

System of internal controls

OTP Bank Plc., as a provider of financial and investment services, operates a closely regulated and state-supervised system of internal controls.

OTP Bank Plc. has detailed risk management regulations applicable to all types of risks (credit, country, counterparty, market, liquidity, operational, compliance), which are in compliance with the regulations on prudent banking operations. The Bank Group pays special attention to the management of ESG risks and the implementation of climate protection aspects in business practice. Its risk management system extends to cover the identification of risks, the assessment and analysis of their impact, elaboration of the required action plans and the monitoring of their effectiveness and results. The business continuity framework is intended to provide for the continuity of services. Developed on the basis of international methodologies, the lifecycle model includes process evaluation, action plan development for critical processes, the regular review and testing of these, as well as related DRP activities.

OTP Bank Plc.'s internal audit system is realised on several levels of control built on each other. The system of internal checks and balances includes process-integrated control, management control, independent internal audit and executive information system. The independent internal audit organisation as a key element of internal lines of defence promotes the statutory and efficient management of assets and liabilities, the defence of property, the safe course of business, the efficient operation of internal control systems, the minimisation of risks, moreover it reveals and reports deviations from statutory regulations and internal rules, makes proposal to abolish deficiencies and follows up the execution of actions. The independent internal audit organisation annually and quarterly prepares group-level reports on control actions and audit results for the executive boards. Once a year, the internal audit organisation with the prior opinion of the Audit Committee draws up, for the Supervisory Board, the Board of Directors and the Risk Assumption and Risk Management Committee, objective and independent reports in respect of the operation of risk management, internal control mechanisms and corporate governance functions. Furthermore, in line with the provisions of the Credit Institutions Act, reports, once a year, to the Supervisory Board and the Board of Directors on the regularity of internal audit tasks, professional requirements and the conduct of audits, and on the review of compliance with IT and other technical conditions needed for the audits.

In line with the regulations of the European Union, the applicable Hungarian laws and supervisory recommendations, OTP Bank Plc. operates an independent organisational unit with the task of identifying and managing compliance risks. The Compliance Directorate prepares a report quarterly to the Board of Directors, and annually to the Supervisory Board, about the Bank's and the Bank Group's compliance activities and position.

IT Controls

Applications are developed by either in-house group resources or by third parties. OTP Bank applies administrative, logical and physical control measures commensurate with the risk in order to protect the IT systems storing and processing data, as follows:

- access to data/systems is only possible on the basis of a predefined authorisation management process that applies the principle of least privilege, ensures segregation of responsibilities, that has regular access right reviews and ensures that dismissed employees' access is revoked in a timely manner;
- user authentication, authorisation and password management processes are controlled by policies and audited;
- the systems have test and development environments with appropriate separation from the production environments that have a secure change management procedure, which ensures that program developments or modifications can only be deployed to the operational environment after proper, controlled testing and approval;
- systems are protected by appropriate network perimeter protection, various security devices and network segmentation, furthermore all network communications are protected with state-of-the-art encryption;
- the IT systems that store and process data are regularly backed up and backup media is stored in controlled premises with adequate protection for long-term retention, and the organisation carries out regular backup restore tests;
- adequate redundancy is applied for IT systems that store and process data to ensure business continuity and disaster resiliency;
- has developed DRPs and BCPs for critical systems and critical business processes, which are regularly tested and reviewed;
- the Bank collects and retains the complete log of all major IT operations and IT security relevant data processing activities and the confidentiality, availability, integrity, authenticity and non-repudiation of these audit logs are ensured;
- there is a continuous, up-to-date protection against malicious codes;
- it ensures the regular implementation of vendor patches and updates for the environments used;
- it uses a data leakage protection (DLP) solution to reduce the risk of inadvertent data loss;
- it ensures the continuous monitoring of the operation events of the physical and virtual environment system elements with automated event detection and management tools;
- the above measures are documented at an appropriate level, which ensures the traceability of the implementation of data security requirements in a transparent manner;
- it ensures permanent secure deletion of the data stored on the media, the destruction of the media and the documentation of the destruction of the media during secure operational media disposal processes;
- it enforces data protection requirements already at the design stage of the implementation of the IT systems storing and processing personal data and of the systems operational processes related to them;
- acquire and maintain ability to adequately handle application related security events (including cyber threats), entailing prevention, detection, identification, isolation, analysis, recovery and reporting;
- remote work is regulated in a controlled and documented way, remote device and user access is protected with multi-factor authentication;
- ensures IT security compliance by its managed regulative framework;
- revision and update of IT security regulations bi-yearly or in a frequency complying legislative requirements or upon major changes;

- ensures vulnerability assessments and penetration tests are carried out as planned;
- defines pools for categorization of installed software into preferred, allowed and prohibited and ensures compliance to that policy;
- it ensures that its employees have adequate knowledge of data protection requirements and provides regular data protection and information security awareness training for them.

General Meeting

The General Meeting is the supreme governing body of OTP Bank Plc. The regulations pertaining to its operation are set forth in the Company's Articles of Association, and comply fully with both general and special statutory requirements. Information on the General Meeting is available in the Corporate Governance Report.

Regulations and information to be presented in the Business Report concerning securities conferring voting rights issued by the Company and senior officials, according to the effective Articles of Association, and ownership structure

The Company's registered capital is HUF 28,000,001,000, that is twenty-eight thousand million one thousand Hungarian forint, divided into 280,000,010 that is Two hundred and eighty million and ten dematerialised ordinary shares with a nominal value of HUF 100 each, and a total nominal value of HUF 28,000,001,000, that is twenty-eight billion one thousand Hungarian forint. The ordinary shares of the Company specified all have the same nominal value and bestow the same rights in respect of the Company. There are no restrictions in place concerning the transfer of issued securities constituting the registered capital of the Company.
No securities with special control rights have been issued by the Company.
Special Employee Partial Ownership Plan Organization No. I. of OTP Employees and Special Employee Partial Ownership Plan Organization No. II. of OTP Employees (hereinafter referred to as: OTP SEPOPs) were established based on the decision of the Company's certain employees and executives considered as employees pursuant to the Act XLIV of 1992 on Employee Partial Ownership Plan. Management rights of OTP SEPOPs are exercised by a trust named *Alapítvány az OTP Munkavállalók Különleges Résztulajdonosi Programjáért,* founded by the same employees setting up OTP SEPOPs. The Company did not participate either in foundation or in management of OTP SEPOPs.
The Company in line with the ESOP Act initiated an employee share ownership plan having a remuneration purpose and founded OTP Bank ESOP Organization for its execution (hereinafter referred to as ESOP Organization). Pursuant to the laws, the management rights over the ESOP Organization are exercised by a law firm, the so called trustee. In the case of the ESOP Organization Szűcs Law Firm is entitled to exercise the authorities of the trustee.
The Company participated in the foundation of the ESOP Organization, however, after its foundation it cannot participate in its management, and according to the laws, it is not entitled to either give orders or to recall the trustee.

Rules on the restrictions of the voting rights:
The Company's ordinary shares confer one vote per share.
An individual shareholder or group of shareholders may not exercise voting rights in respect of in an extent exceeding 25%, or – if the voting rights of another shareholder or group of shareholders exceed 10% – exceeding 33% of the total voting rights represented by the shares conferring voting rights at the Company's General Meeting.
The shareholder is obliged to notify the Company's Board of Directors without delay if the shareholder directly or indirectly,

or together with other shareholders in the same group of shareholders, holds more than 2% of the voting rights represented by the shares conferring voting rights at the Company's General Meeting. Concurrently with this, the shareholder is obliged to designate the shareholders through which the indirect voting right exists, or the members of the group of shareholders. In the event of a failure to provide such notification, or if there are substantive grounds for assuming that the shareholder has made a misleading declaration regarding the composition of the shareholder group, then the shareholder's voting right shall be suspended and may not be exercised until the shareholder has met the above obligations. The notification obligation stipulated in this paragraph and the related legal consequences are also incumbent upon individuals who are classified or may be classified as the Company's shareholders under Article 61 of the Capital Markets Act. The Company must also be provided with proof of the conditions for exemption from the notification obligation in accordance with Section 61 (7)-(8) and (11) and Section 61 (10), (11a) and (12), of the Capital Markets Act.
Shareholder group: the shareholder and another shareholder, in which the former has either a direct or indirect shareholding or has an influence without a shareholding (collectively: a direct and/or indirect influence); furthermore: the shareholder and another shareholder who is exercising or is willing to exercise its voting rights together with the former shareholder, regardless of what type of agreement between the participants underlies such concerted exercising of rights. For determining the existence and extent of the indirect holding, the rules of the Credit Institutions Act relating to the calculation of indirect ownership shall be applied.
If the voting rights that may be exercised by a shareholder group exceed the threshold stipulated above, the voting rights shall be reduced in such a way that the voting rights relating to the shares most recently acquired by the group of shareholders shall not be exercisable.

If there are substantive grounds to presume that the exercising of voting rights by any shareholder or shareholders might result in a breach of the rules of the Capital Markets Act relating to the acquisition of a controlling interest, the Board of Directors' authorised representative responsible for the registration of shareholders at the venue of the General Meeting, or the Chairman of the General Meeting, may exclude the affected shareholders from attending the General Meeting or exercising voting rights.

The General Meeting has exclusive authority with respect to the following matters:

- changes to the rights associated with specific series of shares, or the transformation of certain categories or classes of shares; (qualified majority)
- the decision regarding the delisting of the shares (qualified majority). When making the decisions, shares embodying multiple voting rights shall represent one share.

The Company is not aware of any kind of agreements among the owners that could give rise to the restriction of the transfer of issued securities and/or the voting rights.
Rules on the appointment and removal of executive officers, and rules on amendment of the Articles of Association:
The Board of Directors has at least 5, and up to 11 members.
When making the decisions, shares embodying multiple voting rights shall represent one share. The members of the Board of Directors are elected by the General Meeting based on its decision uniformly either for an indefinite period or for five years; in the latter case the mandate ends with the General Meeting concluding the fifth financial year following the election. The mandate of a member elected during this period expires together with the mandate of the Board of Directors.
The Board of Directors elects a Chairman and may elect one or more Deputy Chairmen, from among its own members, whose period of office shall be equal to the mandate of the Board of Directors. The Chairman of the Board of Directors is also the Chief Executive

Officer (Chairman & CEO) of the Company, unless the Board of Directors decides within its competence that the position of Chairman of the Board of Directors and the Chief Executive Officer of the Company are held by separate persons.

The membership of the Board of Directors ceases to exist by
a) expiry of the mandate,
b) resignation,
c) recall,
d) death,
e) the occurrence of grounds for disqualification as regulated by law.
f) termination of the employment of internal (executive) Board members.

The General Meeting has exclusive authority with respect to the following matters:
- the recall of members of the Board of Directors, the Supervisory Board and Audit Committee, and of the auditor; (qualified majority) More than one third of the members of the Board of Directors and the non-executive members of the Supervisory Board may be recalled within a 12-month period only if any shareholder holds more than 33% of the shares issued by the Company, which have been obtained by the shareholder by way of a public purchase offer.
- except in the cases referred by these Articles of Association to the authority of the Board of Directors, the establishment and amendment of the Articles of Association; (qualified majority); the General Meeting decides on proposals concerning the amendment of the Articles of Association – based on a resolution passed by shareholders with a simple majority – either individually or en masse.

The Board of Directors is obliged to
- prepare the Company's financial statements in accordance with the Accounting Act, and make a proposal for the use of the profit after taxation;
- prepare a report once a year for the General Meeting, and once every three months for the Supervisory Board, concerning management, the status of the Company's assets and business policy;
- provide for the proper keeping of the Company's business books;
- perform the tasks referred to its authority under the Credit Institutions Act, in particular:
  - ensuring the integrity of the accounting and financial reporting system;
  - elaborating the appropriate strategy and determining risk tolerance levels for each business unit concerned;
  - setting risk assumption limits;
  - providing the necessary resources for the management or risk, the valuation of assets, the use of external credit ratings and the application of internal models.

The following, in particular, come under the exclusive authority of the Board of Directors:
- election of the Chairman & Chief Executive Officer of the Company, and exercising employer's right in respect thereof;
- election of one or more Deputy Chairmen of the Board of Directors;
- determination of the annual plan;
- the analysis and assessment of the implementation of business-policy guidelines, on the basis of the Company's quarterly balance sheet;
- decisions on transactions referred to the authority of the Board of Directors by the Company's organisational and operational regulations;
- decision on launching, suspending, or terminating the performance of certain banking activities within the scope of the licensed activities of the Company;
- designation of the employees entitled to sign on behalf of the Company;
- decision on the increasing of registered capital at the terms set out in the relevant resolution of the General Meeting;
- decision to acquire treasury shares at the terms set out in the relevant resolution of the General Meeting;
- decision on approving internal loans in accordance with the Credit Institutions Act;
- decision on the approval of regulations that fundamentally determine banking

operations, or are referred to its authority by the Credit Institutions Act. The following shall qualify as such regulations:

  - the collateral evaluation regulations,
  - the risk-assumption regulations,
  - the customer rating regulations,
  - the counterparty rating regulations,
  - the investment regulations,
  - the regulations on asset classification, impairment and provisioning,
  - the organisational and operational regulations, which contain the regulations on the procedure for assessing requests related to large loans,
  - the regulations on the transfer of signatory rights;
- the decision on approving the Rules of Procedure of the Board of Directors;
- decision on steps to hinder a public takeover procedure;
- decision on the acceptance of a public purchase offer received in respect of treasury shares;
- decision on the commencement of trading in the shares in a regulated market (flotation);
- decision on the cessation of trading in the shares in a given regulated market, provided that the shares are traded in another regulated market (hereinafter: transfer).

The Board of Directors is exclusively authorised to:

- decide, in the cases specified in the Civil Code, on acceptance of the Company's interim balance sheet, subject to the prior approval of the Supervisory Board;
- decide, instead of the General Meeting, to pay an advance on dividends, subject to the preliminary approval of the Supervisory Board;
- make decisions regarding any change in the Company's name, registered office, permanent establishments and branches, and in the Company's activities – with the exception of its core activity – and, in relation to this, to modify the Articles of Association should it become necessary to do so on the basis of the Civil Code or the Articles of Association;
- make decision on mergers (if, according to the provisions of the law on the transformation, merger and demerger of legal entities, the approval of the General Meeting is not required in order for the merger to take place).

The Board of Directors directly exercises employer's rights in respect of the Chairman & CEO. The person affected by a decision may not participate in the decision making. Employer rights in respect of the executive directors of the Company are exercised by the Board of Directors through the Chairman & CEO, with the proviso that the Board of Directors must be notified in advance of the appointment and dismissal of the Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the Chief Executive Officer and by the senior company employees defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors. If the Chairman of the Board of Directors and the CEO are different persons, the employer rights in respect of the other executive directors of the Company (CEO, deputy CEOs) are exercised by the Board of Directors through the Chairman of Board of Directors, with the proviso that the Board of Directors shall be notified in advance of the appointment and dismissal of the CEO and Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the persons defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors.
The Board of Directors may delegate, to individual members of the Board of Directors, to executive directors employed by the Company, and to the heads of the individual service departments, any task that does not come under the exclusive authority of the Board of Directors in accordance with these Articles of Association or a General Meeting resolution.
The Company may acquire treasury shares in accordance with the rules of the Civil Code.

The prior authorisation of the General Meeting is not required for the acquisition of treasury shares if the acquisition of the shares is necessary in order to prevent a direct threat of severe damage to the Company (this provision is not applicable in the event of a public purchase offer aimed at buying up the Company's shares), as well as if the Company acquires the treasury shares in the context of a judicial procedure aimed at the settlement of a claim to which the Company is entitled, or in the course of a transformation.

The Company has not made agreements in the meaning of points (j) and (k) in paragraph 95/A of Act No. C of 2000 on Accounting.

Ownership structure of OTP Bank Plc.:

Description of owner	Total equity					
	1 January 2024			31 December 2024		
	Ownership share	Voting rights[1]	Quantity	Ownership share	Voting rights[1]	Quantity
Domestic institution/company	31.40%	31.46%	87,914,205	31.57%	32.39%	88,395,584
Foreign institution/company	54.43%	54.54%	152,405,042	54.53%	55.94%	152,679,265
Domestic individual	12.93%	12.96%	36,217,730	10.31%	10.58%	28,878,581
Foreign individual	0.48%	0.48%	1,349,320	0.36%	0.37%	998,943
Employees, senior officers	0.48%	0.48%	1,338,715	0.51%	0.53%	1,435,703
Treasury shares[2]	0.20%	0.00%	572,746	2.52%	0.00%	7,049,823
Government held owner	0.05%	0.05%	139,036	0.05%	0.05%	139,036
International Development Institutions	0.01%	0.01%	28,603	0.00%	0.00%	3,251
Other[3]	0.01%	0.01%	34,613	0.15%	0.15%	419,824
TOTAL	**100.00%**	**100.00%**	**280,000,010**	**100.00%**	**100.00%**	**280,000,010**

[1] Voting rights in the General Meeting of the Issuer for participation in decision-making.
[2] Treasury shares do not include the OTP shares held by ESOP (OTP Bank Employee Stock Ownership Plan Organization). Pursuant to Act V of 2013 on the Civil Code, OTP shares held by the ESOP are not classified as treasury shares, but the ESOP must be consolidated in accordance with IFRS 10 Consolidated Financial Statements standard. On 31 December 2024 ESOP owned 11,965,796 OTP shares.
[3] Non-identified shareholders according to the shareholders' registry.

Number of treasury shares held in the year under review (2024):

	1 January	31 March	30 June	30 September	31 December
OTP Bank	572,746	1,452,570	3,443,352	4,762,756	7,049,823
Subsidiaries	0	0	0	0	0
TOTAL	**572,746**	**1,452,570**	**3,443,352**	**4,762,756**	**7,049,823**

Shareholders with over/around 5% stake as at 31 December 2024:

Name	Nationality[1]	Activity[2]	Number of shares	Ownership[3]	Voting rights[3, 4]	Notes[5]
MOL (Hungarian Oil and Gas Company Plc.)	**D**	**C**	**24,000,000**	**8.57%**	**8.79%**	
Groupama Group	**F/D**	**C**	**14,260,181**	**5.09%**	**5.22%**	
Groupama Gan Vie SA	F	C	14,140,000	5.05%	5.18%	
Groupama Biztosító Ltd.,	D	C	120,181	0.04%	0.04%	

[1] Domestic (D), Foreign (F).
[2] Custodian (CU), Public Institution (PU), International Development Institutions (ID), Institutional (I), Company (C), Private (PR), Employee or senior officer (E).
[3] Rounded to two decimals.
[4] Voting rights in the General Meeting of the Issuer for participation in decision-making.
[5] Eg, professional investor, financial investor etc.

Senior officers, strategic employees and their shareholding of OTP shares as at 31 December 2024:

Type[1]	Name	Position	Commencement date of the term	Expiration/termination of the term	Number of shares
IG	dr. Sándor Csányi[2]	Chairman and CEO	15/05/1992	2026	76,887
IG	Tamás György Erdei	Deputy Chairman	27/04/2012	2026	59,685
IG	Gabriella Balogh	member	16/04/2021	2026	27,393
IG	Mihály Baumstark	member	29/04/1999	2026	58,800
IG	Péter Csányi	member, Deputy CEO	16/04/2021	2026	49,429
IG	dr. István Gresa	member	27/04/2012	2026	195,058
IG	Antal György Kovács[3]	member	15/04/2016	2026	114,940
IG	György Nagy[4]	member	16/04/2021	2026	13,000
IG	dr. Márton Gellért Vági	member	16/04/2021	2026	22,600
IG	dr. József Zoltán Vörös	member	15/05/1992	2026	204,914
IG	László Wolf	member, Deputy CEO	15/04/2016	2026	554,412
FB	Tibor Tolnay	Chairman	15/05/1992	2026	54
FB	dr. József Gábor Horváth	Deputy Chairman	19/05/1995	2026	0
FB	Klára Bella	member	12/04/2019	2026	491
FB	dr. Tamás Gudra	member	16/04/2021	2026	0
FB	András Michnai	member	25/04/2008	2026	1,410
FB	Olivier Péqueux	member	13/04/2018	2026	0
SP	András Becsei	Deputy CEO			11,649
SP	László Bencsik	Deputy CEO			16,003
SP	György Kiss-Haypál	Deputy CEO			15,995
SP	Imre Bertalan	MC member			0
SP	dr. Bálint Csere	MC member			12,983
Total No. of shares held by management					**1,435,703**

[1] Board Member (IG), Supervisory Board Member (FB), Employee in strategic position (SP).
[2] Number of OTP shares owned by Dr. Sándor Csányi, Chairman and CEO, directly or indirectly: 5,276,887.
[3] Number of OTP shares owned by Antal György Kovács, Member of Board of Directors, directly or indirectly: 119,240.
[4] Number of OTP shares owned by György Nagy, Member of Board of Directors, directly or indirectly: 980,000.

Committees[1]

Members of the Board of Directors

Dr. Sándor Csányi – Chairman
Mr. Tamás György Erdei – Deputy Chairman
Ms. Gabriella Balogh
Mr. Mihály Baumstark
Mr. Péter Csányi
Dr. István Gresa
Mr. Antal György Kovács
Mr. György Nagy
Dr. Márton Gellért Vági
Dr. József Zoltán Vörös
Mr. László Wolf

Members of the Supervisory Board

Mr. Tibor Tolnay – Chairman
Dr. József Gábor Horváth – Deputy Chairman
Ms. Klára Bella
Dr. Tamás Gudra
Mr. András Michnai
Mr. Olivier Péqueux

Members of the Audit Committee

Dr. József Gábor Horváth – Chairman
Mr. Tibor Tolnay – Deputy Chairman
Dr. Tamás Gudra
Mr. Olivier Péqueux

The résumés of the committee and board members are available in the Corporate Governance Report/Annual Report.

[1] Personal changes can be found in the "Personal and organizational changes" chapter.

Auditor

On 26 April 2024, concerning the audit of OTP Bank Plc.'s separate and consolidated annual financial statements in accordance with International Financial Reporting Standards for the year 2024, the Annual General Meeting elected Ernst & Young Ltd. (001165, H-1132 Budapest, Váci út 20.) as the Company's auditor from 1 May 2024 until 30 April 2025.

Operation of the executive boards

OTP Bank Plc. has a dual governance structure, in which the Board of Directors is the Company's executive management body in its managerial function, while the Supervisory Board is the management body in its supervisory function of the Company. It controls the supervision of the lawfulness of the Company's operation, its business practices and management, performs oversight tasks and accepts the provisions of the Bank Group's Remuneration Policy. The effective operation of Supervisory Board is supported by the Audit Committee, as a committee, which also monitors the internal audit, the risk management, the reporting systems and the activities of the auditor.

In order to assist the performance of the governance functions the Board of Directors founded and operates, as permanent or other committees, such as the Management Committee, the Executive Steering Committee, the Remuneration Committee, the Nomination Committee and the Risk Assumption and Risk Management Committee.

To ensure effective operation OTP Bank Plc. also has a number of further permanent committees.

OTP Bank Plc. gives an account of the activities of the executive boards and the committees every year in its Corporate Governance Report. The Board of Directors held 6, the Supervisory Board held 7 meetings, while the Audit Committee held 2 meetings in 2024. In addition, resolutions were passed by the Board of Directors on 149, by the Supervisory Board on 73 and by the Audit Committee on 24 occasions by written vote.

Policy of diversity

OTP Bank Plc. determines and regulates the criteria for the selection of senior executives in line with European Union as well as domestic legal requirements and directives fundamentally determining the operation of credit institutions.

When designating members of the management bodies (Board of Directors, Supervisory Board) as well as appointing members of the Board of Directors and administrative members (Management), OTP Bank Plc. considers the existence of professional preparation, the high-level human and leadership competence, the versatile educational background, the widespread business experience and business reputation of the utmost importance, at the same time, it is also highly committed to taking efficient measures in order to ensure diversity with regard to corporate operation, including the gradual improvement in women's participation rate.

OTP Bank Plc.'s Nomination Committee continuously keeps tracking the European Union and domestic legislation relating to women's quota on its agenda, in that when unambiguously worded expectations are announced, it promptly takes the necessary measures.

In accordance with OTP Bank Plc.'s currently approved strategy, the goal is to have at least one female member in both the Bord of Directors and the Supervisory Board.

It is important to note, however, that, as a public limited company, the selection of the members of the management bodies falls within the exclusive competence of the General Meeting upon which – beyond its capacity to designate enforcing the above aspects to maximum effect – OTP Bank Plc. has no substantive influence.

According to OTP Bank Plc.'s Articles of Association, a Board of Directors comprising 5–11 members and a Supervisory Board comprising 5–9 members are set up at OTP Bank Plc. Currently the Board of Directors operates with 11 members and has one female member, the Supervisory Board comprises 6 members and has one female member. The management of OTP Bank Plc. currently comprises 6 members and has no female member.

NON-FINANCIAL STATEMENT OTP BANK PLC. (SEPARATE)

Environmental policy, environmental projects

The operational functioning of OTP Group and OTP Bank requires the use of natural resources and energy, however, the resulting environmental impact is significantly lesser than the indirect impacts associated with the provision of financial services. Of the operational impacts, OTP Group considers greenhouse gas (GHG) emissions to be the most significant, but we are also working on reducing our impacts beyond this. Emissions contribute to climate change and damage natural resources. Reducing emissions helps fight climate change. However, the practices of the Bank also have an awareness raising impact in the field of environmental protection and the enforcement of environmental awareness in its operations is a key element of the regional leading role undertaken by OTP Group in relation to green transition.
In the context of the provision of financial services, environmental risks are managed and business opportunities related to environmental protection are exploited within the ESG strategy and are not covered in this chapter.
In 2024, OTP Group again participated in the CDP's environmental disclosure scheme, maintaining its "B" rating achieved in the previous year.
OTP Bank mitigates environmental impacts through the following activities:

- Efficient use of resources
- Carbon-neutral operation
- Energy efficiency investment projects
- Purchase of green electricity, use of renewable energy sources
- Reducing paper use through digitalisation; using recycled paper
- Rationalising business travel
- Improving waste management
- Transparent reporting on the environmental impacts of operation
- Awareness-raising activities for employees and customers

OTP Bank members operate in maximum compliance with environmental legislation and no related fines were imposed in 2024 either. Environmental protection at the Bank is governed by an Environmental Policy. OTP Bank prepares annual internal reports on the environmental impact of its operation, for approval by the manager in charge of this function.
To enhance knowledge relating to the performance of work, along with general knowledge, every OTP Bank employee is provided with environmental training once every two years.

Energy consumption and carbon dioxide emissions

In 2021 OTP Bank set a goal in its ESG strategy to achieve carbon-neutral operations by 2030. This absolute goal covers Scope 1–2 emissions, with a target of 0 tCO_2e, zero net emissions, without specifying a base year. Zero net emissions involve reducing greenhouse gas emissions as much as possible and neutralizing unavoidable emissions through carbon removal. The goal is not based on scientific evidence, and OTP Bank's relevant departments participated in its development. The goal of net carbon neutrality was also achieved in 2024.
OTP Bank's market-based Scope 1–2 emissions in 2024 were 6,688 tCO_2e. In terms of electricity, OTP Bank mainly uses green energy, with about three-quarters of emissions coming from natural gas use and vehicle fuel consumption. The preparation of the Bank's emission intensity reduction plan related to properties and fleet has begun, with an ESG Committee decision to complete it in 2025.
Primarily, the larger banks within the Bank Group implement and plan measures to reduce carbon dioxide emissions. Among the planned measures, the purchase of green electricity has the greatest impact, and OTP Bank mainly covered its consumption with green electricity

in 2024. This practice is planned to continue in 2025. Additionally, planned measures include lighting replacement, boiler replacements, optimization of heating and cooling, insulation, and solar panel installation.

To offset its 2023 Scope 1 and Scope 2 emissions OTP Bank purchased carbon credits in 2024, amounting to 7,000 tCO_2e. This amount covers OTP Bank's total Scope 1–2 emissions.

The carbon credits retired during the reporting period were verified by the Verified Carbon Standard, by Verra. The Bank considers it important that the project supported through offsetting is implemented in the country of the Bank Group's operations. Therefore, the only project supported by the purchase is the Sant Nikola Wind Farm near Kavarna, Bulgaria, the largest wind farm in the country. The project is a reduction project and does not qualify as an appropriate adjustment under Article 6 of the Paris Agreement[2].

OTP Bank's goal of carbon-neutral operations includes the use of carbon credits. The use of carbon credits does not hinder the achievement of the zero-emission goal for Scope 1–2 by 2030, as OTP Bank has begun developing emission reduction plans based on energy efficiency and renewable energy use. Additionally, the Bank plans to replace the carbon credits purchased to offset its operational carbon footprint with so-called "habitat restoration certificates" in line with its previous practice.

In collaboration with Pilisi Parkerdő Ltd. as a partner, we aim to develop a 400-hectare nature conservation area, the so-called Budakeszi Game Reserve, with a complex urban forest approach. This development prioritizes the preservation and enhancement of the forest's natural and ecological values over economic aspects, aiming for eco-tourism development in harmony with the forest's natural values. The project's goals are multiple: providing a platform for professional collaborations and scientific work in biodiversity, climate adaptation, carbon sequestration, and ecosystem services, promoting sustainability awareness among our employees by integrating the use of the forest area into a non-financial recognition system, and shaping the Bank's image.

OTP Bank's Scope 1 and Scope 2 CO_2e emissions (t):

	2020[1]	2021	2022	2023	2024
Direct (Scope 1)	***6,078***	***6,548***	***6,670***	***6,005***	***5.565***
Indirect (Scope 2)					
Indirect location-based	***9,883***	***9,904***	***11,496***	***11,648***	***8.170***
Indirect market-based	*8,350*	*8,369*	*1,005*	*1,110*	*1.124*
Total (Scope 1+2) location-based	**15,961**	**16,452**	**18,165**	**17,653**	**13.735**
Total (Scope 1+2) market-based	**14,428**	**14,917**	**7,675**	**7,115**	**6.689**
Total (Scope 1+2) with carbon offset	**14,428**	**14,917**	**675**	**(485)**	**(312)**

[1] Also includes the consumption of the former Monicomp and eBIZ.

The figures shown are calculated from energy consumption, in all cases based on the applicable statutory regulations and the factors stipulated by authorities and industry organisations (National Inventory Reports (NIR), IPCC, DEFRA, EU Regulation, AIB, IFI, and data from suppliers for electricity and district heating). For Scope 1 emissions, country-specific factors are applied subject to availability from 2022. We calculate electricity-related emissions using country-specific factors. For district heating use, from 2020 onwards we use the Hungarian, Slovenian and Croatian factors, and for all other countries, we uniformly use the data published by DEFRA, while in previous years we used the Hungarian emission factors, except for Ukraine, Russia and Serbia, in the absence of other reliable data.

Scope 1 emissions and, in 2022 and 2023, even district heating cover all GHG emissions. For Scope 2 emissions, the previous years of district heating in Hungary and electricity factors only cover CO_2. For the emission factors used, we do not have information on the GWP values considered in each and every case.

[2] The project is 100% a reduction project, implemented entirely within the European Union, and certified based on 100% recognized quality standards.

Awareness-raising

The members of the Banking Group have launched numerous programmes, awareness-raising campaigns and involved employees to promote environmental awareness and the protection of natural values. To enhance knowledge relating to the performance of work, along with general knowledge, every OTP Bank employee is provided with environmental training once every two years.

During the Green Challenge idea contest announced in 2023, a total of 136 forward-looking and creative ideas and suggestions were received. Due to the great interest, in 2024 we created a dedicated virtual suggestion box for this topic, where colleagues can share their proposals to make the bank and its processes greener at any time.

We expect ideas from colleagues that contribute to the bank's carbon footprint reduction efforts, are sustainable in the long-term, and can be integrated into daily operations. The submitted proposals are evaluated by a committee that meets monthly after an initial expert assessment, and then prepared for implementation.

The most frequently submitted request last year, the installation of a MOHU REpoint, will be implemented in the bank's office building in 2025.

Go Greener – Commute More Sustainably Challenge

OTP Bank also joined the "Go Greener – Commute More Sustainably" environmental community-building campaign announced by Mastercard, which aimed to set an example among colleagues to choose more sustainable modes of transportation instead of car use. More than 300 of our colleagues actively participated in the challenge, diligently collecting "green" kilometers, and ultimately covered 76,199 km with sustainable transportation during the one-month campaign.

1. General information

1.1 Basis for preparation of the report

ESRS[3] 2 BP-1: General basis for preparing sustainability statements

OTP Bank Plc. has also prepared its CSRD Sustainability Statement (in accordance with the European Sustainability Reporting Standards, ESRS) at the individual level, covering the individual operations of the parent bank (hereinafter "the Bank", "OTP Bank"), with the same scope as the individual-level financial statement.
The consolidated Management Report covering the entire Banking Group (hereinafter referred to as 'the Group', 'OTP Group') is available in the OTP Group's sustainability report (OTP Group Sustainability report)

Company names used in the report:

- OTP Bank Plc.: OTP Bank, the Bank
- a consolidated group of companies: OTP Group, Banking Group, Group

OTP Bank has not made use of the possibility to omit specific information corresponding to intellectual property, know-how or innovation results, nor has it made use of the exemption from disclosure of information on pending developments or matters under negotiation.
Section 95/I (1) of the Hungarian Accounting Law requires that the Company must prepare its business report including the sustainability statement in the electronic reporting format (XHTML) set out in Commission Delegated Regulation (EU) 2019/815(ESEF Regulation), and the sustainability disclosures defined by the ESEF taxonomy, including those required according to article 8 of Regulation (EU) 2020/852, must be tagged in the sustainability statement using the XBRL markup language. Given that the ESEF taxonomy for sustainability reporting has not been adopted yet, the Company, was unable to carry out the XBRL tagging.

Managing the value chain

OTP Bank's materiality analysis at group level took into account the material impacts, risks and opportunities relating to its upstream and downstream value chain. As the parent company of the banking group, OTP Bank Plc. played a key role in the materiality assessment, so the relevance of the value chain assessed for the Group should be interpreted at an individual level as well (for more details on the coverage of the value chain, please refer to subsection 1.1 Basis for preparation of the report in the OTP Group Sustainability Report).

ESRS 2 BP-2: Disclosures relating to specific circumstances

The time horizons, value chain estimation and actionment uncertainty information defined by OTP Bank at the individual level are consistent with the methodology used by the Group (see subsection 1.1 Basis for preparation of the report in the OTP Group Sustainability Report).
This is the first time that OTP Bank discloses sustainability information at an individual level as well, as required by ESRS, so no change from the previous period can be identified and therefore no revised comparative figure is available (see subsection 1.1 Basis for preparation of the report in the OTP Group Sustainability Report). Forward-looking information always carries a certain degree of uncertainty, which is not separately disclosed.
For the previous period, a material error is considered to be one which, on the basis of an individual assessment of the error and under reasonable assumption, could affect the user's decisions made on the basis of the Sustainability Statement.
No other reporting standard indicators are presented in the sustainability report prepared at the individual level.
Disclosures that are incorporated by reference are displayed in the ESRS content index table (see section 5. ESRS Index).
The Bank has made use of the phasing-in option in its individual-level sustainability

[3] European Sustainability Reporting Standards

report, and the ESRS content index table (see section 5. ESRS Index) shows the sustainability subtopics and items for which it has applied this in the first reporting period. For more detail see subsection ESRS 2 BP-2 Disclosures relating to specific circumstances in the OTP Group sustainability report.

1.2 Governance

ESRS 2 GOV-1: Role of governing bodies

Composition and diversity

The management, executive and supervisory bodies of OTP Bank Plc. are the Supervisory Board, the Board of Directors and all their committees, including the Audit Committee and the special and permanent committees listed in the Responsible Corporate Governance Report, which are the same as the management bodies of the OTP Group. Detailed information on the composition and experience of the governing and supervisory bodies can be found in subsection 1.2 Governance – Role of Governing Bodies in the OTP Group Sustainability Report, as well as in the individual financial report.
The composition and the diversity of the Bank's management, executive and supervisory bodies are presented in the subsection and table 1.2 Governance – Composition and diversity in the OTP Group Sustainability Report.

Sustainability roles

In 2021, the Board of Directors decided to establish the bank ESG organisation, whose tasks, responsibilities and reporting obligations cover the whole Group, thus also covering the operations of OTP Bank. The ESG Committee and the ESG Sub-Committee have been included as permanent committees in the Organisational and Operational Rules, the tasks of the relevant organisational units and specialised areas, their responsibilities, reporting obligations and actions taken to ensure sustainability expertise have been defined, which are described in detail in subsection 1.2 Governance – Role of Governing Bodies in the OTP Group Sustainability Report.

ESRS G1 GOV-1: Role of governing bodies in business conduct

The Supervisory Board, the Board of Directors and the Ethics Committee have a prominent role in the enforcement of ethical business conduct and compliance. For the Bank, an essential element of responsible business conduct is the fight against money laundering, in which the Money Laundering Prevention Committee plays an important role. In terms of compliance, governance and organisational responsibility is taken by the Board of Directors and the Supervisory Board.
For more information on the role of governing bodies in business conduct, please refer to subsection 1.2 Governance – The role of governing bodies in business conduct in the OTP Group Sustainability Report.

ESRS 2 GOV-2: Informing governing bodies on sustainability

Information on the impacts, risks and opportunities identified in the materiality assessment is communicated in different ways for each topic, not through a separate channel but integrated into sectoral information practices. The governing bodies' communication on sustainability, risk management practices and procedures for strategic decisions are consistent with those of the OTP Group. The remuneration policy and the criteria and details of executive remuneration also follow the Group's practices. More information on these can be found in the OTP Group Sustainability Report, subsection 1.2 Governance – Informing governing bodies on sustainability.

ESRS 2 GOV-3, E1 GOV-3: Sustainability and Climate Change in Incentive Mechanisms

A summary of the remuneration system specific to OTP Bank can be found in subsection 1.2 Governance – Sustainability in incentive mechanisms in the OTP Group Sustainability

Report, which describes the main guidelines of the Remuneration Policy developed by the parent bank and followed at group level. The Policy includes considerations related to sustainability and climate change targets, which are taken into account as part of the "Environmental and Social Responsibility (ESG-CSR)" indicator.
Climate considerations are taken into account as part of this indicator for persons covered by the Policy. No GHG emission reduction target is included in the benchmarking.

ESRS 2 GOV-4: Due diligence

In OTP Bank's operations, certain elements of the due diligence process are integrated into the Group's operations (not as a separate and interrelated process).
The Bank acts in accordance with its Compliance Policy, which also serves as the basis for group-wide practices, as described in detail in subsection 1.2 Governance – Due diligence in the OTP Group Sustainability Report.

ESRS 2 GOV-5: Risk management in relation to sustainability reporting

The sustainability reporting process (both at individual and group level) is coordinated by the Marketing and Communications Directorate of OTP Bank, which is responsible for the development and operation of internal controls. As an important tool for risk management and internal control procedures, reporting is carried out in close engaging with the parent bank's business areas and, based on the OTP Group's governance model, OTP Bank, as the parent company, provides strategic control and professional/functional guidance and cooperates with the group members.
Following the annual reporting, OTP Bank's Marketing and Communications Directorate assesses the sustainability reporting process and reviews the risks arising from the expected changes in the next period. This assessment also covers the technical, administrative and substantive conditions for reporting. The factors causing difficulties and risks are identified, and steps for improvement are defined. The risks identified and the control actions taken to address them are realised similarly to those used in the preparation of the consolidated report (see subsection 1.2 Governance – Risk management in relation to sustainability reporting in the OTP Group Sustainability Report).

1.3 Strategy

ESRS 2 SBM-1: Strategy, business model and value chain

Business model, products and services

OTP Bank is the leading credit institution in Hungary. OTP Bank's business model is focused on providing a high level of service to the financial needs of Hungarian retail, private banking, micro and small enterprises, medium and large enterprises and municipal customers through the Bank's branch network and the constantly evolving digital and innovative remote service channels, with a focus on ease of use and reliability. The Bank offers a wide range of modern banking and financial services to both retail and corporate customers, collecting demand and fixed deposits from customers and offering a wide range of other savings products, including, country dependent treasury services, treasury services, government securities, investment funds, equities and corporate bonds, as well as other securities and structured investments.
In line with the strategy, the Bank aims to maintain a stable liquidity position across economic cycles to ensure conditions for stable operations and growth. The Bank and the other domestic members of the Group served the financial needs of more than 4.3 million customers at the end of 2024.
A detailed description of the financial services provided by the Banking Group and the related data are presented in the OTP Group Sustainability Report, section 1.3 Strategy, subsection ESRS 2 SBM-1: Strategy, business model and value chain.
The Bank aims to continuously improve its services in a constantly evolving digital and technological environment, so that they

are clear and easily accessible and secure for a broader range of customers. In addition to digitalisation, OTP Bank places a strong emphasis on sustainability, aiming to avoid negative environmental and social impacts, realise positive impacts and leverage potential business benefits. The Bank is committed to offering products that are tailored to the real needs of its customers, in line with their capabilities and contribute to their financial well-being.

Our employees are a key asset, and their high performance is a guarantee of OTP Bank's results. As a responsible employer, the aim is to improve employee well-being. The Bank plays an active role in developing the financial awareness of the population and enriching cultural values.

OTP Bank in Hungary employed 10,820 people at the end of 2024.

Value chain

Upstream value chain

The core business of OTP Bank is the provision of financial services, and, in the value chain part preceding this activity, suppliers of products and services necessary for its operations, products and services are appearing. Procurement of services dominates, in particular marketing communications, IT and telecommunications services. The real-estate used for operational purposes includes both intragroup property and leased space. Company cars are typically owned within the group.

Downstream value chain

This includes the value chain part following OTP Bank's activities, those involved in the sale of products and services, and those who use the products and services, i.e. customers.

The agency channel (third-party sales channel) plays an essential role in the intermediation of financial services. Within the agency sales channel, mortgage brokerage is the most important product. In 2024, OTP Bank's third-party sales within product reached 58% of the contracted amount. The agents of OTP Financial Point (477 persons), who are dependent agents working as self-employed persons and broker the products of OTP Bank, are included in own workforce under the ESRS (see Materiality assessment ESRS2 SBM-3).

The Bank's most significant environmental and social impacts are experienced through its financial services customers, mainly in the area of lending which is the most impactful part of the value chain.

OTP Bank is part of the OTP Banking Group, which has domestic and foreign subsidiaries, most of which are active in the provision of financial services, but there are also entities active in other sectors such as property management and agriculture. The double materiality assessment conducted at group level has fully considered the activities of the subsidiaries. For OTP Bank, the impacts and risks identified pertain to its financial services activities. OTP Bank, as the parent bank of the Banking Group, plays a steering and coordinating role in most areas (typically also in ESG issues), while at the same time it provides opportunities for subsidiary banks to channel and implement their own initiatives. The policies related to the material topics are extended at group level, and, for the related actions, the specificities of the subsidiary banks and the group-level indicators are presented in the OTP Group Sustainability Report.

ESG strategy

OTP Bank plays a leading role in the development and implementation of the group-level sustainability strategy (four-year ESG strategy adopted in 2021), the main target of which is to ensure that the Group is a regional leader in financing a fair and gradual transition to a low-carbon economy and to support ethical, socially and environmentally sound financial choices through responsible solutions.

The Banking Group's ESG strategy (vision, mission, goals and challenges) is detailed in subsection 1.3 Strategy – Strategy, business model and value chain – ESG strategy in the OTP Group Sustainability Report.

ESRS 2 SBM-2: Stakeholders

OTP Bank's group-wide corporate strategy (see the Corporate Strategy section of the consolidated Management Report) aims to serve the needs and expectations of its customers, investors and employees at the highest possible level.

In addition, the Group's ESG strategy expresses the commitment of the Group and its members to act as responsible partners with all its stakeholders, as reflected in the three pillars of the strategy: responsible service provider, responsible employer and responsible social actor.

The Code of Ethics of the OTP Group states that the aim is to apply the principles of ethical business conduct in relations with stakeholders, and that compliance with these principles is a mandatory requirement for all employees and agents[4].

The Bank cooperates with its key stakeholders, and seeking their views is a priority, as meeting their expectations ensures the Bank's social legitimacy and business success. It continuously seeks and takes into account feedback in the design and development of its strategy, activities and programmes.

The materiality assessment and due diligence did not explore the views and interests of stakeholders on the strategy and business model.

[4] Who perform contractual obligations for the OTP Group and in the course of these activities meet a wide range of customers or potential customers of the OTP Group, perform services on behalf of the OTP Group for them or, in the performance of their contractual obligations, clearly appear in public as representatives of the OTP Group.

Stakeholders identified by OTP Bank:

Key stakeholders	Purpose of communication and engaging	Ways of communication and engaging	Taking account of an opinion
Subsidiaries (foreign and domestic)	Developing unified corporate governance, sharing experiences, implementing cross-border engaging	Through representatives of subsidiaries, in engaging with professional teams	Commenting on initiatives identified by the parent bank, presenting operational practices, sharing experiences
Clients, customers (retail, corporate)	Improving service quality, providing quality information on services, understanding customer needs, protecting customer privacy	Customer satisfaction surveys, market research Information and educational materials, videos Information on services (e.g. account statement) Customer service (branch, telephone, video, internet) Complaint management	Consideration of needs, their integration into the service model and product range
Equity and bond investors (and analysts)	Information on the Group's activities and operating environment, the Group's financial performance, the evolution of external and internal factors affecting it, the outlook, and ESG performance. Understanding expectations.	Annual report, stock exchange reports and presentations General Meeting Face-to-face and virtual meetings Answering investor and analyst questions	Consideration of expectations, compliance, transparent information
Employees	Responsible employer practices, employee well-being and development, inclusion, diversity and strengthening employee engagement. Healthy and safe working environment that provides equal opportunities, fair employment practices	Measuring employee engagement, providing possibilities for feedback Performance review Meetings and consultations with employee representatives (e.g. trade unions) Intranet, internal communication	Considering and implementing actions to increase employee engagement, experience and well-being
Regulatory bodies, authorities	Fight against money laundering, fair market competition, ensuring access to financial services, equal opportunities, economic intermediation, contribution to achieving social goals, regulatory compliance, expanding green finance	Reports in compliance with legal requirements Ensuring the availability of state-subsidised products Engaging to prevent crime Consultations through representative bodies (banking associations)	Prudent behaviour, high level of compliance
NGOs/professional organisations	Equal opportunities, improving service delivery, managing environmental and social impacts	Membership of professional organisations Face-to-face meetings, consultations	Learning and applying good practices
Sponsored organisations	Contributing as an active social actor to social and environmental goals, with a focus on developing financial awareness	Extensive, typically long-term engaging	Implementing practices that help the efficient and effective use of aid
Education and research institutions	Participating in research, ensuring labour supply	Building engaging Reception of students	Evolution of corporate practices
Retail	Developing financial culture, education, meeting corporate responsibility expectations	Research on the financial literacy of the population Information and educational materials, videos Training, education	Developing customer information and education practices based on research findings
Suppliers	Developing and expecting ethical partner behaviour	Regulations, policies, contracts Personal consultations	Implementing ethical business conduct
Competitors	Joint advocacy, joint action against money laundering	Membership of representative organisations	Learning and applying good practices

The Board of Directors, the Supervisory Board and the individual committees are informed of matters relating to stakeholders through regular reports.

For more details on these reports, please refer to chapter 1.3 Strategy, subsection Stakeholders in the OTP Group Sustainability Report.

1.4 Materiality assessment

ESRS 2, E1, E2, E3, E4, E5, G1 IRO-1

The purpose of the materiality assessment is to enable OTP Bank to identify material impacts, risks and opportunities arising from its activities. The materiality assessment focused on the question of whether a topic is material, with the depth of the assessment of each impact, risk and opportunity being done with this in mind.
The materiality analysis of OTP Bank is based on the double materiality analysis prepared at the level of the Banking Group. The methodology for the process of identifying and assessing impacts, risks and opportunities for the group-level reporting process has been developed in line with the ESRS requirements. OTP Bank, as the parent bank, played a key role in identifying material impacts, risks and opportunities in the Group's dual materiality analysis. Building on the Group's top-down approach to materiality analysis at the consolidated level, OTP Bank, in relation to its own operations, considers the impacts, risks and opportunities identified in the provision of financial services as its core business as the basis for its reporting at the individual level.
The methodology of the dual materiality analysis of the Banking Group is described in detail in chapter 1.4 Materiality Assessment of the OTP Group Sustainability Report and related to the assessment of climate change-related topics can also be found in section 1.4 Materiality Assessment of the OTP Group Sustainability Report

Identifying and assessing impacts

E1 IRO-1, E2 IRO-1, E3 IRO-1, E4 IRO-1, E5 IRO-1, G1-IRO-1

The materiality assessment focused on factors that are associated with an increased risk of adverse impacts. The scope of activities was a good starting point for identifying the increased risk of adverse impacts, thus, OTP Group grouped its subsidiaries by scope of activities, along which it identified the impacts related to its own activities and value chain. Regarding OTP Bank no new impacts have been identified; all group-level impacts are applicable to the Bank as well.
The OTP Group has identified three relevant scopes of activity: the most prominent are (1) financial services; followed by (2) real-estate and (3) agriculture.
OTP's group-level assessment includes the member companies related to the Bank's operations (as internal members of its value chain, thus providing a more complete picture of the Bank's operational scope). Thus, the Bank relies on the group-level assessment in its individual reporting, however, the impacts identified in the agricultural and real-estate sectors are not relevant for the Bank.
The methodology of the process for identifying and assessing impacts, risks and opportunities is described in detail in section 1.4 Materiality assessment of the OTP Group Sustainability Report.

Consultation with stakeholders

E2 IRO-1, E3 IRO-1, E4 IRO-1, E5 IRO-1

The Bank has used a wide range of sources to understand the views and expectations of stakeholders and has taken them into account in identifying and assessing material impacts at group level.
Among other things, we have used:

- ESG assessments, questionnaires: Sustainalytics, MSCI, Moody's.
- Retail TRI*M Index surveys (nationally representative residential survey) measuring brand, satisfaction and loyalty.
- Employee engagement surveys, with a particular focus on OTP Bank's engagement survey relating to 2024, with 8,596 responses and a 79% response rate.

For its materiality assessment, it also took into account the views of NGOs, universities; public authorities, regulators, public administrations; financial analysts, stock exchanges; media; employee representatives, as requested through an online stakeholder questionnaire. Based on the feedback, one topic was included in the list of material topics (employees: work-life balance), as it was considered material by more than a third of the respondents.

The views of financial analysts and stock market stakeholders were also sought from a financial materiality perspective.

Identifying and assessing financial risks and opportunities

The identification of financial risks and opportunities for sustainability issues was the result of an iterative process.
As a starting point for identifying financial risks and opportunities (long list):

- we used the themes identified by the ESRS
- adding the source points also used for the impact materiality,
- the SASB standards for the financial sector, and
- ESG assessment topics.

Based on the last two sources, there was no need to add a new topic.

Sustainability issues where a relevant risk or opportunity (either from impacts or dependencies) may arise for the OTP Group (short list) were identified through a workshop and subsequent consultations with the assistance of OTP Bank's experts. Participants considered whether the risks and opportunities are relevant in the short, medium or long-term, furthermore no additional risks or opportunities have been identified from OTP Bank's perspective.

For the methodology of a more in-depth exploration and assessment of the risks and opportunities arising from the relevant topics, please refer to subsection 1.4 Materiality assessment – Identification and assessment of financial risks and opportunities in the OTP Group Sustainability Report.

Validation of the assessment and approval

The assessment of impacts, risks and opportunities was followed by a series of internal reviews. This included a review of the assessment of impacts below the materiality threshold, but close to it, in relation to the results corrected with stakeholder feedback.
The Hungarian subsidiaries as well as the relevant representatives of foreign subsidiaries provided feedback on the materiality assessment.
The ESG Sub-Committee discussed the list of material impacts, risks and opportunities and approved it by majority decision, subject to one modification, in accordance with the Sub-Committee's rules of procedure.

The OTP Group's Material Sustainability Impacts, risks and opportunities:

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/ Risk/opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[5]	Short-term	Medium term	Long-term
E1 Climate Change								
Climate Change Mitigation								
The OTP Group's impact stems from direct and indirect greenhouse gas emissions, exacerbating climate change. The OTP Group's indirect emissions related to its loan portfolio (Scope 3) exceed Scope 1–2 emissions by several orders of magnitude, and significant Scope 3 emissions are also associated with asset managers. Direct emissions from operations and indirect emissions from energy consumption (Scope 1–2) are relatively small for most companies, given that they provide financial or other services. However, due to the Group's size, these emissions are significant overall. This impact is material for the entire group. Several group members, which are significantly smaller compared to financial institutions,[6] operate in the agricultural and food sectors, as well as the real-estate sector, where these emissions are also relatively higher.	The Bank Group aims to facilitate climate change mitigation by reducing emissions associated with its lending and operations. By the end of 2024, it prepared a decarbonization (transition) plan for its loan portfolio. The Bank Group continuously aims to reduce its Scope 1-2 emissions, with emission reduction plans currently being prepared on a company-by-company basis, available for some subsidiaries by the end of 2024. In addition to efficiency measures, the use of green electric energy plays a significant role.	Actual negative impact		X	X	X	X	X
OTP Group, through its financial products, encourages the mitigation of climate change within its portfolio. Through its applied practices, the Bank Group also has a significant exemplary and awareness-raising impact, considering its wide customer base.		Actual positive impact		X	X	X	X	X
A significant business opportunity for the Bank Group is the expansion of green lending that facilitates climate change mitigation in the countries where it engages in corporate lending and retail mortgage lending (there is no active green lending according to OTP standards in Ukraine).		Opportunity			X	X	X	X
E1-SBM-3 18 This is material for the OTP Group's lending activities because, in connection with climate change mitigation, transition risks arise for a portion of the customer base, which indirectly also poses a risk to the Bank Group. The extent of this risk is estimated through stress testing of the corporate portfolio.	Risk management is conducted within the framework of ESG risk management.	Risk			X		X	X
Adaptation to Climate Change								
The OTP Group's lending practices impact adaptation, either facilitating (by expecting or supporting with favorable conditions), hindering, or remaining neutral towards clients' adaptation efforts. The need for adaptation is strongly necessary in several sectors within the portfolio (e.g. mortgage loans, agriculture, real-estate, construction sectors.	The Bank Group aims to facilitate adaptation to climate change through green lending. Risk management is conducted within the framework of ESG risk management.	Actaul positive impact			X	X	X	X
The Bank Group strives to leverage the business opportunity arising from lending that facilitates adaptation to climate change.		Opportunity			X		X	X
E1-SBM-3 This also includes the physical risks associated with lending activities, as well as some transition risks (investments necessary for adaptation).		Risk			X		X	X

[5] For client-related topics, we have indicated only where the impact depends on the client's practice, the influence of the Group is indirect.
[6] Revenue, balance sheet total, headcount.

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/ Risk/opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[5]	Short-term	Medium term	Long-term
Energy								
Through financing energy-intensive industries, the Bank Group influences the environmental impact of clients' activities.	Within green loans, these goals represent a particularly large proportion, and financing is also significant in the affected sectors. The Banking Group addresses this topic through the methods and tools presented in the previous two topics.	Actual negative impact			X	X	X	X
The Group has a positive impact by providing incentive loans for renewable, carbon-free energy sources considered green during the transition, and by encouraging energy efficiency.		Actual postive impact			X	X	X	X
Similar to climate change mitigation and adaptation, the business opportunity arises within green lending, where the expansion of the use of renewable and green-certified energy sources plays a significant role.		Opportunity			X		X	X
Financing energy-intensive and fossil fuel-using companies poses credit and reputational risks for OTP Bank and its subsidiaries.		Risk			X		X	X
E3 Water and Marine Resources								
Water Withdrawal								
In the OTP Group's corporate loan portfolio, the presence of sectors with high water withdrawal is significant. To better understand the impacts, it is necessary to investigate the practices employed by these companies.	There is an opportunity to finance these goals within green lending. The Bank Group's minimum expectation for its clients, which is monitored, is compliance with relevant environmental and social laws and regulations, as well as possessing the necessary permits and authorizations for their operations. Understanding clients' practices beyond these requirements is ongoing, in parallel with the evolving and strengthening regulatory expectations. Based on this, expectations that encourage responsible behavior can be formulated.	Actual negative impact			X	X	X	X
Green lending finances activities that have a positive impact.		Actual postive impact			X	X	X	X
Financial risk primarily arises in relation to those loan clients who are unable to adequately manage changing or existing environmental expectations (e.g., stricter regulations, changing consumer preferences, fines) or face difficulties in ensuring the water needs of their activities. A deeper understanding of the risk requires further analysis.		Risk			X	X	X	X
E4 Biodiversity and Ecosystems[7]								
The direct drivers of biodiversity loss								
In the corporate loan portfolio of the OTP Group, sectors potentially negatively impacting biodiversity and ecosystems are significant. To better understand these impacts, it is necessary to uncover the practices employed by the companies.	The minimum expectations set and monitored by the Bank Group for its clients include compliance with relevant environmental and social laws and regulations, as well as possessing the necessary permits and licenses for their operations (currently, there are significantly fewer requirements related to biodiversity compared to water).	Actual negative impact			X	X	X	X
The Banking Group indirectly influences the extent of these impacts through financing conditions and can encourage positive effects.	Understanding clients' practices beyond these requirements is ongoing alongside the evolving and strengthening regulatory expectations, which will form the basis for articulating expectations that encourage responsible behavior.	Potential positive impact			X	X	X	X

[7] E4 SBM-3 No significant negative impacts were identified in terms of lnd degradation, desertification/soil sealing.

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/ Risk/opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[5]	Short-term	Medium term	Long-term
S1 Own Workforce The OTP Group employs more than 43,000 people, making numerous impacts on its own workforce significant.								
Working conditions: Work-life balance								
The Bank Group influences work-life balance through the provision of overtime, flexible employment opportunities, and access to childcare facilities. The family-related commitments of female employees are typically stronger, and the fact that approximately two-thirds of the Group's employees are women amplifies these impacts.	At OTP Group, various employee benefits and support systems are continuously available to help maintain employee well-being. The measures focus on the areas of working hours and flexibility, holidays and absences, well-being and recreation.	Actual positive impact		X		X	X	X
The effects may be negative if OTP Group practices do not adequately take employee considerations into account.		Potential negative impact		X		X	X	X
Working conditions: Health and safety								
Stress emerges as a relevant risk for a significant portion of employees, considering that most staff at the member companies work in non-hazardous positions. Occupational safety risks are more significant in agricultural companies.	OTP Group operates occupational health and safety programs to maintain a safe and healthy working environment. It is a common, ongoing practice within the group to conduct regular, preventive health examinations for employees and stress management is also supported by action packages.	Actual negative impact		X		X	X	X
Equal treatment and equal opportunities: Gender equality and equal pay for work of equal value								
This is a topic that strongly influences employee well-being, made even more important by the high proportion of female employees. The corporate group monitors the pay ratio between men and women in the same positions, and at the parent bank and most subsidiaries, this difference is minimal.	OTP Bank has a strategy for creating gender equality, and several subsidiary banks have specific diversity policies in place. The majority of group members continuously implement measures to promote equal opportunities and diversity. Leadership training and internal awareness campaigns are implemented to strengthen an inclusive mindset.	Actual positive impact		X		X	X	X
The proportion of female managers is consistently lower at higher levels. At some subsidiary banks, the difference is greater for employees in the same position.		Actual negative impact		X		X	X	X
Equal treatment and equal opportunities: Training and skills development								
The OTP Group's training and skills development practices influence the sector and other employers due to its significant role as an employer. Access to training is always ensured. Performance evaluations at the Group's member companies follow different methodologies, with a smaller proportion of employees participating in this process at several member companies.	The OTP Group provides a wide training portfolio for its employees. Professional and personal development training, as well as other (e.g. mandatory) training, are typically conducted according to annual training plans. These plans are developed with employee involvement and take into account the results of performance evaluations. The results of the engagement survey show an average level in this area.	Actual positive impact		X		X	X	X
The impacts may be negative if OTP Group practices do not ensure equal access to training.		Potential negative impact		X			X	X
Equal treatment and equal opportunities: Employment and inclusion of persons with disabilities								
Due to its size and scope of activities (as a wide range of society interacts with its employees), the Bank Group could have a significant impact on the employment of persons w ith disabilities and the change in this employment culture.	The Bank Group prohibits all forms of discrimination, but measures to support the employment of persons with disabilities are not widely implemented.	Actual positive impact		X		X	X	X
Currently, the employment of these individuals is low at the group level.		Actual negative impact		X			X	X

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/ Risk/opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[5]	Short-term	Medium term	Long-term
Equal treatment and equal opportunities: Measures against violence and harassment in the workplace								
The large number of employees and the high proportion of female employees make this topic important, further emphasized by the lower proportion of female employees in higher positions (increasing the risk of abuse). No reported and confirmed cases of abuse have occurre.	The Bank Group implements measures related to the application of the Code of Ethics.	Potential negatve impact		X		X	X	X
Equal treatment and equal opportunities: Diversity								
Due to the significant number of employees, the member companies of the Banking Group have both the opportunity and the role to implement diversity. (This topic partially overlaps with gender equality and the employment of persons with disabilities.)	*See: Gender Equality and Equal Pay for Equal Work*	Actual positive impact		X		X	X	X
The Bank Group's practices provide room for improvement in implementing diversity.		Actaul negative impact		X			X	X
S4 Consumers and end-users These topics are material for member companies providing financial products and services.								
Information security and data protection[8]								
The banks within the Bank Group hold a large amount of sensitive data about their customers. By protecting personal data and implementing information security and cyber protection, the Banking Group has a positive impact on its customers.	Security systems and workflows are constantly evolving, and staff training is also regular. The Group aims to use the most modern solutions for data management, data security and data leakage prevention, supported by organizational development, technical, customer education and engaging measures. The parent bank continuously supports and monitors the anti-fraud efforts of its subsidiaries. The Bank Group's data management processes operate within a permanent framework, according to regular activities	Actual positive impact		X		X	X	X
Despite OTP Group's practices that prioritize safety and secure operations, it sometimes happens that customers suffer losses.		Actual negative impact		X		X	X	X
A breach of personal data protection, fraud, or violation of legal requirements, as well as successful attacks and incidents in the field of information security and cybersecurity, can cause significant losses to both the banks of the OTP Group and their customers. Data protection deficiencies, violations, and potential incidents not only carry the risk of significant financial penalties but can also lead to customer complaints and loss of customers. Consequently, the reputation of the banks would decrease.		Risk		X			X	X
Access to quality information[9]								
Quality information provision ensures objective information and understanding of financial products for all customers. Its implementation affects customers' well-being and financial situation, as a financial product can have a significant impact on a customer's life. This topic is primarily important for retail and SME customers, and its significance is even more pronounced for vulnerable social groups. The practices of the OTP Group have a positive impact.	Information and communication about banking products and services are highly regulated areas in most countries where the OTP Group operates. Responsible communication aims to ensure clarity and attract attention while adhering to these regulations. Member companies support good financial decisions and knowledge expansion through educational videos and calculators, among other tools. The Group's member companies are continuously improving the understandability of financial services.	Actual positive impact		X		X	X	X
Despite the efforts made, opportunities for development can always be identified, given the complexity of financial products, information obligations and their continuous changes.		Actual negative impacts		X		X	X	X

[8] ESRS: Impacts related to information disclosure on consumers and/or end-users: Privacy protection (ESRS 1 AR 16). At OTP Group, this topic includes not only the protection of personal data but also information security and cyber defense, as these are interconnected topics within the Bank Group. However, the ESRS does not specifically name the latter

[9] ESRS: Impacts related to information disclosure on consumers and/or end-users: Access to (quality) information (ESRS 1 AR 16).

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/ Risk/opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[5]	Short-term	Medium term	Long-term
Access to financial products and services[10]								
Access to financial products and services can support customers' well-being and prosperity. In addition,access for residents of disadvantaged areas and those in disadvantaged social situations ismaterial. Ensuring access to financial products for disadvantaged customers requires careful consideration and strict regulation to protect the interests of depositors and prevent excessive indebtedness. The Bank Group can also support adequate housing, as mortgage loans are an important market segment in most areas of operation.	At the group level, the goal is to expand the range of products that are partially or fully available digitally, ensuring that these processes are as convenient and accessible to as many customers as possible. These solutions can also facilitate access for residents of disadvantaged areas. The Bank Group pays attention to imparting knowledge related to the use of online channels. Accessibility is continuously improving.	Actual positive impact		X		X	X	X
The accessibility cannot be considered comprehensive.	In addition to market-based products, the Bank Group ensures the availability of significant state-supported mortgage loan schemes in several countries.	Actual negative impact		X		X	X	X
G1 Business Conduct								
Corporate culture, compliance, anti-money laundering								
The business conduct of the OTP Group not only affects its direct partners and stakeholders but also influences the attitude of employees and customers towards ethical business conduct. Corporate governance characteristics and transparent decision-making are also important to investors. The fight against money laundering is essential for the banks within the Bank Group, aiming to prevent customers' attempts at money laundering. From a societal perspective, careful and prudent practice is particularly important. Implementing ethical business conduct and ensuring legal operations are of utmost importance to OTP Group.	The foundations and guidelines for ethical business conduct are summarized in the Code of Ethics. OTP Group operates an ethics reporting system and conducts annual ethics training for all employees. The Bank Group conducts regular mandatory training to increase the awareness of its relevant employees on AML/CFT. OTP Bank operates a separate whistle-blowing system in relation to AML/CFT.	Actual positive impact		X		X	X	X
Despite the OTP Group's emphasis on striving for ethical business operations, non-compliances cannot be completely eliminated.		Actual negative impact		X			X	X
Non-compliance with laws and regulations can result in fines and reputational loss. Banks are also expected to play an active role in preventing money laundering. Violating anti-money laundering rules can lead to liquidity problems and the termination of correspondent banking relationships. Breaching business ethics rules can cause dissatisfaction and complaints from employees and business partners.		Risk		X		X	X	X
Corruption and bribery								
The effectiveness of corruption prevention impacts the efficiency of resource utilization. Due to its size, the OTP Group's anti-corruption practices can influence economic morale (especially within the sector). The practices implemented by OTP Group have a positive impact.	The fight against corruption is supported by an anti-corruption training system, the application of an anti-corruption clause among contractual partners, the expansion of which at group level is in progress, and regular risk assessments.	Actual positive impact		X		X	X	X
Even with careful and constantly evolving practices, abuse can occur.		Potential negative impact		X		X	X	X

[10] ESRS: Social inclusion of consumers and/or end-users: Access to products and services (ESRS 1 AR 16).

The material sustainability impacts identified by the OTP Group, which are related to financial services (mostly lending activities), have been identified as impacts, risks and opportunities that are also assessed as relevant to the core business of OTP Bank. The material impacts identified by the OTP Group are detailed in subsection 1.4 Materiality assessment – Material sustainability impacts of the OTP Group in the OTP Group Sustainability Report.

As regards the management of the potential financial impact of ESG-related risks, no provision was made for ESG-related risks during 2024 and no capital buffer was set by the management for such risks. Operational risks are flagged (ESG flag) in the context of loss data collection if an ESG risk factor can be identified behind the loss event. No significant losses on material issues were realised in 2024. An analysis of the expected financial impacts and an estimate of the expected financial impacts will be made in 2025.

OTP Bank's risk management processes, prudent behaviour and business planning practices ensure its resilience to manage sustainability impacts, risks and take opportunities. The Bank, as part of the Group, carried out a stress test to assess the potential impact of climate change, which was justified by both regulatory and business considerations (see subsection 2.4.2 Credit Risk – Stress test in the OTP Group Sustainability Report). No resilience assessment was carried out for the biodiversity and ecosystem themes, which were not considered to be financially material. Addressing complex environmental challenges adequately also requires the involvement of the banking sector, and further resilience analyses are likely to be warranted in the future. The Bank continuously monitors market opportunities to take advantage of them and keeps abreast of regulatory requirements to ensure that it can respond appropriately.

OTP Bank has not previously prepared a sustainability report at an individual level, its activities were presented as part of the group-level consolidated report, in accordance with GRI Standard 2021.

OTP Bank follows the application of group-level entity specific disclosures (@ESRS Index) to characterise the impact of the following material topics:

- Water withdrawal – material regarding the value chain, entity-specific disclosure will be developed later
- Direct drivers of biodiversity loss – material regarding the value chain, entity-specific disclosure will be developed later
- Information security and data protection
- Quality information
- Access to financial products and services
- Corporate culture, compliance, fight against money laundering

1.5 List of ESRS requirements covered and general reporting policy

ESRS 2 IRO-2

In preparing its sustainability statement, OTP Bank has determined the list of disclosure requirements based on the results of the materiality assessment carried out by the Group, which are also relevant at an individual level. OTP Bank, as the parent bank, manages and coordinates the group-wide reporting processes and the development of methodological approaches to data collection and disclosure. Thus, in its reporting at the individual level, it also follows the practice developed at the group level (to the extent of OTP Bank), which is presented in subsection 1.5 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement and general reporting policy in the OTP Group Sustainability Report.

Among the disclosure requirements and data points in the ESRS thematic standards, the disclosure requirements that are linked to subtopic material for OTP Bank are presented in the individual report, based on the identification of data points at the group level and the interpretation of the data point expectations (based on guidelines EFRAG ID 177 – Links between AR16 and Disclosure requirements). The Bank has also developed a group-level reporting practice for individual level disclosures, which are indicated under the chapters Data Points, Policy, Action, Target, Metrics, Entity-specific Disclosures (subsection 1.5 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement and general reporting policy in the OTP Group Sustainability Report), covering OTP Bank (parent bank). Where the information for the Group is also applicable to the Bank, the information is presented by referring back to the group-level report.

The use of individual-level ESRS requirements, related references and phase-in options, as well as the tabulation of data points from EU legislation, are presented in chapter 5. ESRS Index.

2. Environmental information

2.1 Publications under the Taxonomy Regulation

2.1.1 Disclosure under the EU Taxonomy Regulation

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation:

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI*	KPI**	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Main KPI	**Green asset ratio (GAR) stock**	**21,669**	**66,252**	**0.17%**	**0.51%**	**68.25%**	**33.43%**	**31.75%**

* Based on the Turnover KPI of the counterparty.
** Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used.
*** % of assets covered by the KPI over banks' total assets.

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	8,779	33,225	0.32%	1.20%	89.52%	23.47%	10.48%
	Financials guarantees	0	0	0.00%	0.00%			
	Asset under management	0	0	0.00%	0.00%			

Notes:
- Across the reporting templates: cells shaded in grey should not be reported.
- Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs' inclusion in these KPI will only apply subject to a positive result of an impact assessment.

1. Assets for the calculation of GAR – Turnover-based data:

	HUF million	Disclosure reference date 31 December 2024													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Total (gross) carrying amount	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6,588,317	66,779	21,663	146	5,702	11,930	31	6	0	0	884	0	0	0
2	**Financial undertakings**	4,415,867	17,225	667	146	146	346	31	6	0	0	0	0	0	0
3	Credit institutions	3,581,461	17,225	667	146	146	346	31	6	0	0	0	0	0	0
4	Loans and advances	3,190,833	17,225	667	146	146	346	31	6	0	0	0	0	0	0
5	Debt securities, including UoP	390,628	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
7	Other financial corporations	834,405	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
16	of which insurance undertakings	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
20	**Non-financial undertakings**	317,186	33,626	20,996	0	5,555	11,584	0	0	0	0	884	0	0	0
21	Loans and advances	317,186	33,626	20,996	0	5,555	11,584	0	0	0	0	884	0	0	0
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
24	**Households**	1,855,264	15,928	0	0	0	0	0	0	0	0				
25	of which loans collateralised by residential immovable property	44,356	14,881	0	0	0	0	0	0	0	0				
26	of which building renovation loans	1,047	1,047	0	0	0	0	0	0	0	0				
27	of which motor vehicle loans	0	0	0	0	0	0								
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2024													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Total (gross) carrying amount	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	6,327,477													
33	**Financial and non-financial undertakings**	3,047,538													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	2,846,798													
35	Loans and advances	2,447,767													
36	of which loans collateralised by commercial immovable property	0													
37	of which building renovation loans	0													
38	Debt securities	332,645													
39	Equity instruments	66,386													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	200,740													
41	Loans and advances	200,740													
42	Debt securities	0													
43	Equity instruments	0													
44	**Derivatives**	47,425													
45	**On demand interbank loans**	123,681													
46	**Cash and cash-related assets**	125,765													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	2,983,067													
48	**Total GAR assets**	12,915,794	66,779	21,663	146	5,702	11,930	31	6	0	0	884	0	0	0
49	**Assets not covered for GAR calculation**	6,009,433													
50	**Central governments and Supranational issuers**	3,506,456													
51	**Central banks' exposure**	1,872,566													
52	**Trading book**	630,412													
53	**Total assets**	18,925,227	66,779	21,663	146	5,702	11,930	31	6	0	0	884	0	0	0
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	0	0	0	0	0	0	0	0	0	0	0			
55	Assets under management														
56	Of which debt securities														
57	Of which equity instruments														

	HUF million	Disclosure reference date 31 December 2024																	
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6,588,317	114	0	0	0	0	0	0	0	1	0	0	0	67,809	21,669	146	5,702	11,930
2	**Financial undertakings**	4,415,867	0	0	0	0	0	0	0	0	0	0	0	0	17,257	673	146	146	346
3	Credit institutions	3,581,461	0	0	0	0	0	0	0	0	0	0	0	0	17,257	673	146	146	346
4	Loans and advances	3,190,833	0	0	0	0	0	0	0	0	0	0	0	0	17,257	673	146	146	346
5	Debt securities, including UoP	390,628	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	834,405	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
20	**Non-financial undertakings**	317,186	114	0	0	0	0	0	0	0	1	0	0	0	34,625	20,996	0	5,555	11,584
21	Loans and advances	317,186	114	0	0	0	0	0	0	0	1	0	0	0	34,625	20,996	0	5,555	11,584
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	**Households**	1,855,264	0	0	0	0									15,928	0	0	0	0
25	of which loans collateralised by residential immovable property	44,356	0	0	0	0									14,881	0	0	0	0
26	of which building renovation loans	1,047	0	0	0	0									1,047	0	0	0	0
27	of which motor vehicle loans	0													0	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2024																	
			Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
		Total (gross) carrying amount	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	6,327,477																	
33	**Financial and non-financial undertakings**	3,047,538																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	2,846,798																	
35	Loans and advances	2,447,767																	
36	of which loans collateralised by commercial immovable property	0																	
37	of which building renovation loans	0																	
38	Debt securities	332,645																	
39	Equity instruments	66,386																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	200,740																	
41	Loans and advances	200,740																	
42	Debt securities	0																	
43	Equity instruments	0																	
44	**Derivatives**	47,425																	
45	**On demand interbank loans**	123,681																	
46	**Cash and cash-related assets**	125,765																	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	2,983,067																	
48	**Total GAR assets**	12,915,794	114	0	0	0	0	0	0	0	1	0	0	0	67,809	21,669	146	5,702	11,930
49	**Assets not covered for GAR calculation**	6,009,433																	
50	**Central governments and Supranational issuers**	3,506,456																	
51	**Central banks' exposure**	1,872,566																	
52	**Trading book**	630,412																	
53	**Total assets**	18,925,227	114	0	0	0	0	0	0	0	1	0	0	0	67,809	21,669	146	5,702	11,930
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	0	0				0				0				0	0	0	0	0
55	Assets under management																		
56	Of which debt securities																		
57	Of which equity instruments																		

1. Assets for the calculation of GAR – CapEx-based:

	HUF million	Disclosure reference date 31 December 2024													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Total (gross) carrying amount	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6,588,317	113,300	66,233	136	40,693	10,410	69	19	0	0	0	0	0	0
2	**Financial undertakings**	4,415,867	18,171	1,230	136	263	553	69	19	0	0	0	0	0	0
3	Credit institutions	3,581,461	18,171	1,230	136	263	553	69	19	0	0	0	0	0	0
4	Loans and advances	3,190,833	18,171	1,230	136	263	553	69	19	0	0	0	0	0	0
5	Debt securities, including UoP	390,628	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
7	Other financial corporations	834,405	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
16	of which insurance undertakings	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
20	**Non-financial undertakings**	317,186	79,201	65,002	0	40,430	9,857	0	0	0	0	0	0	0	0
21	Loans and advances	317,186	79,201	65,002	0	40,430	9,857	0	0	0	0	0	0	0	0
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
24	**Households**	1,855,264	15,928	0	0	0	0	0	0	0	0				
25	of which loans collateralised by residential immovable property	44,356	14,881	0	0	0	0	0	0	0	0				
26	of which building renovation loans	1,047	1,047	0	0	0	0	0	0	0	0				
27	of which motor vehicle loans	0	0	0	0	0	0								
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Total (gross) carrying amount	Disclosure reference date 31 December 2024												
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	6,327,477													
33	**Financial and non-financial undertakings**	3,047,538													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	2,846,798													
35	Loans and advances	2,447,767													
36	of which loans collateralised by commercial immovable property	0													
37	of which building renovation loans	0													
38	Debt securities	332,645													
39	Equity instruments	66,386													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	200,740													
41	Loans and advances	200,740													
42	Debt securities	0													
43	Equity instruments	0													
44	**Derivatives**	47,425													
45	**On demand interbank loans**	123,681													
46	**Cash and cash-related assets**	125,765													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	2,983,067													
48	**Total GAR assets**	12,915,794	113,300	66,233	136	40,693	10,410	69	19	0	0	0	0	0	0
49	**Assets not covered for GAR calculation**	6,009,433													
50	**Central governments and Supranational issuers**	3,506,456													
51	**Central banks' exposure**	1,872,566													
52	**Trading book**	630,412													
53	**Total assets**	18,925,227	113,300	66,233	136	40,693	10,410	69	19	0	0	0			
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	0	0	0	0	0	0	0	0	0	0	0			
55	Assets under management	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	Of which debt securities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2024																	
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6,588,317	2,358	0	0	0	0	0	0	0	3	0	0	0	115,729	66,252	136	40,693	10,410
2	**Financial undertakings**	4,415,867	0	0	0	0	0	0	0	0	0	0	0	0	18,240	1,250	136	263	553
3	Credit institutions	3,581,461	0	0	0	0	0	0	0	0	0	0	0	0	18,240	1,250	136	263	553
4	Loans and advances	3,190,833	0	0	0	0	0	0	0	0	0	0	0	0	18,240	1,250	136	263	553
5	Debt securities, including UoP	390,628	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	834,405	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	459,120	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
20	**Non-financial undertakings**	317,186	2,358	0	0	0	0	0	0	0	3	0	0	0	81,562	65,002	0	40,430	9,857
21	Loans and advances	317,186	2,358	0	0	0	0	0	0	0	3	0	0	0	81,562	65,002	0	40,430	9,857
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	**Households**	1,855,264	0	0	0	0									15,928	0	0	0	0
25	of which loans collateralised by residential immovable property	44,356	0	0	0	0									14,881	0	0	0	0
26	of which building renovation loans	1,047	0	0	0	0									1,047	0	0	0	0
27	of which motor vehicle loans	0													0	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2024																	
			Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
		Total (gross) carrying amount	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	6,327,477																	
33	**Financial and non-financial undertakings**	3,047,538																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	2,846,798																	
35	Loans and advances	2,447,767																	
36	of which loans collateralised by commercial immovable property	0																	
37	of which building renovation loans	0																	
38	Debt securities	332,645																	
39	Equity instruments	66,386																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	200,740																	
41	Loans and advances	200,740																	
42	Debt securities	0																	
43	Equity instruments	0																	
44	**Derivatives**	47,425																	
45	**On demand interbank loans**	123,681																	
46	**Cash and cash-related assets**	125,765																	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	2,983,067																	
48	**Total GAR assets**	12,915,794	2,358	0	0	0	0	0	0	0	3	0	0	0	115,729	66,252	136	40,693	10,410
49	**Assets not covered for GAR calculation**	6,009,433																	
50	**Central governments and Supranational issuers**	3,506,456																	
51	**Central banks' exposure**	1,872,566																	
52	**Trading book**	630,412																	
53	**Total assets**	18,925,227	2,358				0				3				115,729	66,252	136	40,693	10,410
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	0	0				0				0				0	0	0	0	0
55	Assets under management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	Of which debt securities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2. GAR Sector information – Turnover-based data:

	Breakdown by sector – NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (WTR)	HUF million	of which environmentally sustainable (WTR)
1	7022	131	3							24			
2	2932	62	30										
3	2511												
4	1920	5	0							1			
5	4711	40	8										
6	4730												
7	4646												
8	2120												
9	1062	3,444	3,251										
10	2016	20	0							4			
11	3811	64	2							12			
12	2059	2,524	62							467			
13	4531												
14	2720	0											
15	1039												
16	3511	9,066	1,994										
17	4519	72	2							13			
18	4931	1,354	33							251			
19	3523	224	205										
20	6420	5,502	5,044										
21	4950	0	0							0			
22	2910	0	0							0			
23	5510												
24	7010	9,494	9,494										
25	8020	15	0							3			
26	5310												
27	6492	587	14							109			
28	3514	0	0										
29	2442												
30	3513	17	17										
31	6110	64	1										
32	6120												
33	6203												
34	4520												
35	1082												
36	2351												
37	2221												
38	0520												
39	3522	7	4							0			
40	6820	21	19										
41	6831												
42	3020	17	8										
43	3512	867	794										
44	2443												
45	4671												
46	6920	1	1										
47	8220	8	8										
48	6209	18	0										
49	2012												
50	6201												

	Breakdown by sector – NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	7022													156	3		
2	2932													62	30		
3	2511																
4	1920													6	0		
5	4711													40	8		
6	4730																
7	4646																
8	2120																
9	1062													3,444	3,251		
10	2016													24	0		
11	3811													76	2		
12	2059													2,992	62		
13	4531																
14	2720													0			
15	1039																
16	3511													9,066	1,994		
17	4519													86	2		
18	4931													1,605	33		
19	3523													224	205		
20	6420													5,502	5,044		
21	4950													0	0		
22	2910													0	0		
23	5510																
24	7010													9,494	9,494		
25	8020													18	0		
26	5310																
27	6492													696	14		
28	3514													0	0		
29	2442																
30	3513													17	17		
31	6110	89												153	1		
32	6120																
33	6203																
34	4520																
35	1082																
36	2351																
37	2221																
38	0520																
39	3522					0				1				8	4		
40	6820													21	19		
41	6831																
42	3020													17	8		
43	3512													867	794		
44	2443																
45	4671																
46	6920													1	1		
47	8220													8	8		
48	6209	25												43	0		
49	2012																
50	6201																

2. GAR Sector information – CapEx-based:

	Breakdown by sector – NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (WTR)	HUF million	of which environmentally sustainable (WTR)
1	7022	326	139										
2	2932	53	18										
3	2511												
4	1920	13	5										
5	4711	1,126	185										
6	4730												
7	4646												
8	2120												
9	1062	3,958	3,617										
10	2016	50	21										
11	3811	160	68										
12	2059	6,264	2,680										
13	4531												
14	2720	0											
15	1039												
16	3511	9,066	5,077										
17	4519	179	77										
18	4931	3,361	1,438										
19	3523	559	522										
20	6420	13,755	12,838										
21	4950	0	0										
22	2910	0	0										
23	5510												
24	7010	36,476	35,477										
25	8020	38	16										
26	5310												
27	6492	1,456	623										
28	3514	1	1										
29	2442												
30	3513	64	63										
31	6110	13	13										
32	6120												
33	6203												
34	4520												
35	1082												
36	2351												
37	2221												
38	0520												
39	3522	9	9										
40	6820	52	49										
41	6831												
42	3020	15	5										
43	3512	2,167	2,022										
44	2443												
45	4671												
46	6920	3	3										
47	8220	32	31										
48	6209	4	4										
49	2012												
50	6201												

	Breakdown by sector – NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	7022	65												391	139		
2	2932													53	18		
3	2511																
4	1920	3												15	5		
5	4711													1,126	185		
6	4730																
7	4646																
8	2120																
9	1062													3,958	3,617		
10	2016	10												60	21		
11	3811	32												192	68		
12	2059	1,247												7,511	2,680		
13	4531																
14	2720													0			
15	1039																
16	3511													9,066	5,077		
17	4519	36												215	77		
18	4931	669												4,029	1,438		
19	3523													559	522		
20	6420													13,755	12,838		
21	4950	0												0	0		
22	2910	0												0	0		
23	5510																
24	7010													36,476	35,477		
25	8020	8												46	16		
26	5310																
27	6492	290												1,746	623		
28	3514													1	1		
29	2442																
30	3513													64	63		
31	6110													13	13		
32	6120																
33	6203																
34	4520																
35	1082																
36	2351																
37	2221																
38	0520																
39	3522									3				12	9		
40	6820													52	49		
41	6831																
42	3020													15	5		
43	3512													2,167	2,022		
44	2443																
45	4671																
46	6920													3	3		
47	8220													32	31		
48	6209													4	4		
49	2012																
50	6201																

3. GAR KPI Stock – Turnover-based data:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1.0%	0.3%	0.0%	0.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	10.6%	6.6%	0.0%	1.8%	3.7%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%
21	Loans and advances	10.6%	6.6%	0.0%	1.8%	3.7%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	33.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	0.5%	0.2%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.3%	0.0%	0.1%	0.2%	34.81%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	23.33%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	18.92%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	16.86%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.06%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.41%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.43%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.43%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	10.9%	6.6%	0.0%	1.8%	3.7%	1.68%
21	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	10.9%	6.6%	0.0%	1.8%	3.7%	1.68%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									0.9%	0.0%	0.0%	0.0%	0.0%	9.80%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									33.5%	0.0%	0.0%	0.0%	0.0%	0.23%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									100.0%	0.0%	0.0%	0.0%	0.0%	0.01%
27	of which motor vehicle loans													0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.2%	0.0%	0.0%	0.1%	68.25%

3. GAR KPI Stock – CapEx-based:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1.7%	1.0%	0.0%	0.6%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	25.0%	20.5%	0.0%	12.7%	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	Loans and advances	25.0%	20.5%	0.0%	12.7%	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	33.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	0.9%	0.5%	0.0%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.8%	1.0%	0.0%	0.6%	0.2%	34.81%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	23.33%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	18.92%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	16.86%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.06%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.41%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.43%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.43%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.7%	20.5%	0.0%	12.7%	3.1%	1.68%
21	Loans and advances	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.7%	20.5%	0.0%	12.7%	3.1%	1.68%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									0.9%	0.0%	0.0%	0.0%	0.0%	9.80%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									33.5%	0.0%	0.0%	0.0%	0.0%	0.23%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									100.0%	0.0%	0.0%	0.0%	0.0%	0.01%
27	of which motor vehicle loans													0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.5%	0.0%	0.3%	0.1%	68.2%

4.2 GAR KPI Stock – Turnover-based data:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.5%	0.4%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	7.0%	5.7%	0.0%	0.5%	4.9%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%
21	Loans and advances	7.0%	5.7%	0.0%	0.5%	4.9%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	0.4%	0.3%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.4%	0.0%	0.0%	0.4%	66.05%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	47.46%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	32.40%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	32.40%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	15.07%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.89%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.89%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.3%	5.7%	0.0%	0.5%	4.9%	4.95%
21	Loans and advances	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.3%	5.7%	0.0%	0.5%	4.9%	4.95%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									0.0%	0.0%	0.0%	0.0%	0.0%	13.65%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									1.4%	0.0%	0.0%	0.0%	0.0%	0.02%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
27	of which motor vehicle loans													0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.3%	0.0%	0.0%	0.3%	89.52%

4.2 GAR KPI Stock – CapEx-based:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1.9%	1.6%	0.0%	1.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	24.7%	21.7%	0.0%	17.3%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	Loans and advances	24.7%	21.7%	0.0%	17.3%	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	1.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	1.4%	1.2%	0.0%	1.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.9%	1.6%	0.0%	1.3%	0.1%	66.05%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	47.46%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	32.40%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	32.40%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	15.07%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.89%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.89%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.3%	21.7%	0.0%	17.3%	1.4%	4.95%
21	Loans and advances	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.3%	21.7%	0.0%	17.3%	1.4%	4.95%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									0.0%	0.0%	0.0%	0.0%	0.0%	13.65%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									1.4%	0.0%	0.0%	0.0%	0.0%	0.02%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
27	of which motor vehicle loans													0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%	1.2%	0.0%	1.0%	0.1%	89.52%

5. KPI off-balance sheet exposures (Stock) – Turnover-based data:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
			of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

5. KPI off-balance sheet exposures (Stock) – CapEx-based:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
			of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

5.2 KPI off-balance sheet exposures (Flow) – Turnover-based data:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024 – Climate Change Mitigation (CCM): of which towards taxonomy relevant sectors (Taxonomy-eligible)	CCM: of which environmentally sustainable (Taxonomy-aligned)	CCM: of which use of proceeds	CCM: of which transitional	CCM: of which enabling	Climate Change Adaptation (CCA): of which towards taxonomy relevant sectors (Taxonomy-eligible)	CCA: of which environmentally sustainable (Taxonomy-aligned)	CCA: of which use of proceeds	CCA: of which enabling	Water and marine resources (WTR): of which towards taxonomy relevant sectors (Taxonomy-eligible)	WTR: of which environmentally sustainable (Taxonomy-aligned)	WTR: of which use of proceeds	WTR: of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024 – Circular economy (CE): of which towards taxonomy relevant sectors (Taxonomy-eligible)	CE: of which environmentally sustainable (Taxonomy-aligned)	CE: of which use of proceeds	CE: of which enabling	Pollution (PPC): of which towards taxonomy relevant sectors (Taxonomy-eligible)	PPC: of which environmentally sustainable (Taxonomy-aligned)	PPC: of which use of proceeds	PPC: of which enabling	Biodiversity and Ecosystems (BIO): of which towards taxonomy relevant sectors (Taxonomy-eligible)	BIO: of which environmentally sustainable (Taxonomy-aligned)	BIO: of which use of proceeds	BIO: of which enabling	Total (CCM + CCA + WTR + CE + PPC + BIO): of which towards taxonomy relevant sectors (Taxonomy-eligible)	Total: of which environmentally sustainable (Taxonomy-aligned)	Total: of which use of proceeds	Total: of which transitional	Total: of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

5.2 KPI off-balance sheet exposures (Flow) – CapEx-based:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024 – Climate Change Mitigation (CCM): of which towards taxonomy relevant sectors (Taxonomy-eligible)	CCM: of which environmentally sustainable (Taxonomy-aligned)	CCM: of which use of proceeds	CCM: of which transitional	CCM: of which enabling	Climate Change Adaptation (CCA): of which towards taxonomy relevant sectors (Taxonomy-eligible)	CCA: of which environmentally sustainable (Taxonomy-aligned)	CCA: of which use of proceeds	CCA: of which enabling	Water and marine resources (WTR): of which towards taxonomy relevant sectors (Taxonomy-eligible)	WTR: of which environmentally sustainable (Taxonomy-aligned)	WTR: of which use of proceeds	WTR: of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024 – Circular economy (CE): of which towards taxonomy relevant sectors (Taxonomy-eligible)	CE: of which environmentally sustainable (Taxonomy-aligned)	CE: of which use of proceeds	CE: of which enabling	Pollution (PPC): of which towards taxonomy relevant sectors (Taxonomy-eligible)	PPC: of which environmentally sustainable (Taxonomy-aligned)	PPC: of which use of proceeds	PPC: of which enabling	Biodiversity and Ecosystems (BIO): of which towards taxonomy relevant sectors (Taxonomy-eligible)	BIO: of which environmentally sustainable (Taxonomy-aligned)	BIO: of which use of proceeds	BIO: of which enabling	Total (CCM + CCA + WTR + CE + PPC + BIO): of which towards taxonomy relevant sectors (Taxonomy-eligible)	Total: of which environmentally sustainable (Taxonomy-aligned)	Total: of which use of proceeds	Total: of which transitional	Total: of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

2.2 Climate change and environment

Climate Change: Mitigation of Climate Change – Impacts, Risks and Opportunities

The impact of OTP Bank arises from direct and indirect greenhouse gas emissions, exacerbating climate change. The direct emissions from operations and indirect emissions from energy consumption (Scope 1–2) are relatively small. However, the indirect emissions associated with OTP Bank's loan portfolio (Scope 3) exceed Scope 1–2 emissions by several orders of magnitude.

In addition to emissions, the exemplary and awareness-raising impact that can be represented through its practices is also significant, considering the Bank's wide customer base.

Expanding green lending to facilitate climate change mitigation represents a significant business opportunity for the Bank.

It is significant for OTP Bank's lending activities because, in relation to climate change mitigation, a transition risk arises for a portion of its customer base, which indirectly poses a risk to the Bank as well. The extent of this risk is estimated through stress testing in relation to the corporate portfolio.

Mitigating climate change as a material topic at OTP Bank

The Bank Group aims to facilitate climate change mitigation by reducing emissions associated with its lending and own operations, a goal supported by OTP Bank as well.

At the end of 2024, a climate target was set for the loan portfolio, and the OTP Group also aims to play a leading financing role in the green and just transition in the long-term.

In the ESG strategy, a KPI has been set for green lending for the period up to 2025: OTP plans to build a green loan portfolio of HUF 1500 billion by 2025. The portfolio is continuously growing, with the OTP Group's balance sheet green exposure amounting to HUF 1027 billion at the end of 2024.

The green lending targets are currently linked to the EU Taxonomy's mitigation and adaptation goals. The key sectors for green lending in the group's portfolio are: energy (renewable energy production, distribution, storage, and related lending goals), real-estate (construction, purchase, and sale of green properties, as well as financing renovations that result in significant building energy improvements), and transportation (electro-mobility).

In terms of green lending, the Bank strives to take advantage of regulatory incentives.

The Bank continuously strives to reduce its Scope 1–2 emissions. In addition to efficiency-enhancing actions, the use of green electric energy plays a significant role.

OTP Bank has incorporated ESG risks into its risk management policies and procedures at the group level, enabling the identification and management of these risks to minimize emerging credit, reputational, regulatory, and legal risks. The management of ESG risks is integrated into various levels of the risk ecosystem. Since 2021, the Bank has been applying its ESG risk management framework in corporate lending to address the credit risk aspect of ESG risks.

Risks arising from the Bank's own operations are managed within the framework of operational risks. The assessment of these risks is carried out through the Annual Group-level Risk and Control Self-Assessment and scenario analysis, based on the results of which risk mitigation actions are determined.

Climate Change: Adaptation to Climate Change – Impacts, Risks and Opportunities

OTP Bank's lending practices impact adaptation, either by facilitating (expecting or supporting with favorable conditions), hindering, or remaining neutral towards customers' adaptation efforts. The necessity for adaptation is strongly required in several sectors within the portfolio (e.g., housing loans, agriculture, real-estate, construction sectors).

The Bank strives to utilize the business opportunities arising from lending that facilitates adaptation to climate change.

The physical risks associated with lending activities, as well as some of the transition risks (investments necessary for adaptation), are also related to this.

Managing climate change adaptation as a material topic at OTP Bank

The Bank strives to support adaptation to climate change through green lending. Risk management is conducted within the framework of ESG risk management.

Climate Change: Energy –Impacts, Risks and Opportunities

Through the financing of energy-intensive industries, the Bank influences the environmental impact of its clients' activities. By providing loans that encourage the use of renewable, carbon-free, and transitionally green energy sources, the Bank significantly contributes to mitigating this impact. These goals represent a substantial proportion of green loans, and financing in these sectors is also significant. Similar to climate change mitigation and adaptation, business opportunities arise within green lending, where expanding the use of renewable and green-certified energy sources plays a significant role.
Financing energy-intensive and fossil fuel-using companies poses credit and reputational risks for OTP Bank.

Managing energy as a material topic at OTP Bank

The Bank addresses this topic through the methods and tools presented in the previous two topics.
30.23% of the Bank's green loan portfolio finances renewable energy.

Water and Marine Resources: Water Withdrawal – Impacts, Risks and Opportunities

In OTP Bank's corporate loan portfolio, the presence of sectors with high water withdrawal is significant. To better understand the impacts, it is necessary to explore the practices employed by these companies.

Financial risk primarily arises in relation to those clients who are unable to adequately manage changing or existing environmental expectations (e.g., tightening regulations, shifting consumer preferences, fines), or whose activities face difficulties in ensuring water supply. A deeper understanding of the risk requires further analysis.

Managing water withdrawal is a material topic at OTP Bank

The minimum expectations imposed and monitored by the Bank towards its clients include compliance with relevant environmental and social laws and regulations, as well as possessing the necessary permits and authorizations for their operations. Understanding clients' practices beyond these requirements is ongoing alongside the evolving and strengthening regulatory expectations, based on which expectations promoting responsible behavior can be formulated. There is an opportunity to finance these goals within green lending. The Banking Group's minimum expectation for its clients, which is monitored, is compliance with relevant environmental and social laws and regulations, as well as possessing the necessary permits and authorizations for their operations. Understanding clients' practices beyond these requirements is ongoing, in parallel with the evolving and strengthening regulatory expectations. Based on this, expectations that encourage responsible behavior can be formulated.
Risk management is conducted within the framework of ESG risk management.

Biodiversity and ecosystems: Direct impact drivers of biodiversity loss – impacts, risks and opportunities

The presence of sectors potentially having a negative impact on biodiversity and ecosystems is significant in OTP Bank's corporate loan portfolio. The Bank indirectly influences the extent of these impacts through its financing conditions and can also encourage positive impacts. A more precise understanding of these impacts requires uncovering the practices employed by the companies.

Managing direct impact drivers of biodiversity loss as a material topic at OTP Bank

The minimum expectations imposed and monitored by the Bank towards its clients include compliance with relevant environmental and social laws and regulations, as well as possessing the necessary permits and authorizations for their operations (currently, there are significantly fewer requirements related to biodiversity compared to water). Understanding clients' practices beyond these requirements is ongoing alongside the evolving and strengthening regulatory expectations, based on which expectations promoting responsible behavior can be formulated.

ESRS E1-2, E3-1, E4-2: Policies

The OTP Group has a Group Credit Risk Policy and a Corporate Lending Policy/Operational Lending Limits and Guidelines, which also apply to OTP Bank. A detailed description of the policies can be found in subsection 2.2 Climate change and environment – Policies in the OTP Group Sustainability Report.

OTP Bank does not have a policy on water and biodiversity and ecosystems. The development of policies on water and biodiversity and ecosystems should be preceded by a deeper analysis of the risks involved in these two areas.

In addition, the OTP Group's Code of Ethics declares the Group's commitment to environmental sustainability and environmental values (see Governance Information).

ESRS E1-4, E3-3, E4-4, E1-9: Targets

OTP Bank also contributes to the Group's two main climate change targets: GHG emission reduction target concerning the portfolio defined under **climate targeting,** and the **green lending** target[11]. The content of these is briefly described below.

Climate targeting

In line with regulatory requirements, a plan to reduce the OTP Group's financed GHG emissions was defined in 2024. The plan sets targets to be achieved by 2030, based on the International Energy Agency's (IEA) Net Zero 2050 (NZE 2050) scenarios and national decarbonisation plans, and takes into account the current portfolio composition of OTP Group. OTP Bank follows the targets set by the Group, which are described in detail in subsection 2.2 Climate and Environment – Targets in the OTP Group Sustainability Report.

Actions to reduce financed emissions

The OTP Group continuously monitors progress towards the 2030 climate target, taking into account whether external conditions allow the target to be met.

In order to achieve its target, the OTP Group has set actions to reduce its financed emissions, which are also being followed by OTP Bank. A detailed description of the actions can be found in subsection 2.2 Climate change and environment – Actions to mitigate financed emissions of the OTP Group Sustainability Report.

Approval of the climate target document by the Executive Steering Committee is planned for 05.02.2025.

Green lending target

OTP Bank also contributes to the OTP Group's goal, declared in its ESG strategy in 2021 and unchanged since then, to be a regional leader in financing a fair and gradual transition to a low-carbon economy and building a sustainable future through responsible solutions[12].

The targets of the Banking Group are presented in detail in subsection 2.2 Climate change and environment – Green lending target in the OTP Group Sustainability Report.

Further purposes

In its ESG strategy for 2021, OTP Bank has set a target of achieving carbon-neutral operation by 2030. This absolute value target covers

[11] These objectives are to be understood as objectives under sub-topic Climate change mitigation and Climate change adaptation and Energy.

[12] Green finance is an objective of all three climate change sub-topic identified in the ESRS, and the OTP Bank does not address these issues separately. No base year has been identified for the target, and green exposures in the stock are measured from 2022 onwards.

Scope 1–2 emissions, and a related target of 0 tCO_2e, net zero emission is fixed, without identifying a base year. Net zero emissions is the reduction of greenhouse gas emissions where possible and the neutralisation of non-avoidable emissions through carbon dioxide removal. The target is not based on scientific evidence, OTP Bank's relevant departments were involved in its development. OTP Bank's Scope 1–2 market-based emissions in 2024 were 6,644 tCO_2e[13]. In terms of electricity, OTP Bank uses mostly green energy, with around three quarters of emissions coming from natural gas usage and vehicle fuel consumption. Preparation of the Bank's emissions intensity reduction plan for real-estate and fleet has started, and an ESG Committee decision has been taken to prepare it in 2025.

OTP Bank does not currently have targets for water, biodiversity and ecosystems, and the development of such targets will require a deeper analysis. The Bank does not currently monitor the effectiveness of its policies and actions in these areas (the Group at present only has actions in relation to water).

ESRS E1-3, E3-2, E4-3: Actions and resources

OTP Bank has identified two main packages of actions to tackle climate change: firstly, actions relating to the portfolio as specified within the frameworks of climate targeting detailed under the Environmental information @E1-4 disclosure requirement, and the **green lending** actions detailed below[14]. Of lesser importance are actions to reduce operational GHG emissions, which are presented in aggregate.

Green lending

For up-to-date information on the Green Portfolio, see section 2.1 Publications under the Taxonomy Regulation.

Green financing is ongoing. OTP Bank is integrating green/climate-conscious lending[15] into its business and aims to ensure that, over time, any customer in any sector can obtain credit on green terms, provided the customer has a green/sustainable goal that they wish to achieve with the credit. The maturity of this process varies by industry and customer segment.

The expected impact of green credits on GHG emission reductions is presented under the Environmental information @E1-4 disclosure requirement, this has not been actiond so far. The resources currently needed to implement green financing are available, and the possibility of targeted mobilisation of resources in line with market opportunities is ensured by the Sustainable Finance Framework.

Actions to help reduce Scope 1–2 emissions

Of the planned actions, green electricity procurement has had the biggest impact, OTP Bank's consumption was covered mainly by green electricity in 2024. These practices are planned to continue in 2025. Other planned actions include lighting replacement, boiler replacement, optimisation of heating and cooling, insulation and solar panel installation. OTP Bank has not yet decided on any actions on biodiversity and ecosystems. A more detailed impact assessment is needed before appropriate actions can be developed.

ESRS E1-6: GHG emissions, GHG intensity

For the calculation of GHG emissions, OTP Bank has applied the group-wide data collection and calculation methodology, which is described in detail in subsection 2.3 Reporting policy regarding chapter E in the OTP Group Sustainability Report.

[13] Comparability with previous years is not feasible due to the different reporting methodology required by the ESRS.
[14] These measures should also be understood as measures under the sub-topic Climate change mitigation and Climate change adaptation and Energy.
[15] The Group does not specifically address the sub-topic set out in the ESRS.

Emission of Scope 1, Scope 2 and Scope 3 by OTP Bank Plc. at individual level:

	Retrospective				Milestones and target years		
	Base year 2023	Comparison 2023[1]	2024	change (%)	2025	2030	annual change (%)
Scope 1 GHG emissions							
Scope 1 gross GHG emissions (tCO_2eq)	N/A	N/A	118,470	N/A	N/A	N/A	N/A
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes (%)	0	0	0	0	0	0	0
Scope 2 GHG emissions							
Scope 2 gross GHG emissions (tCO_2eq)	N/A	N/A	58,076	N/A	N/A	N/A	N/A
Scope 2 market-based GHG emissions (tCO_2eq)	N/A	N/A	48,834	N/A	N/A	N/A	N/A
Significant Scope 3 GHG emissions							
Total[2] gross indirect (Scope 3) GHG emissions (tCO_2eq)	25,007,832	25,007,832	24,835,989	(1) %	N/A	16,855,279	(5.5)%
15. Investments	25,007,832	25,007,832	24,835,989	(1) %	N/A	16,855,279	(5.5)%
Total GHG emissions							
Total GHG emissions (local basis) (tCO_2eq)	N/A	N/A	25,012,535	N/A	N/A	N/A	N/A
Total GHG emissions (market-based) (tCO_2eq)	N/A	N/A	25,003,293	N/A	N/A	N/A	N/A

[1] Note: In this year's report, the base year and the previous year are the same. The 2023 data does not include the values of the OBR Group. In 2024, biogenic emissions were 734 tons.

[2] Note: The OTP Group's total indirect gross (Scope 3) emissions do not include the financed emissions related to the assets managed by the Group's subsidiaries acting as asset managers, as these assets are not part of the Group's consolidated assets (since their owner is not the OTP Group).

OTP Bank Scope 1–2 emissions, 2024:

	OTP Bank	OTP Group without OTP Bank[1]
Scope 1 GHG emissions (tCO_2e)	5,565	112,905
Scope 2 location-based GHG emissions (tCO_2e)	8,170	49,906
Scope 2 market-based GHG emissions (tCO_2e)	1,079	47,755

[1] Note: Without the data of OTP Bank, all companies included in the consolidated group and companies under the operational control of OTP Bank.

GHG intensity based on revenue:

	Comparison	2024	2024/2023
Total GHG emissions per net revenue (local basis) (tonnes of carbon dioxide equivalent per monetary unit)	N/A	11.84	N/A
Total GHG emissions per net revenue (market-based) (tonnes of carbon dioxide equivalent per monetary unit)	N/A	11.83	N/A

The GHG intensity of OTP Bank is significantly higher than the OTP Group's GHG intesity because, while the numerator includes the total emissions of OTP Group, the denominator only includes the net revenue of OTP Bank.

Estimated Scope 3 emissions

The bulk of Scope 3 emissions by credit institutions is in category 15, that is, it is generated by loans and other investments. Therefore, the OTP Group did not estimate the emissions in categories 1 to 14 by category, but in aggregate. Estimation was based on revenue-related GHG intensity factors and own revenue data provided by the PCAF/Exiobase database[16]. OTP Bank has applied the Group's approach in determining Scope 3 emissions, which is described in subsection 2.2 Climate change – Emissions, GHG Intensity in the OTP Group Sustainability Report.

The table below shows the OTP Bank's funded emissions (Scope 3/15. Investments) broken down by PCAF asset classes and by the emission scopes of customers. OTP Bank considers its customers' Scope 1 and Scope 2 emission, excluding funding to sovereigns, as the most reliable and relevant indicator of its funded emissions. This indicator is the most informative to show the Bank's funded emissions, as in general, Scope 3 emissions and sovereign emissions are largely based on estimates and assumptions.

OTP Group's financed GHG emissions broken down by PCAF asset classes, 2023 (w/o OBR Group):

PCAF asset class	PCAF average data quality score	Total exposure	Financed Scope 1 emission	Financed Scope 2 emission	Financed Scope 3 emission	Total finance emissions
(Unit of actionment):		(million HUF)	(tons CO_2eq)	(tons CO_2eq)	(tons CO_2eq)	(tons CO_2eq)
Listed equity and corporate bonds	4.4	488,160	158,577	31,489	451,391	641,457
Business loans, unlisted equity and project loans	4.2	8,284,605	5,266,204	1,222,157	10,763,652	17,252,014
Commercial real-estate financing	5.0	570,766	44,075		N/A	44,075
Mortgages	4.1	5,134,422	651,600		N/A	651,600
Vehicle loans	4.8	1,546,814	1,809,803		N/A	1,809,803
Total without sovereign debt	**4.3**	**16,024,767**	**9,183,905**		**11,215,043**	**20,398,948**
Sovereign debt	1.4	6,033,682	2,543,807	487,273	1,577,804	4 608 884
Total (all PCAF asset classes)	**3.5**	**22,058,449**	**12,214,985**		**12,792,847**	**25,007,832**

Financed GHG intensity (financed emissions/loan volume provided) of OTP Group's portfolio in 2023, w/o OBR Group:

PCAF asset class	Financed Scope 1 intensity	Financed Scope 2 intensity	Financed Scope 3 intensity	Total emission intensity
(Unit of actionment):	(g CO_2eq/HUF)	(g CO_2eq/HUF)	(g CO_2eq/HUF)	(g CO_2eq/HUF)
Listed equity and corporate bonds	0.32	0.06	0.92	1.31
Business loans, unlisted equity and project loans	0.64	0.15	1.30	2.08
Commercial real-estate financing	0.08		N/A	0.08
Mortgages	0.13		N/A	0.13
Vehicle loans	1.17		N/A	1.17
Total without sovereign debt	**0.57**		**0.70**	**1.27**
Sovereign debt	0.42	0.08	0.26	0,76
Total (all PCAF asset classes)	**0.55**		**0.58**	**1.13**

[16] The PCAF/Exiobase database is a database issued by the PCAF containing proxies for various corporate emissions for PCAF signatories.

In terms of financed GHG intensity (financed emissions/outstanding loans), which forms the basis of the OTP Group's climate targeting, the only informative indicator is the Bank's financed Scope 1 and 2 GHG intensity, excluding the sovereign portfolio.

OTP Group's financed GHG emissions broken down by PCAF asset classes, 2024:

PCAF asset class	PCAF average data quality score	Total exposure	Financed Scope 1 emission	Financed Scope 2 emission	Financed Scope 3 emission	Total finance emissions
(Unit of actionment):	(1–5)	(million HUF)	(tons CO_2eq)	(tons CO_2eq)	(tons CO_2eq)	(tons CO_2eq)
Listed equity and corporate bonds	4.4	549,420	169,045	32,618	472,556	674,219
Business loans, unlisted equity and project loans	4.1	8,558,410	4,339,808	1,095,399	10,094,675	15,529,883
Commercial real-estate financing	4.8	706,425	47,570		N/A	47,570
Mortgages	4.1	6,035,650	586,892		N/A	586,892
Vehicle loans	4.6	1,980,147	2,025,430		N/A	2,025,430
Total without sovereign debt	**4.2**	**17,830,052**	**8,296,763**		**10,567,231**	**18,863,994**
Sovereign debt	1.4	8,871,078	3,312,631	623,254	2,036,110	5,971,995
Total (all PCAF asset classes)	**3.3**	**26,701,130**	**12,232,648**		**12,603,341**	**24,835,989**

ESRS E1-7, E1-8: Carbon credits, GHG removals and internal carbon pricing

OTP Bank has purchased 7,000 tCO_2e of carbon credits in 2024. This volume covers the entire Scope 1–2 emissions of OTP Bank. Carbon credits retired during the reporting period are verified according to the Verified Carbon Standard by Verra. The Bank considers it essential that the project supported by the counterpart is located in the country of operation of the Banking Group, and therefore the only project supported by the purchase is the Sant Nikola Wind Farm near the town of Kavarna in Bulgaria, which is the largest wind farm in the country. The project is a mitigation project and does not qualify as an appropriate adaptation under Article 6 of the Paris Agreement[17].

OTP Bank's carbon neutrality target includes the use of carbon credits as well. The use of carbon credits does not prevent the achievement of the Scope 1–2 2030 target of zero emissions, given that OTP Bank has started to develop emission reduction plans based on energy efficiency and renewable energy use. In addition, the Bank plans to redeem carbon credits purchased in line with its existing practice as compensation for its own operational carbon footprint with a "habitat restoration certificate".

Together with the Pilisi Parkerdő Ltd. as a cooperating partner, we aim at the development of a 400 ha nature conservation area, the so-called Budakeszi Wildlife Garden, with a complex urban forest approach, which somewhat puts the economic aspects of the classic triple function of forests, i.e. economic-nature conservation-welfare, into the background in order to preserve and enrich the natural-ecological values of forests and to develop the forest area in line with its natural values in the field of ecotourism. The Bank's target with the project is multiple: on the one hand, it offers a platform for building professional engaging and scientific work on biodiversity, climate adaptation, carbon sequestration and ecosystem services, and on the other hand, it can promote sustainability among our employees by integrating the use of forest land into a non-financial recognition scheme, and it can also shape the Bank's image.

The company does not apply internal carbon pricing.

ESRS E4-1: Transition plan and biodiversity in the strategy and business model, significant negative impacts

The disclosure requirement is presented as part of the information in the @Materiality assessment ESRS 2 SBM3.

[17] The project is 100% reduction project, 100% implemented in the European Union, 100% certified to recognised quality standards.

2.3 ESG risk management

OTP Bank pays particular attention to managing ESG risks and implementing climate change considerations into business practices.
The Bank's risk management and business area pays particular attention to integrating the different risks associated with green lending. The Bank's ESG risk assessment and management process is the basis of the group-wide practice, so its detailed presentation, as regulatory and organisational operational foundations, together with the identified risks (credit, operational, market, liquidity) and the actions to manage them are presented in detail in the OTP Group Sustainability Report, in chapter 2.4 ESG Risk Management.

Reporting policy in connection with Chapter E

The Bank has also developed a group-level reporting practice for individual-level disclosures (see subsection IRO-2), so the definitions, calculation methodologies and data requirements for environmental information follow the guidelines set out in subsection 2.3 Reporting policy regarding chapter E in the OTP Group Sustainability Report, extending to OTP Bank.

3. Social information

3.1 Own workforce

ESRS S1 SBM-3: Material impacts, risks and opportunities

Among the topics identified by the ESRS, the following are material for OTP Bank: (1) gender equality and equal pay for work of equal value, (2) diversity, (3) employment and inclusion of people with disabilities, (4) training and skills development, (5) health and safety, (6) work-life balance and (7) measures against violence and harassment in the workplace. The treatment of these topics is presented in this section, with the first three treated together.
The own workforce is the total of employees and non-employee agency workers, as well as self-employed individuals who have contracted with OTP Bank as individuals to perform specific work (hereinafter non-employee workers are presented at the external employees group level, the Bank has made use of the possibility to phase them in its individual reporting). With respect to the Bank's own workforce, the material impacts identified in the dual materiality analysis are known and intended to cover all persons in the Bank's own workforce who may be materially affected by the Bank.
The vast majority of own workforce, 10.820 people, are employees, working on full or part-time contracts. The Bank's practices focus on employees within its own workforce.
The material or potentially material impacts affect most employees, no such material impacts have been identified that are specific to certain regions, thus, the same impacts apply to OTP Bank, which have been defined at group level.
The operations of the Bank do not involve significant negative human rights aspects, such as the risk of child labor, forced labor, or compulsory labor. Additionally, there are no negative impacts on the workforce resulting from the implementation of transition plans aimed at reducing negative environmental impacts. The material impacts identified for OTP Bank's own workforce can be both positive and negative, depending on the Bank's practices. The Bank strives to achieve positive impacts while mitigating or avoiding negative impacts.
Identifiable negative impacts[18], such as health and safety risks and workplace violence and harassment risks, primarily occur in individual cases, while stress risk affects a broader range of employees.
We aim to achieve positive impacts in work-life balance, gender equality and equal pay for work of equal value, training and skills development, and the employment and diversity of people with disabilities. Activities aimed at achieving positive impacts do not differ based on employees' contractual relationships, although most actions have a well-identified

[18] In the materiality assasment, we identified that most impacts can be both positive and negative. The negative impact mentioned above should be understood as focusing on avoiding negative impacts in these topics, while the goal for other topics is to achieve positive impacts.

target group (e.g., women, people with disabilities). Positive impacts vary by country, depending on which area or activity a particular group member places greater emphasis on. To protect vulnerable groups (gender, ethnicity, religion, age, disability, family status), a group-level policy (Code of Ethics) is in place, which includes the prohibition of discrimination and actions against violence and harassment in the workplace, applicable to the entire workforce. Regarding the impacts on its own workforce, the job position is fundamentally the determining factor, not the form of employment. For temporary workers, the working conditions are, in many respects, the same as for the permanent. OTP Bank members identify and manage health and safety impacts differently, in compliance with local regulatory requirements. Most companies conduct regular risk assessments to ensure a safe working environment.

ESRS S1-1: Policies related to own workforce

OTP Bank's overall policy for its own workforce is the Code of Ethics of OTP Bank Plc. and OTP Group, which expects respect for human rights, emphasises the principles of equal treatment, job security, prevention of harassment and fair employment. A detailed description of the Code of Ethics (its content and scope) can be found in subsection 4.1 Corporate Governance – Policies on Corporate Culture and Business Conduct in the OTP Group Sustainability Report. Policies outside the Code of Ethics are described in the following subsections.

ESRS S1-2: Processes of engaging with own workforce

Engaging with own workforce and employee representatives takes several forms. This engaging also includes interest representatives, the opportunities for which are provided by OTP Bank in accordance with the relevant Hungarian legislation.

Employee engagement survey

As a member of the OTP Group, the Bank is also part of the annual engagement survey, to which all employees of the member companies participating in the survey are invited. At OTP Bank it has achieved a response rate of more than 80%. OTP Bank conducted the annual engagement survey according to the methodology described in the OTP Group Sustainability Report subsection 3.1 Own workforce – Processes for engaging with own workforce.

Consultation

The Managing Director of the Human and Organisational Development Directorate of OTP Bank holds regular formal and informal consultations with the President of the OTP Bank Employees' Trade Union to jointly discuss labour law, remuneration, work organisation and human capital development issues affecting central and branch workforce. OTP Bank has not concluded a global framework agreement with employee representatives on respect for the human rights of its own workforce.

ESRS S1-3, S1-17: Channels for raising concerns, complaints

OTP Bank uses a variety of mechanisms to provide complaint-handling facilities for both employees and external employees. These mechanisms include anonymous options, and complaint handling also addresses the need for employees to use these channels with confidence. The Ethics Reporting system is available to all our own workforce (see Governace Information).

Trade unions, as well as labour representatives, also have an important role to play in raising employees' concerns and remedying any negative impacts (@Own workforce S1-2).

In addition to the internal channels provided by the Bank, employees also have the legal means to directly initiate proceedings before the courts, therefore we consider this to be a suitable channel for raising concerns.

The occupational safety authority and labor inspection institutions can also function as complaint mechanisms; however, their primary role is regulatory, so we list their procedures in the Governance chapter in relation to legal compliance (GRI 2-27).

Employee complaints are handled in accordance with the procedures and deadlines set out in the law and in the ethics and internal labour regulation documents. Employees can submit a complaint about the protection of their rights under the Code of Ethics, the internal labour regulations and the collective agreement, which are accessible and available to all employees.
Nearly 16% of OTP Bank's ethics complaints, identified as 32[19], were received from its own employees. In neither case was any financial compensation paid. Within OTP Bank, there have been no reports of discrimination or cases of justified discrimination against its own employees. No complaints of discrimination against OTP Bank's own employees have been received by the national contact points, which follow the OECD guidelines for multinational companies. No internal occupational safety or union complaints were received in the reporting year. In 2024, no labor court proceedings were initiated or concluded against OTP Bank.

ESRS S1-5: Targets

The engagement survey is the primary tool OTP Bank uses to comprehensively action, assess and monitor progress in all areas related to its employees, including the material issues identified in the double materiality assessment In relation to employees, increasing the level of employee engagement is an target of OTP Bank. OTP Bank, as the parent bank, is the initiator of the Group's target, which is presented in detail in the OTP Group Sustainability Report chapter 3.1 Own workforce, subsection Targets.

ESRS S1-4: Actions to address significant impacts on own workforce

For OTP Bank, the employee engagement survey (Gender equality and diversity) serves as a basis for annual action planning, process improvement, and realising further actions and programmes. The focus for improvement – even with the improving values – remained unchanged in 2024 **on providing career opportunities,** improving and streamlining processes for **employee well-being** and **senior management engagement** in employee dialogue.
The material actions are presented by topic in the following subsections (@Gender equality and diversity, @Training and skills development, @Occupational health and safety, @Work-life balance, @Workplace violence and harassment In its policies, targets and practices, as set out in its Code of Ethics, OTP Group places emphasis on not causing or contributing to material adverse impacts (see Materiality assessment S1 SBM-3).
OTP Bank also occasionally uses external audits and controls to ensure internal operational processes (see health and safety).

The Bank's HR area manages the impact on employees, the legal and compliance area supports the handling of complaints, the investigation of ethics complaints, the assurance of legal compliance, and the compliance area is responsible for actions against workplace violence and harassment. OTP Bank aims to employ sufficient internal human resources with experience and expertise in these areas, and it uses external expertise where necessary. Indirectly, the provision of adequate resources is characterised by the results of the employee engagement survey, the employee complaints and legal compliance; there is an improvement in engagement, the number of employee complaints is not considered high in relation to the number of employees.
Workplace engagement at OTP Bank and its participating domestic companies[20] – increased significantly, by 4 percentage points in 2024 (from 76% to 80%), exceeding the financial sector benchmark. There has been a positive shift in all engagement issues (so-called drivers)[21].

ESRS S1-6: Characteristics of employees

At the end of 2024, OTP Bank employed 10,820 people, an approximate 1% increase compared to a year ago.

[19] The identity of the reporter shall not be accurate due to the possibility of anonymity.
[20] One of the key indicators of OTP's engagement model is the engagement score. This is an output score that cannot be directly improved.
[21] The other elements of the survey are drivers: specific experiences (e.g. community building, empowerment, recognition etc.) through which an organisation can positively or negatively influence engagement. The key elements of the engagement survey are statements with which agreement is measured on a 5-point scale. Engagement is a composite indicator that reflects the average of the proportion of positive responses given to the statements it contains.

OTP Bank Employee headcount data:

(persons, as at 31 December)	2023			2024		
	Total	Men	Women	Total	Men	Women
Total employees	**10,715**	**3,978**	**6,737**	**10,820**	**4,180**	**6,640**
Full time employees	9,841	3,904	5,937	10,009	4,100	5,909
Part-time employees	874	74	800	811	80	731
Available	N/A	N/A	N/A	0	0	0
Permanent employees (permanent contract employees)	10,433	3,917	6,516	10,542	4,097	6,445
Temporary employees (fixed-term contract employees)	282	61	221	278	83	195

The turnover of OTP Bank was as follows:

Employees who left	2024
Employee turnover rate (%)	**13.34**
Employees who left (person)	1,443
male	489
female	954
under 30 years	364
between 30–50 years	770
over 50 years	309

3.1.1 Gender equality and diversity

Own Workforce: Diversity – Impacts, Risks and Opportunities

Due to its significant number of employees, the Bank has both the opportunity and the role to implement diversity. (This topic partially overlaps with @Gender equality and diversity- and the employment of people with disabilities.)

Managing diversity as a material topicat OTP Bank

OTP Bank's diversity @strategy expresses its commitment to the diversity of board and management members. The Bank operates diversity programs and publishes training materials that support diversity and shape attitudes. According to the employee engagement survey, 84% of employees at the group level experience that professional success at the company is independent of gender, age, cultural background, ethnicity, and religion.

Own Workforce: Employment and Inclusion of People with Disabilities – Impacts, Risks and Opportunities

Due to its size and scope of activities (as a wide range of society interacts with its employees), the Bank could have a material impact on the employment of people with disabilities and the change of this employment culture. Currently, the employment of these individuals is low.

Managing the employment and inclusion of persons with disabilities as a material topic at OTP Bank

The Bank prohibits all forms of discrimination, and actions supporting the employment of people with disabilities are not widely implemented.

Own Workforce: Gender Equality – Impacts, Risks and Opportunities

This topic strongly influences employee well-being, which is also made important by the high proportion of female employees. The Bank monitors the pay ratio of men and women in the same positions, which only slightly differs. The proportion of female leaders at higher levels is consistently lower.

Managing gender equality as a material topic at OTP Bank

In line with legal requirements and its commitment to equal opportunities, OTP Bank consistently enforces the principle of "equal pay for equal work." The Bank applies a gender-neutral remuneration policy. The Bank's strategy for achieving gender equality includes a commitment to increasing the proportion of women in leadership bodies. Leadership training and internal awareness campaigns are implemented to strengthen an inclusive approach.

ESRS S1-1: Policy

The **Code of Ethics** includes the equal opportunities and diversity guidelines (III. 15. Equal treatment, equal opportunities, non-discrimination and III. 16. Fair Employment Practices), in line with international guidelines and local legislation. The relevant guidelines and policies are set out in the Code. In addition to the Code of Ethics, the following policy governs diversity.

A strategy for creating gender equality

Key content: In 2021, OTP Bank Plc. created a gender equality strategy in order to promote the equal inclusion of women as a group at risk of vulnerability. The Bank has set as a strategic goal to ensure equal opportunities for all groups of employees, to create an open and inclusive workplace free from discrimination, and to promote a diverse, professionally outstanding, collaborative work culture.
Scope: The strategy applies to OTP Bank.
Accountable for implementation: The Chief Compliance Officer, who is directly responsible to the Chairman & CEO, is responsible for ethics issues and reports to the Ethics Committee.
Ensuring accessibility: The strategy is also publicly available on the Bank's @website, and is available online to stakeholders on an internal platform.
Reference to third-party standards:
The strategy complies with the relevant Hungarian legal requirements (Hpt.), and the work of the Nomination Committee follows the recommendation of the Hungarian National Bank and the EBA-GL-2017-12 guidelines of the European Banking Authority. The handling of complaints of discrimination is included in the @S1-3 Gender equality and diversity disclosure.
OTP Bank regularly analyses key indicators of talent attraction and opportunities for employee development, with a particular focus on building a group-wide leadership community and building international professional knowledge and community through the development of key competencies.

ESRS S1-4: Actions: gender equality and diversity

In accordance with the principles of the Code of Ethics, OTP Bank's internal regulations stipulate that jobs must be filled and performed according to specific criteria relating to the type and level of qualifications, work experience and other criteria, in accordance with the complexity, responsibilities and specific job description, without any discrimination.
OTP Bank continuously applies actions to promote equality and diversity, which are typically monitored, however, criteria for effectiveness are not always set. Some of these programmes are presented here, without claiming to be exhaustive:
In 2024, the Bank launched new diversity programmes:

- With the launch of women's leadership development programmes and the international Women Network, it prepares and encourages women for more senior leadership roles.
  A series of webinars and a mentoring programme for women leaders help the

most talented women leaders develop their careers.
- The Bank is strengthening the employment of women in the digital and IT fields by launching a dedicated trainee programme, the OTP Digital GirlPower Programme.
- Diversity awareness training materials are produced for managers and employees to help overcome unconscious bias, on gender equality and diversity. The development of a digital curriculum on "Openness and Inclusion" for the whole workforce also serves as a basis for future inclusive leadership development programmes.

ESRS S1-5: Goals related to gender equality and diversity

A measurable target has been set by OTP Bank in 2021 (without a timeframe) in its Strategy for Gender Equality.

There should be at least one female member on the Board of Directors and the Supervisory Board. The Bank also takes into account the legal requirement that members of the Management Board should have the appropriate knowledge, skills and experience, which remains a primary and essential condition for the selection of suitable candidates.
In setting this target, the Bank has taken into account the relevant Hungarian and European Union recommendations[22]. Since 2021, the Board of Directors has one female member.
In order to ensure that the company's management succession includes a sufficient number of female candidates to be appointed from within, OTP's group-wide management succession planning recommended already in 2024 that at least 30% of the candidates should be women.

Diversity indicators:

Gender distribution of senior management, OTP Bank 31.12.2024.	Men	Women
Number of senior managers (person)	6	0
Proportion of top managers	100%	-

Age distribution of employees 31.12.2024.	OTP Bank
Under 30 years	1,645
Between 30-49 years	6,438
Over 50 years	2,737
Total	**10,820**

OTP Bank employed 40 employees living with disabilities at the end of 2024.

ESRS S1-16: Remuneration indicators (pay gap and total remuneration)

The difference between the average wage level of female and male employees in the OTP Group, expressed as a percentage of the average wage level of male employees, is 39.15%. The difference is due to the fact that men and women tend to hold different jobs, with more men working in higher (paid) positions.
The ratio of the total annual remuneration of the highest-paid individual at OTP Bank to the median of the total annual remuneration of all employees (excluding the highest-paid individual) is approximately 60% of the group-level indicator, which is justified by the group's geographical diversity and the central, parent company nature of the Bank.

3.1.2 Training and skills development

Own Workforce: Training and skills development – Impacts, Risks and Opportunities

Due to its significant role as an employer, OTP Bank's training and skills development practices influence the sector and other

[22] Including Recommendation No 11/2019 (V. 6.) of the Hungarian National Bank and Guideline No EBA-GL2017-12 of the European Banking Authority

employers. Employees in the financial sector are generally more educated than the average population. Access to training is always ensured.

Managing training and skills development as a material topic at OTP Bank

OTP Bank provides a wide training portfolio for its employees. Professional and personal development training necessary for work, as well as other (e.g. mandatory) training, are typically implemented according to annual training plans. These plans are developed with the involvement of employees, taking into account the results of performance evaluations.

Training and skills development policies, targets and actions extend to OTP Bank and are presented at group level in the OTP Group Sustainability Report, subsection 3.1 Own workforce – 3.1.2 Training and skills development. The Bank makes use of the possibility of a gradual introduction regarding specific indicators.

3.1.3 Occupational health and safety

Own workforce: Health and Safety – Impacts, Risks and Opportunities

For a significant portion of employees, stress emerges as a relevant risk, considering that the majority of employees do not work in hazardous working environment.

Managing health and safety as a material topic at OTP Bank

The Bank supports employees in stress management in various ways. We provide health services (health insurance and extensive screening tests) that exceed legal requirements. According to employee feedback from the engagement survey, OTP Bank adequately manages occupational safety.

ESRS S1-1: Policy

The policy on occupational health and safety is the Bank's Occupational Health and Safety Regulation, which is drawn up in accordance with local legislation to ensure compliance with the law.

Key content: OTP Bank's Occupational Health and Safety Regulation is a comprehensive occupational safety and health prevention strategy, which is designed to achieve the requirements of safe and healthy working in accordance with the Act on Occupational Safety and Health. The regulation defines the persons responsible for the performance of safety and health tasks in a uniform manner throughout the workplace, and regulates the processes for the performance of individual safety and health tasks. Subsidiary-level policies also focus on creating and implementing safe working conditions.

Accountable for implementation: OTP Bank's policy was approved by the CEO, and the person responsible for occupational safety activities at the Bank is the Head of the President-CEO's Cabinet. At the group members, the CEOs are responsible for approving the policy, and they are supported in its implementation by the heads of the operational areas and the local occupational safety officers..

Ensuring accessibility: OHS regulations are available in the internal regulatory repositories.

Reference to third-party standards:

The framework for occupational health and safety is provided by local legislation.

In 2023, OTP Bank's Occupational Health and Safety Regulation was revised in line with the changes in the legislation amending the Act on Occupational Safety and Health, mainly with regard to occupational safety and health training and medical fitness tests, before the entry into force in 2024.

The Bank has an internal regulatory system for occupational safety and health, which is based on the legislation and guidelines in force.

ESRS S1-4: Actions: health and safety at work

OTP Bank is committed to maintaining a safe and healthy working environment and as part of this, it operates occupational health and safety programmes. These programmes include targeted actions to prevent accidents,

minimise risks at work and protect workers' physical and mental health. OTP Bank's employees work mainly in low-risk jobs as regards health and safety, the framework of occupational safety is regulated in accordance with the legal requirements, and occupational health and safety activities are also carried out in accordance with these requirements. Actions taken to prevent and mitigate risks to health and safety at work aim to reduce accidents and occupational diseases at work, in line with the Bank's target of providing a safe and healthy working environment.
OTP Bank also investigates the near miss incidents, and presents the lessons learned and good practices to the affected employees in the context of special training.
The Bank's employees receive regular **training on occupational safety and health in** accordance with the legal requirements, including occupational safety, fire safety and electrical safety. The internal regulations and training materials related to the subject have been prepared, their content is familiarised and documented both on entry and throughout the employment, and trainings are documented in the minutes. The referenced regulations and educational materials are continuously available on internal communication platforms. The completion of training courses is monitored and followed up. Separate training sessions are held when there are changes to the renovation of a site.

Health promotion, health maintenance

It is common practice within the Group to hold regular preventive **health checks** for employees. OTP Bank provides an occupational health check for all jobs, even though this is not a legal requirement. Preliminary and periodic medical tests are carried out according to a schedule set by the health authorities. Within the **occupational health** framework of OTP Bank, 9,540 inspections were carried out by the end of September. The tests are adapted to the specificities of the job. Employees in office and customer areas have also undergone basic tests, while employees in higher risk jobs have also undergone specific tests.
The Bank **provides** a high quality **health insurance service** for employees. As a result of the service, 5,908 employees have undergone tests, including 4,087 screenings and 20,278 complaint handlings.
The Bank pays attention to **health promotion,** making welfare programmes available to all employees. These typically consist of various lectures, webinars, workshops, health days, and screening tests. The programmes are varied, focusing on health promotion, mental and physical health and stress management.

Stress management

To promote mental wellbeing, OTP Bank conducted a renewed psychosocial risk survey in 2024, which anonymously covered the topics of health, stress and workload. 12% of employees took part in the survey and the results were used as a basis for further health programmes.
OTP Bank runs a programme of supportive conversations to help employees manage stress at work by providing them with the support of a mental-health professional, psychologist or coach in difficult, mentally stressful situations. The service is available free of charge to all employees. The service is provided by an external partner (otp.meghallgatunk.online). The supportive conversations are conducted along the ICF (International Coach Federation) guidelines and mental health framework, and are confidential. The service is being used by more and more workers every year, with more than 1.398 interviews having taken place by the end of 2024.
Employee skills training (e.g. mindfulness, stress management, effective and assertive communication etc.) is available twice a year for Bank employees. The training is organised on a demand-driven basis, with an average of 350 employees taking part every six months.
The effectiveness of actions and initiatives is monitored and evaluated by the Bank through various processes. Health and safety compliance is supported by internal audits, and feedback from stakeholders, particularly employees, is used to evaluate initiatives.

ESRS S1-5: Health and safety at work targets

The Bank has not set a specific target related to health and safety at work.

ESRS S1-14: Health and safety indicators
The percentage of persons covered by the company's health and safety management system, based on legal requirements and/or recognised standards or guidelines, is 100% within the company's own workforce.

Accidents and illnesses at work, 31.12.2024:

OTP Bank	2024
Number of accidents (nr)	
employees	8
Accident rate (per 1 million working hours*)	
employees	0.44
Occupational illness (nr)	
employees	0
Total number of calendar days lost due to accidents at work and illness among employees (nr)	**80**
Number of fatal accidents and illnesses (nr)	
employees	0

* Working hours are mainly the number of hours actually worked, based on the timesheet.

3.1.4 Work-life balance

Own Workforce: Work-life balance – Impacts, Risks and Opportunities

The Bank influences work-life balance through overtime, flexible employment opportunities, and access to childcare options. The family-related commitments of female employees are typically stronger in society, making these impacts more significant given that about two-thirds of the Bank's employees are women.

Managing work-life balance as a material topic at OTP Bank
As part of its annual employee engagement survey, the Bank Group also explores and monitors employee opinions on work-life balance. The level of overtime at the Bank generally does not endanger work-life balance. The achievement of work-life balance is supported by the availability of flexible employment opportunities and access to childcare options, with approximately 8% of employees working part-time.
The work-life balance actions extend to the OTP Bank and are presented at group level in subsection 3.1.4 Own workforce – Work-life balance in the OTP Group Sustainability Report, with the Bank making use of the possibility of a gradual introduction of specific indicators.

3.1.5 Workplace violence and harassment

Own Workforce: Measures against violence and harassment in the workplace – Impacts, Risks and Opportunities

The large number of employees and the high proportion of female employees make this topic important, which is further intensified by the lower proportion of female employees at higher levels (increasing the risk of abuse). No confirmed abuse has occured.

Managing material topic of measures against violence and harassment in the workplace at OTP Bank
The Banking Group's practice aims to ensure compliance.
The policies and actions against workplace violence and harassment extend to OTP Bank and are presented at group level in subsection 3.1 Own workforce – Measures Against Workplace Violence and Harassment in the OTP Group Sustainability Report.

ESRS S1-17: Incidents, complaints and serious human rights impacts
As for OTP Bank, no justified case of discrimination against its own employees was confirmed in 2024.

Reporting policy in connection with chapter S1

The Bank has also developed the group-level reporting practice for individual-level disclosures (see subchapter IRO-2), so the definitions, calculation methodologies and data requirements for own workforce follow the guidelines set out in subchapter 3.2 Reporting policy regarding Chapter S1 in the OTP Group Sustainability Report, extending to OTP Bank.

3.2 Customers

ESRS S4 SBM-3: Material impacts, risks

The section details the treatment of the material topics: (1) information security and privacy, (2) quality information and (3) access to financial products and services, for which the impacts and the most affected customer groups are detailed in subchapter 3.3 Clients – Material Impacts, Risks in the OTP Group Sustainability Report.

ESRS S4-2: Customer engaging processes

OTP Bank regularly collects customer feedback and actions customer satisfaction to improve customer experience. Retail customer satisfaction is actiond using the TRI*M methodology–complemented by the NPS[23] and the SQM[24] methodologies for some of our member companies. Through the TRI*M, we action the overall satisfaction, loyalty and the main factors of satisfaction of the Bank's customers, as well as those of all relevant competitors. Information is also analysed by customer segment (e.g. career starters, juniors, premium customers). We carry out a national survey every year on a representative sample of 1,000 people[25].
Complaint handling is also one of the means of engaging with customers (see @Customers).
The Bank does not regularly cooperate with consumer organisations or consumer representatives.

Customer-focused product development

To support customer-focused product, process and service design, OTP Bank established a group-wide framework in 2024, which is described in the OTP Group Sustainability Report, subsection 3.3 Clients – Processes for engaging with consumers and end-users about impact.

ESRS S4-3: Channels for raising concerns

The Bank offers its customers a wide range of complaint procedures. Complaint-handling procedures are regulated, complaint handling is in line with internationally recognised human rights and is non-discriminatory.
The Bank responds to complaints in accordance with the legal framework. The Bank seeks to engage in dialogue with complainants in order to reach a prompt solution. In the case of legitimate complaints, OTP Bank aims to restore the original situation or to restore the appropriate situation and, taking into account fairness aspects, to apply compensation in individual cases.

Channels for customers to report complaints

Customers can make reports in the ethics reporting system (see @Governace Information) and through the complaint reporting channels (website, call centre, in person at branches, postal mail). Customer access is not restricted in any of the channels and enquiries from other channels (such as social media) are also forwarded to the complaints area.
In the case of OTP Bank, in addition to the channels listed above, customers can also submit complaints to the Hungarian National Bank.
OTP Bank informs customers about the channels for complaints and reporting, and the procedure for investigating complaints on the website, in publications, in written communication with customers, in the policies provided in bank branches and in social media. The channels are clearly usable by generally

[23] Net Promoter Score – an indicator of customer satisfaction.
[24] Service Quality Management, examining the quality of customer service in retail and SME branches.
[25] Based on breakdown by age, sex, education, municipality type, region.

prepared customers. The degree of trust in the channels is not examined separately, but the fact that complaints are received by the channels implies that customers have trust in the company and the channels.
OTP Bank manages and stores the content of the notifications and the related data confidentially and in accordance with the applicable legislation and its Code of Ethics (see @Governace Information).

Ensuring the effectiveness of complaint handling, following up problems

The tracking of complaints raised and handled is realised in the dedicated complaint handling system of OTP Bank. Complaints are given a unique identifier so they can be easily tracked in the systems. Each case has a clearly designated responsible employee or team to review and resolve the case. Customers are informed about the complaint-handling process and any action to be taken.
Monthly, quarterly and annual reports are produced on the number of complaints received, their status and resolution times. These reports help to monitor the effectiveness of the process and identify areas for improvement. By analysing the aggregated data, we identify recurring problems that indicate potential systemic weaknesses and allow corrective action to be taken. We track the frequency of the use of each channel. Traffic analysis provides insights into which channels customers prefer and also helps to identify channel problems. We assess response times: delays may indicate weaknesses that need to be addressed.
In the case of errors involving several customers or major losses, the complaint-handling department cooperates with the relevant department and the errors are followed up.

Improving complaint handling

OTP Bank pays special attention to the continuous improvement of its services, based on the information and experience gained from complaint investigations.
In 2024, OTP Bank started developing a new complaint-handling platform. The new structure will allow for the automation and process control of various complaint-handling processes. Among other things, the aim is to facilitate processing times and reportability.

Number of customer complaints:

	2024
Number of complaints closed	~178,000
Number of legitimate complaints	~101,000

In addition to complaints, in 2024, OTP Bank received a total of 200 ethics reports through the ethics reporting system.

No serious human rights incidents related to customers were confirmed in OTP Bank in 2024. OTP Bank does not currently expect its business partners to have channels for submitting complaints. The Bank shall make its proposal to terminate a business relationship with a customer taking into account all the facts and circumstances relating to the customer and the customer relationship that are available and usable by the Bank, including the actual or potential negative effects that the proposal to terminate or maintain the customer relationship with that customer may have on other customers.

3.2.1 Information security and data protection

Clients – Information security and data protection – Impacts, Risks and Opportunities

This topic includes not only the protection of personal data but also the areas of information security and cyber defense, as these are interconnected topics within the Bank Group. However, the ESRS does not specifically name the latter. The Bank holds a large amount of sensitive data about its customers.
The protection of personal data, as well as the improper handling or breach of information security and cyber defense, can undermine customers' sense of security and cause harm to them. Breaches of personal data protection, misuse, or violations of legal expectations, as well as successful attacks and incidents in the field of information security and cyber security, can cause significant losses to both OTP Bank and its customers.

Data protection deficiencies, violations, and potential incidents not only carry the risk of significant financial penalties but can also lead to customer complaints and loss of customers. Consequently, the reputation of banks would decrease.

Managing information security and data protection as a material topic at OTP Bank

OTP Bank prioritizes security and safe operations. The fundamental principles and main directions related to security are defined by the Security Policy, while the handling and protection of personal data are carried out according to the principles of the Compliance Policy. Security systems and workflows are continuously evolving, and employee training is regular. The Bank aims to apply the most advanced solutions for data management, data security, and preventing data leakage.

The integration of the data protection and consumer protection departments ensures that data protection and consumer protection aspects are more emphasized during product introductions and process development than before.
The Bank manages risks within the framework of operational risks. Risk assessments are conducted as part of the Annual Group-Level Risk and Control Self-Assessment and scenario analysis, based on which actions to mitigate risks are determined.

ESRS S4-1: Policies

OTP Bank has an anti-fraud, security and data protection policy in relation to information security and data protection, which is the same as the policy for the OTP Group.
The **anti-fraud policy** includes an assessment of current practices in fraud prevention and management, identification of expected future fraud trends, the financial organisation's exposure to fraud, responses to trends, and the definition of related goals and targets.

The purpose of the Bank's **Security Policy** is to summarise the Bank's security principles, taking into account international and national legislation, recommendations, expectations and guidelines, and to set out the main lines of security activity which together define, promote and support the proper, legal, safe and prudent operation of the Bank.

The Data Protection Policy is part of OTP Bank Plc.'s Compliance Policy (see G1-1), which states that the Bank respects fundamental rights and ensures full compliance with the principles of data protection at all times when processing personal data and transmitting them to third parties.
A detailed description of the policies can be found in subsection 3.3.1 Information security and data protection – Policies in the OTP Group Sustainability Report.
OTP Bank's customer policies are in line with the EU's relevant consumer protection-

related regulations, which have also been implemented in Hungarian law.[26]
2024, there has been no significant change in policies. The supervisory recommendations have been incorporated into the procedures, but have not resulted in any material changes.

ESRS S4-4: Actions

Information security, fraud management

It is part of the activities of the Executive Steering Committee (ESC), the coordination and operational decision-making forum of the Bank's management, to discuss fraud-related issues, so coordination with the business areas is carried out at the highest level.

The Bank's Security Directorate has implemented significant **organisational changes** in 2024, including reallocation of human resources and increasing the number of workforce to reduce fraud against customers, to ensure that fraudulent losses can be reported as soon as possible and to recover stolen funds. Units have been set up with a dedicated task to combat fraud and to carry out certain sub-activities related to this (e.g. Investigation Unit, Fraud Management Support Unit, Anti-Fraud Competence Centre).

The actions implemented by OTP Bank to manage information security and data protection are described in detail in the subsection Actions of section 3.3.1 Information security and data protection in the OTP Group Sustainability Report, which include the operation of the Bank's Cyber Security Centre, the investigation of customer damage, customer education and related campaigns, the developments that have taken place, and the way of engaging with regulatory and professional bodies.

GRI 418-1: In 2024, there were no incidents of misuse of personal data at OTP Bank.

Data protection

The Bank's data management processes are designed to comply with data protection legislation, are purpose-driven and based on the principle of necessity. In all cases, customers are provided with information on the data management processes relating to personal data concerning the customer. The adequacy of data protection processes is checked using compliance control tools. The processes for ensuring data protection policies, handling customer notifications and investigating complaints are described in detail in the subsection Actions of section 3.3.1 Information security and data protection in the OTP Group Sustainability Report.

ESRS S4-5: Targets

The targets related to information security and data protection, partly directly and partly indirectly, are set out in the Anti-Fraud Strategy, which is presented in detail in subsection

[26] a) Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Commercial Advertising (Act XLVIII of 2008); *Directive 2005/29/EC amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council;*
b) Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices(Act on Unfair Competition); *Articles 85 and 86 of the Treaty of Rome (EEC Treaty); Council Regulation 19/65/EEC on the application of Article 85(3) of the Treaty to certain categories of agreements and concerted practices;*
c) Act XLVII of 2008 on the Prohibition of Unfair Commercial Practices against Consumers (Unfair Commercial Practices Act); *DIRECTIVE 2005/29/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council (Unfair Commercial Practices Directive);*
d) Act CVIII of 2001 on Electronic Commerce and on Information Society Services (E-commerce Act); *DIRECTIVE 2000/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market (Directive on electronic commerce);*
e) Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Hpt.); *DIRECTIVE 2013/36/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC; REGULATION (EU) No 575/2013/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012;*
f) Act CLXII of 2009 on Consumer Credit (Fhtv.); *DIRECTIVE 2008/48/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC;*
g) Government Decree No 83/2010 (III. 25.) on the determination, calculation and publication of the annual percentage rate of charge (THM Decree);
h) Government Decree No 82/2010 (III. 25.) on calculating and announcing deposit interest rates and securities' yields (EBKM Decree);
i) Government Decree 144/2018 (VIII.13.) on certain issues related to the information on fees for payment connected to payment accounts held for consumers (PAD Decree); *Directive 2014/92/EU of the European Parliament and of the Council of 23 July 2014 on the comparability of fees related to payment accounts, payment account switching and access to payment accounts with basic features.*

3.3.1 Information security and data protection – Targets in the OTP Group Sustainability Report.

3.2.2 Quality information

Clients – Quality information – Impacts, Risks and Opportunities

Quality information provision ensures target information and understanding of financial products for all customers. Its implementation affects customers' well-being and financial situation, as a financial product can significantly impact a customer's life. This topic is primarily important for retail and SME customers, and its significance is even more pronounced for vulnerable social groups.

Managing quality of information as a material topic at OTP Bank

The provision of information and communication about banking products and services is a highly regulated area in our country. Responsible communication aims to ensure easier understanding and attention while complying with these rules. The group-level Tone of Voice manual includes clear and understandable language as a fundamental goal and expectation. The Bank supports good financial decisions and knowledge expansion through educational videos and calculatirs.

ESRS S4-1: Policies

OTP Bank has a responsible marketing policy and a financial awareness strategy on quality information, which are the same as the Group's policies.

The @responsible marketing policy sets out that OTP Bank is committed to the responsible marketing of its products, giving priority to fair commercial communication, correct information and product offerings. OTP Bank takes the utmost care to provide its existing and prospective customers with accurate, clear and comprehensive information about its products and services and the conditions of their use, as well as to comply with consumer protection regulations. The document that supports the implementation of the policy is the group-level **Tone of Voice Manual,** which sets out the Bank's communication style.

By implementing a financial awareness strategy, we aim to increase the number of customers who are financially literate, confident and aware in managing their finances, with a product portfolio that supports their goals. The creation of the strategy was motivated by OTP Bank's adherence to the UN Principles for Responsible Banking (UNEP FI PRB), whereby it committed to reduce its negative and increase its positive social impact on financial awareness and access. More details on the policy and strategy supporting quality information can be found in the Policies subsection of section 3.3.2 Access to Quality Information in the OTP Group Sustainability Report.

ESRS S4-4: Actions

OTP Bank's quality information actions include customer education on the use of various financial products, digital channels and tools, as well as financial awareness campaigns. The Bank is implementing its actions in line with the OTP Group, details of which can be found in the subsection Actions in section 3.3.2 Access to Quality Information in the OTP Group Sustainability Report.

ESRS S4-5: Targets

A comprehensive, measurable target for quality information will be set in the Financial Awareness Strategy in 2025 in relation to the following:

- increase the number of customers who are financially literate, confident and aware in managing their finances,
- customers have a product portfolio that supports their individual goals,
- improve positive branding and the image of OTP Bank.

The targets will be quantified and operationalised in the future. The effectiveness of quality information policies and actions was not actiond in 2024.

3.2.3 Access to financial products and services

Clients – Access to financial products and services – Impacts, Risks and Opportunities

Access to financial products and services can support or hinder customers' well-being and prosperity. In addition to ensuring accessibility for people with disabilities, it is essential to provide access for residents of disadvantaged areas and those in disadvantaged social situations. Ensuring access to financial products for disadvantaged customers requires careful consideration and strict regulation to protect the interests of depositors and prevent excessive indebtedness. The Bank can also support adequate housing, as mortgage loans are an important market segment in most areas of operation.

Managing access to financial products and services as a material topic at OTP Bank

Our goal is to expand the range of products that are partially or fully available digitally, ensuring that these processes are as convenient and accessible as possible for a wide range of customers. These solutions can also help improve access for residents of disadvantaged areas. The Bank pays attention to imparting knowledge related to the use of online channels. Accessibility is continuously improving.
In addition to market-based products, the Bank provides significant, state-supported mortgage loan options.

ESRS S4-1: Policies

The basic principles of access to products and services are also set out in the **Compliance Policy** (for a detailed description see @Governace Information), with the provision, as already described, that in the development of its products and access to its services, the Bank shall apply the ethical and consumer protection principles and standards that ensure a modern, high-quality and fair service that meets the needs of its customers. The Bank also has an accessibility strategy, in line with the Group's strategy. More details can be found in chapter 3.3.3 Access to financial products and services, subsection Policies in the OTP Group Sustainability Report.

ESRS S4-4: Actions

In order to ensure access to financial products, OTP Bank applies several actions. These include accessibility, mobile branches, the Social Lab, customer-focused product development and subsidised housing loans.

A dedicated project to promote accessibility takes into account the support for visually impaired, deaf and hard of hearing, and disabled customers. OTP Bank also informs its customers on the accessibility actions on its website (https://www.otpbank.hu/portal/hu/Akadalymentesseg). In addition, OTP Bank informs its customers about the facilities available for people living with reduced mobility, visual or hearing impairments in the "Accessibility Information" section of the branch locator on its website (https://www.otpbank.hu/portal/hu/Kapcsolat/Fiokkereso/) in the data sheets of each branch.
In order to establish and further develop appropriate service processes, the Bank is in regular contact with the relevant advocacy organisations, such as the Hungarian Association of the Deaf and Hard of Hearing (SINOSZ) and the Hungarian Federation of the Blind and Partially Sighted (MVGYOSZ).
The actions applied by OTP Bank in the area of physical and digital accessibility, as well as actions and programmes to support access to financial products (mobile bank branch, Social Lab, housing loans, prevention of over-indebtedness) and data are also presented in detail in the subsection Actions in section 3.3.3 Access to financial products and services in the OTP Group Sustainability Report.

ESRS S4-5: Targets

In addition to legal compliance, we will set targets for accessibility and availability of products and services we have set targets and in 2025 in the context of Social Lab.

Access points in low-populated or economically disadvantaged areas

GRI G4: FS13 Due to its extensive branch network, OTP Bank provides significant access for the population of disadvantaged areas to manage their finances in person. However, the density of bank branches and ATMs is lower in these areas.

Access points in disadvantaged areas*:

OTP Bank	Branches		ATM	
Number if access points – (as a % of total access points)	57	(18%)	197	(10%)
Number of new access points – (as a % of all new ones)	0	(0%)	11	(12%)
Number of terminated access point – (as a % of total closed)	6	(24%)	8	(22%)
Change from the previous year	(10)%		+2%	

* Areas defined by social, demographic, housing and living conditions, local economy and labor market, as well as infrastructural and environmental indicators (see Reporting Policy in Chapter S4).

Accessibility

The European Union Directive 2019/882 on the accessibility requirements for products and services also applies to OTP Bank.
The Directive covers the accessibility of branches, ATMs and digital platforms (website, internet banking, mobile banking).
OTP Bank aims to design and develop (in line with the new legal requirements) both its physical, personal (branch and contact centre, ATM network) and digital (mobile and internet banking) service channels in such a way that customers living with disabilities can also use all services and products.
By June 2025, our accessibility target is to equip all OTP Bank branches with disability-support devices, such as tactile indicators and customer-call systems, signage tablets and induction loops, as well as mobile ramps and disabled bells for disabled access. Our aim is to provide the possibility of using text-to-speech software and increasing font size (or using a large font size in the first place) on all ATMs, and to extend the functions of the text-to-speech software to all available functions. Our goal is to bring the OTP Bank website and digital channels to WCAG 2.1 Level A compliance. The Bank has been working towards accessibility since 2007 and has an Accessibility Strategy. The strategy is reviewed and fine-tuned every two years, and developments are adapted to this and to changes in legislation.
In terms of accessibility, we continuously monitor the deployment of support tools, and the current status is recorded in the Unified Branch Master Database, on the basis of which we can show our customers the accessibility framework for specific branches in our website branch locator. We also continuously monitor the delivery of internal trainings to improve the awareness and preparedness of our branch employees, in line with our standard training processes.

Progress against the accessibility targets set is as follows:

Bank branches			
Indicators	**Status at 31.12.2024 (nr)**	**Status at 31.12.2024**	**Target by 01.06.2025**
Number of bank branches	317	–	–
Number of wheelchair-accessible bank branches	316	99.7%	100%
Number of bank branches with tactile indicators	303	95.6%	100%
Number of bank branches with automatic ticketing machines	263	83.0%	100%
Number of ticketing machines with physical push-buttons	263	83.0%	100%
Number of bank branches with induction loops	317	100%	100%
Number of bank branches equipped with a sign language interpreting tablet	317	100%	100%
Number of bank branches accessible to the hearing impaired	317	100%	100%

ATMs			
Indicators	**Status at 31.12.2024 (nr)**	**Status at 31.12.2024**	**Target**
Number of ATMs	1,993	–	–
Number of wheelchair-accessible ATMs	1,475	76.3%	100%
Number of ATMs with Braille	1,411	73.0%	100%
number of ATMs equipped with a voice module for visually impaired customers (text-to-speech software)	1,411	73.0%	100%

During the design and development of the website and the content editing activities, we have taken into account the WCAG 2.1 Level A (and in some cases AA) recommendations, thus supporting navigation with alternative devices and the use of text-to-speech software. A comprehensive-complex accessibility test of the site will be carried out in the first half of 2025 as part of the Accessibility Act Compliance Project. The OTP InternetBank and MobilBank applications are currently partially accessible, with full accessibility expected in the first half of 2025.

Reporting policy in connection with chapter S4

The Bank has developed the group-level reporting practice for individual-level disclosures as well (see subchapter IRO-2), so the definitions, calculation methodologies and data requirements for customers also follow the guidelines set out in subchapter 3.4 Reporting Policy for heading S4 of the OTP Group Sustainability Report, extending to OTP Bank.

4. Governace Information

4.1 Business Conduct

During the Group's operations, we put primary focus on transparency, regulation, the definition of internal responsibilities and, thus, the broadest effective compliance with environmental, social and regulatory requirements. Communicating and promoting these issues among employees is a priority for the Bank, and the ways in which it seeks to inform and encourage its employees to comply with them include: intranet news and articles, branch knowledge management, international conferences, e-learning trainings, compliance officer network, OTP Gala, OTP Sports Day, OTP Family Day.

The chapter covers the material topics of corporate culture, compliance, anti-money laundering and corruption and bribery. For a better overview, we use a threefold structure: (1) corporate culture, compliance, (2) anti-money laundering, (3) corruption and bribery.

Business Conduct, compliance, AML – Impacts, Risks and Opportunities

OTP Bank's business conduct not only affects its direct partners and stakeholders but also influences employees' and customers' attitudes towards ethical business conduct. Corporate governance characteristics and transparent decision-making are also important to investors.
Anti-money laundering is crucial for the Bank, focusing on preventing customers' attempts at money laundering. Prudent and cautious practices are particularly important from a societal perspective.
Non-compliance with laws and regulations can result in fines and reputational damage. There is a significant expectation for the Bank to actively participate in preventing money laundering. Violations of anti-money laundering rules can also cause liquidity problems and the termination of correspondent banking relationships. Violations of business ethics rules can lead to dissatisfaction and complaints from employees and business partners.

Managing corporate culture and business conduct as a material topic at OTP Bank

The Bank considers compliance with legal requirements, international standards, norms, including applicable sanction rules, and ethical expectations as fundamental. The foundations and guidelines of ethical business conduct are summarized in the Code of Ethics. Compliance awareness is continuously developed.
Preventing money laundering and terrorist financing (AML/CFT) is important, so the Bank acts prudently in uncovering potential abuses and takes necessary steps. In accordance with AML/CFT laws and requirements, one of the Bank's main obligations is to conduct appropriate customer due diligence actions; efficiency is enhanced through engaging with authorities and advocacy organizations.
The Bank manages risks within the framework of operational risks. Risk assessment is carried out as part of the Annual Group-level Risk and Control Self-Assessment and scenario analysis. Additionally, an annual AML Risk Assessment is conducted and actions to mitigate risks are determined based on the results of these assessments.

ESRS G1-1: Policies on Corporate Culture and Business Conduct[27]

Two of the most important policies of OTP Bank, as defined by the OTP Group, regarding corporate culture and business conduct are the Code of Ethics and the Compliance Policy.
A Gift Policy is annexed to the Code of Ethics. The Sanctions Policy, the Anti-Corruption Policy and the Anti-Money Laundering and Counter Terrorist Financing Policy are parts of the Compliance Policy.
The most important policies and their extracts are publicly available on the OTP Bank website under the @Due Diligence information.
The OTP Bank's policies and the included expectations on business conduct (including the Code of Ethics, Partner Code of Ethics, Compliance Policy, Anti-Money Laundering and Counter Terrorist Financing Policy, Anti-Corruption Policy) are the same as the Group's policies, details of which are presented in subsection 4.1 Corporate Governance – Policies on Corporate Culture and Business Conduct in the OTP Group Sustainability Report.

Actions and targets

The actions and targets set for OTP Bank to promote corporate culture and compliance, to fight money laundering and anti-corruption, such as the operation of an ethics reporting system, ethics training and awareness raising, AML whistleblowing system, are in line with these actions of the OTP Group. A detailed description of these is provided in subsection 4.1 Policies on corporate culture and business conduct in the OTP Group Sustainability Report.

Activities aimed at combatting corruption

The anti-corruption training system, which is implemented in the framework of the ethics training, is considered a action of OTP Group concerning anti-corruption behaviour.

[27] In addition to the policy, disclosure requirement G1-1 also requires the presentation of information to promote corporate culture, which are considered actions and targets under the ESRS.

Business Conduct: Corruption and Bribery – Impacts, Risks and Opportunities

The effectiveness of corruption prevention impacts the efficiency of resource utilization. Due to its size, OTP Bank's anti-corruption practices can influence economic morale, particularly within the sector.

Taking actions on Corruption and Bribery at OTP Bank

The Bank applies zero tolerance to all forms of bribery and unlawful advantage. The effectiveness is supported by the implementation of a comprehensive anti-corruption program.

ESRS G1-3: Preventing and detecting corruption and bribery

The foundations of OTP Bank's anti-corruption practices are the requirements set out in the and the @Compliance Policy as described in detail in subsection 4.1 Business conduct – Preventing and detecting corruption and bribery in the OTP Group Sustainability Report. The same section presents the Bank's risk-based assessment and the actions taken to detect and prevent corruption and bribery.

Violations of the provisions of the Anti-Corruption Policy may be reported through the channels set out in the Code of Ethics and @Partner Code of Ethics and the investigation is also carried out in accordance with the procedures for operating the ethics/whistleblowing system[28] (see @Ethics whistleblowing system). Additional practices relating to corruption and bribery are the same as those described in section 4.1 Corporate Governance in the OTP Group Sustainability Report, reporting to governing bodies and committees under G1 GOV-1, policies under G1-1, similar to the training, given that the topic of corruption and bribery is part of the ethics training.

ESRS G1-4: Cases of corruption and bribery

During the reporting period, no confirmed cases of corruption or bribery were identified in the Bank's operations, and therefore no related fines were incurred.
Information on the Group's other types of violations is presented in the subsection ESRS G1-4: Corruption and bribery in section 4.1 Corporate Governance in the OTP Group Sustainability Report. This includes competition, consumer protection and ethics investigations and their results.

[28] In compliance with Article 116 of the Hpt. and the internal abuse reporting system under the Whistleblowing Act.

Summary of the completed regulatory proceedings and the total amount of fines paid by the members of the OTP Bank.

GRI 2-27 **Closed proceedings by authorities, and other legal procedures, fines paid, OTP Bank – 2024:**

	All closed cases	Number of significant cases	All cases closed with fines	Total fine paid	Fine charged for practice applied in 2024	Fine charged for practice applied in earlier period
		pcs			HUF million	
Violation of competition rules*	0	0	0	0	0	0
Violation of consumer protection rules	65	0	36	15.5	15.5	0
Violation of rules on equal opportunity (own workforce)	0	0	0	0	0	0
Violation of rules on equal opportunity (not own workforce	0	0	0	0	0	0
Violation of accessibility rules	0	0	0	0	0	0
Supervisory procedures	9	1	3	112	112	0
Violation of IT security/Cyber security rules	0	0	0	0	0	0
Violation of taxation rules	0	0	0	0	0	0
Violation of environmental rules	0	0	0	0	0	0
Violation of marketing communication rules	0	0	0	0	0	0
Violation of information provision rules	1	0	1	0.6	0.6	0
Violation of marketing communication and information provision rules	0	0	0	0	0	0
Violation of data protection rules	7	0	0	0	0	0
Violation of anti-corruption and anti-bribery rules	0	0	0	0	0	0
Violation of labour law rules	0	0	0	0	0	0
Violation of health and safety rules	1	0	1	0.34	0	0.34
Other proceedings	0	0	0	0	0	0
Total 2024	**83**	**1**	**41**	**128.44**	**128.1**	**0.34**

The regulatory practices of individual countries can differ significantly, which contributes to the significant differences in the number of procedures.
* This also includes cases related to violations of antitrust and monopoly rules.

Reporting policy in connection with chapter G1

The Bank has developed the group-level reporting practice for individual-level disclosures as well (see subchapter IRO-2), so the definitions, calculation methodologies and data requirements relating to governance information also follow the guidelines presented in subchapter 4.1 Reporting policy for heading G1 in the OTP Group Sustainability Report, extending to OTP Bank.


Business
Ethics

5. ESRS Index

ESRS Standard code	ESRS Standard name	Disclosure requirement code	Disclosure requirement name	Appearance in the report	Reference to another document	Comment
ESRS 2	General disclosures	BP-1	General basis for preparing sustainability statements	General information		
		BP-2	Disclosures relating to specific circumstances	General information		
		GOV-1	The role of the administrative, management and supervisory bodies	General information		
		GOV-2	Information provided to the company's administrative, management or supervisory bodies and the sustainability issues they address	General information		
		GOV-3	Building sustainability-related performance into incentive mechanisms	General information		
		GOV-4	Statement on due diligence	General information		
		GOV-5	Risk management and internal control over sustainability reporting	General information		
		SBM-1	Strategy, business model and value chain	General information		
		SBM-2	Interests and views of stakeholders	General information		
		SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	General information		
		IRO-1	Description of procedures for identifying and assessing material impacts, risks and opportunities	General information		
		IRO-2	Disclosure requirements under ESRS covered by an enterprise's sustainability statements	General information		
ESRS E1	Climate change	ESRS 2 GOV-3	Building sustainability-related performance into incentive mechanisms	Environmental information		
		E1-1	Climate change mitigation transition plan	Environmental information		
		ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	Environmental information		
		ESRS 2 IRO-1	Description of procedures for identifying and assessing material climate-related impacts, risks and opportunities	Environmental information		
		E1-2	Climate change mitigation and adaptation policies	Environmental information		
		E1-3	Actions and resources related to climate change policies	Environmental information		
		E1-4	Targets set for climate change mitigation and adaptation	Environmental information		
		E1-6	Gross and total GHG emissions in Scope 1, 2, 3	Environmental information		
		E1-7	GHG mitigation projects financed through GHG removals and carbon credits	Environmental information		
		E1-8	Internal carbon pricing	Environmental information		
		E1-9	Expected financial impacts from material physical and transition risks and potential climate-related opportunities		Not yet reported due to phased introduction	
ESRS E2	Pollution	ESRS 2 IRO-1	Description of the procedures for identifying and assessing material impacts, risks and opportunities associated with pollution	Environmental information		
ESRS E3	Water and marine resources	ESRS 2 IRO-1	Description of procedures for identifying and assessing material impacts, risks and opportunities related to water and marine resources	Environmental information		
		E3-1	Policies on water and marine resources	Environmental information		
		E3-2	Actions and resources related to water and marine resources	Environmental information		
		E3-3	Water and marine resources targets	Environmental information		
		E3-5	Expected financial impacts from material impacts, risks and opportunities related to water and marine resources		Not yet reported due to phased introduction	
ESRS E4	Biodiversity and ecosystems	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	Environmental information		
		ESRS 2 IRO-1	Description of procedures for identifying and assessing material impacts, risks and opportunities related to biodiversity and ecosystems	Environmental information		
		E4-1	A transition plan and the inclusion of biodiversity and ecosystems in the strategy and business model	Environmental information		
		E4-2	Biodiversity and ecosystems policies	Environmental information		
		E4-3	Actions and resources related to biodiversity and ecosystems	Environmental information		
		E4-4	Biodiversity and ecosystems targets	Environmental information		
ESRS E5	Resource use and circular economy	ESRS 2 IRO-1	Presentation of processes for identifying and assessing material impacts, risks and opportunities related to resource use and circular economy	Environmental information		
ESRS S1	Own workforce	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	Social information		
		S1-1	Policies on own workforce	Social information		
		S1-2	Processes in place to engage with own employees and employee representatives on impacts	Social information		
		S1-3	Processes for correcting negative impacts and channels for employees to raise concerns	Social information		
		S1-4	Actions on the material impacts on own workforce and approaches to mitigate material risks and exploit material opportunities related to own workforce and the effectiveness of these actions	Social information		
		S1-5	Targets to address material negative impacts, promote positive impacts and manage material risks and opportunities	Social information		
		S1-6	Characteristics of the enterprise's employees	Social information		
		S1-7	Characteristics of non-employees within own workforce		Not yet reported due to phased introduction	
		S1-9	Diversity indicators	Social information		
		S1-12	People living with disabilities		Not yet reported due to phased introduction	
		S1-13	Training and skills development indicators		Not yet reported due to phased introduction	
		S1-14	Health and safety indicators	Social information		
		S1-15	Work-life balance indicators		Not yet reported due to phased introduction	
		S1-16	Income actions (pay gap and total income)	Social information		
		S1-17	Incidents, complaints and serious human rights impacts	Social information		

ESRS Standard code	ESRS Standard name	Disclosure requirement code	Disclosure requirement name	Appearance in the report	Reference to another document	Comment
ESRS S4	Consumers and end users	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	Social information		
		S4-1	Policies concerning consumers and end-users	Social information		
		S4-2	Processes in place to cooperate with consumers and end-users on impacts	Social information		
		S4-3	Processes to correct negative impacts and channels for consumers and end-users to raise concerns	Social information		
		S4-4	Actions to address the material impacts on consumers and end-users, and approaches to managing the material risks and exploiting the material opportunities for consumers and end-users, and the effectiveness of these actions	Social information		
		S4-5	Targets to address material negative impacts, promote positive impacts and manage material risks and opportunities	Social information		
		GRI G4: FS 13*	Access points in low-populated or economically disadvantaged areas	Social information		
		GRI 418-1*	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Social information		
ESRS G1	Business conduct	ESRS 2 GOV-1	The role of administrative, supervisory and management bodies	Governance information		
		ESRS 2 IRO-1	Description of the processes for identifying and assessing material impacts, risks and opportunities	Governance information		
		G1-1	Policies on corporate culture and business conduct, and the corporate culture	Governance information		
		G1-3	Preventing and detecting corruption and bribery	Governance information		
		G1-4	Confirmed cases of corruption and bribery	Governance information		
		GRI 2-27*	Compliance with laws and regulations	Governance information		

* Entity specific disclosures.

6. List of data points from EU legislation

Disclosure requirement	Related datapoint	Appearance in the report	Reference to another document	Comment
ESRS 2 GOV-1	Gender breakdown in the Board of Directors paragraph 21, point d)		OTP Group sustainability report	
	Percentage of independent board members referred to in point (e) of paragraph 21		OTP Group sustainability report	
ESRS 2 GOV-4	Due diligence statement paragraph 30		OTP Group sustainability report	
ESRS 2 SBM-1	Participation in fossil fuel activities Paragraph 40 (d)(i)		Not relevant	
	Participation in activities related to the production of chemicals paragraph 40 (d)(ii)			
	Participation in activities related to disputed weapons, paragraph 40 (d)(iii)			
	Participation in activities related to tobacco production and production paragraph 40 (d)(iv)			
ESRS E1-1	2050 Climate neutrality transition plan paragraph 14		OTP Group sustainability report	
	Firms excluded from EU benchmarks aligned with the Paris Agreement paragraph 16, point (g)		OTP Group sustainability report	
ESRS E1-4	GHG emission reduction target paragraph 34	Environmental information		
ESRS E1-5	Use of energy from fossil sources, broken down by source (only sectors with a significant impact on climate) paragraph 38		Not relevant	
	Energy consumption and structure, paragraph 37			
	Energy intensity in relation to activities in sectors with a high climate impact paragraphs 40 to 43			
ESRS E1-6	Scope 1, 2, 3 gross and total GHG emissions paragraph 44	Environmental information		
	Gross GHG intensity paragraphs 53 to 55	Environmental information		
ESRS E1-7	GHG capture and carbon credits paragraph 56	Environmental information		
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks paragraph 66		Not yet reported due to phased introduction	
	Amounts of funds broken down into acute and chronic physical risk, paragraph 66 (a)			
	Location of significant assets exposed to substantial physical risk paragraph 66 (c)			
	Real estate assets book value breakdown by energy efficiency class paragraph 67 (c)		Not relevant	
	Extent of portfolio exposure to climate-related opportunities paragraph 69		Not yet reported due to phased introduction	
ESRS E2-4	Emissions to air, water and land of each pollutant listed in Annex II to the European PRTR Regulation European Pollutant Release and Transfer Register, paragraph 28		Not relevant	
ESRS E3-1	Water and marine resources paragraph 9	Environmental information		
	Dedicated policy, paragraph 13		Not relevant	
	Sustainable oceans and seas paragraph 14	Environmental information		
ESRS E3-4	Total water recycled and reused paragraph 28 (c)		Not relevant	
	Total water consumption in m3 per net revenue on own operations paragraph 29			
ESRS 2 - IRO 1 - E4	Paragraph 16 (a) i		Not relevant	
	Paragraph 16 (b)	Environmental information		
	Paragraph 16 (c)		Not relevant	
ESRS E4-2	Sustainable land/agriculture practices or policies paragraph 24 (b)			
	Sustainable oceans/seas practices or policies paragraph 24 (c)			
	Policies to address deforestation paragraph 24 (d)			
ESRS E5-5	Non-recycled waste paragraph 37 (d)		Not relevant	
	Hazardous waste and radioactive waste paragraph 39			
ESRS 2 - SBM3 - S1	Risk of incidents of forced labour paragraph 14 (f)	Social information		
	Risk of incidents of child labour paragraph 14 (g)	Social information		

Disclosure requirement	Related datapoint	Appearance in the report	Reference to another document	Comment
ESRS S1-1	Human rights policy commitments paragraph 20	Social information		
	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	Social information		
	processes and measures for preventing trafficking in human beings paragraph 22		Not relevant	
	workplace accident prevention policy or management system paragraph 23	Social information		
ESRS S1-3	grievance/complaints handling mechanisms paragraph 32 (c)	Social information		
ESRS S1-14	Number of fatalities and number and rate of work- related accidents paragraph 88 (b) and (c)	Social information		
	Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Social information		
ESRS S1-16	Unadjusted gender pay gap paragraph 97 (a)	Social information		
	Excessive CEO pay ratio paragraph 97 (b)	Social information		
ESRS S1-17	Incidents of discrimination paragraph 103 (a)	Social information		
	Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)		Not relevant	
ESRS 2 – SBM3 – S2	Significant risk of child labour or forced labour in the value chain paragraph 11 (b)		Not relevant	
ESRS S2-1	Human rights policy commitments paragraph 17 Policies related to value chain workers paragraph 18 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19		Not relevant	
ESRS S2-4	Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36		Not relevant	
ESRS S3-1	Human rights policy commitments paragraph 16 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17		Not relevant	
ESRS S3-4	Human rights issues and incidents paragraph 36		Not relevant	
ESRS S4-1	Policies related to consumers and end-users paragraph 16	Social information		
	Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Social information		
ESRS S4-4	Human rights issues and incidents paragraph 35	Social information		
ESRS G1-1	United Nations Convention against Corruption paragraph 10 (b)	Social information		
	Protection of whistleblowers paragraph 10 (d)		Not relevant	
ESRS G1-4	Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Governance information		
	Standards of anti- corruption and anti- bribery paragraph 24 (b)	Governance information		

Fight against corruption and against the practice of bribery

The Code of Ethics (https://www.otpbank.hu/static/portal/sw/file/OTP_EtikaiKodex_EN.pdf), the Partner Code of Ethics (https://www.otpbank.hu/static/portal/sw/file/OTP_Partneri_EtikaiKodex_EN.pdf) published in 2023 and the Anti-Corruption Policy of OTP Bank Group, approved in 2019, contains provisions on the fight against corruption and against the practice of bribery, as well as the enforcement of legal, fair and ethical conduct (https://www.otpgroup.info/ethical-declaration). As it can be read in the foreword of the Code and the Anti-Corruption Policy as well, the OTP Bank Plc. and its management have adopted the principle of zero tolerance towards corruption and bribery, taking a definite stance against all forms of corruption and giving full support to the fight against corruption. In addition, the Code states that "As an ethical and compliant institution, the Bank and its management are fully committed to ensuring observance of all relevant legislation, including anti-corruption statutes."

The OTP Bank Plc. has set up an ethics reporting system (whistleblowing), which is for the reporting and the handling of the reports on suspected or actual violation of the values set forth in the Code of Ethics, where anonymous reporting of ethics issues is also possible. The OTP Bank Plc. conducts inquiries for the purpose of detecting, preventing anomalies in connection with reports made or anomalies it became aware of otherwise.
In 2024, a total of 200 reports were received through the ethics Whistleblowing System of OTP Bank Plc., of which 44 reports were deemed necessary to conduct ethics proceedings. Ethical breaches were identified in 12 cases.
The OTP Bank Plc. has created and maintains its Code of Ethics to keep reputational risk and financial losses, which may incur in relation to corruption, bribery and discrimination, on a minimum level. Both employees and newcomers receive education on the Code of Ethics, and in addition, the acceptance to be bound by it is a prerequisite for their employment. In addition, all business partners and clients are communicated about the Anti-Corruption Policy and procedures through the Code of Ethics and Anti-Corruption Policy published publicly on the OTP Bank Plc.'s website and from 2023 the Partner Code of Ethics has been published on the Bank's website as well.
The Anti-Corruption Policy stipulates that, in view of the fact that existing and established relationships with contractual partners also contain the possibility of corruption, the OTP Bank Plc. will act prudently in its dealings with contractors, in particular in the tendering and preparation process, to minimise the risk of corruption. The OTP Bank Plc. establishes relationships with its contractual partners based on an assessment of professionalism, competence and competitiveness, and does not apply other non-professional selection criteria that contain the possibility of corruption. Based on the Compliance's proposal, the prohibition of corruption will be reflected in the contractual and regulatory documents used by the OTP Bank Plc. in a clearer and well-defined manner from 2023 onwards, through the inclusion of anti-corruption clauses in the business rules and standard contracts.
The clause will state from the very beginning of the business relationship that the contracting partner accepts OTP Bank Plc.'s anti-corruption principles, including the prohibition of corruption and the consequences of breaching this prohibition, which can even be termination of contract.
Any requests from third parties affecting human rights are treated by the OTP Bank Plc. as a priority.
We manage the risks regarding the fight against corruption and bribery within the framework of our operational risk management process. Our quarterly compliance reports cover the changes in risks as well as the steps necessary steps to manage them. The reports are presented to the Executive Steering Committee and the Board of Directors; the annual report is also submitted to the Supervisory Board.

Non-financial performance indicators

- **Internal audit:** 208 closed audits, 1,193 recommendations, 1,193 accepted recommendations.

- **Compliance with Budapest Stock Exchange (BSE) Recommendations (yes/no ratio):** 72 yes, 0 no.
- **Compliance:** 11 closed data- and consumer protection related investigations by the Compliance.
- **Bank security investigations, reports:** In 2024, we made 1,049 reports, 20 additions to reports and 356 notifications. Of the reports, 889 were on suspicion of fraud, 39 on suspicion of money laundering and 122 on suspicion of other crimes.
In terms of financial abuse, there is an increasing trend in housing loans, which amounted to approximately HUF 41 million in 2024. A detailed comparison of the development of losses from credit fraud with the data of 2023 shows that in 2023 the loss from personal loan fraud was HUF 22 million, while in 2024 it increased to HUF 39 million. In 2023, the loss due to fraud was HUF 852 thousand, while in 2024 it increased to HUF 1.2 million.
In 2024, there were no losses related to overdrafts, baby loans, home loans and CSOK applications.
Considering corporate credit fraud in the MSE and MLE sectors, the bank's losses amounted to HUF 4.7 billion in 2023, which decreased to HUF 1.2 billion in 2024.
In the area of online fraud against customers, as a result of the Bank's protective measures, the damage caused by the misuse of cash flows to the detriment of customers decreased by 32% to HUF 7.2 billion in 2024 compared to the data for 2023, when the damage to customers exceeded HUF 10 billion.
In addition, the operational fraud prevention measures and monitoring activities prevented customer losses of HUF 21.7 billion, which is more than three times the previous year's figure of HUF 6.5 billion.
Compared to the data of 2023, in contrast to other domestic banks, a decrease can be observed in the area of bank card fraud, both in terms of the number of fraud attempts and the value of successful fraud.
In 2024, the value of successful bank card misuse was HUF 3.5 billion, of which the value of successful transactions with OTP-issued cards was HUF 3.2 billion.
As a result of the newly introduced rules and improvements, the ratio of bank card fraud to sales has decreased compared to 2023, and is once again well below the European average published by Mastercard: OTP Bank 0.0253%, European average 0.0407%.
- **Ethics issues:** 200 ethics reports, establishing ethics offense in 12 cases.

LIST OF NON-AUDIT SERVICES BY SERVICE CATEGORIES USED BY THE BANK

The statutory audit of OTP Bank is carried out by **Ernst and Young Ltd.,** in addition to which the following services were contracted:

- Assurance engagements other than audits or reviews of historical financial information (ISAE 3000)
- Advisory engagements relating to fraud detection (forensic services)
- Issue of Comfort letters
- Engagements to perform agreed-upon procedures regarding financial information (AUP according to ISRS 4400)
- Consultation relating to interpretation and implementation of accounting standards and relating to accounting of potential future transaction
- Reviewing the internal processes and compliance with laws and regulations
- Trainings relating to changes in accounting regulations and professional interpretations – only general not OTP Group specific matters

STATEMENT

On behalf of OTP Bank Plc. we declare that, to the best of our knowledge, the separate and consolidated financial statements which have been prepared in accordance with the applicable accounting standards, present a true and fair view of the assets, liabilities, financial position and profit and loss of OTP Bank Plc. and its consolidated subsidiaries and associates, and give a fair view of the position, development and performance of OTP Bank Plc. and its consolidated subsidiaries and associates, describing the principal risks and uncertainties, and do not conceal facts or information which are relevant to the evaluation of the Issuer's position. Moreover, we declare that the Sustainability Report, as part of the Management Report, was prepared in accordance with sustainability reporting standards of the Accounting Act (Act C of 2000 on Accounting), the European Sustainability Reporting Standards (ESRS), and with the provisions of Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council (EU Taxonomy Regulation).

Budapest, 19 March 2025

Dr. Sándor Csányi
Chairman & CEO

László Bencsik
Chief Financial & Strategic Officer

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This is a translation of the Hungarian Report

Independent Limited Assurance Report

To the Shareholders of OTP Bank Nyrt.

Scope

We have been engaged by OTP Bank Nyrt. ("the Company") to perform a 'limited assurance engagement', as defined by Hungarian National Standards on Assurance Engagements, hereafter referred to as "the Engagement", to report on the Consolidated Sustainability Statement of the Company and its subsidiaries (altogether the "Group") at 31 December 2024 and for the year then ended, presented in section OTP Group's Sustainability Report 2024 of the consolidated management report, included in the accompanying 529900W3MOO00A18X956-2024-12-31-0-hu.zip digital file[1].

Criteria applied by the Group

In preparing the Consolidated Sustainability Statement, the Group applied the requirements set out in VI/C Chapter of Act C of 2000 on Accounting ("Hungarian Accounting Law") on consolidated sustainability statement, including compliance with:

- the European Sustainability Reporting Standards adopted by the EU Directive 2013/34 ("ESRS"), and the requirements relevant for the process carried out to identify the sustainability information reported pursuant to ESRS ("Double Materiality Assessment"), and
- the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (the "Taxonomy Regulation");

all together referred as the Criteria.

Responsibilities of management and those charged with governance

The Company's management is responsible for presenting the Consolidated Sustainability Statement in accordance with the Criteria in all material respects, including the compliance with Hungarian Accounting Law, ESRS and Taxonomy regulation.

This responsibility includes selection and application of appropriate sustainability reporting methods, making assumptions and estimates that are reasonable in the circumstances, maintaining adequate records, establishing and maintaining internal controls that management determines are necessary to enable the preparation of the Consolidated Sustainability Statement, that it is free from material misstatement, whether due to fraud or error.

[1] Digital identification of the above referred 529900W3MOO00A18X956-2024-12-31-0-hu. digital file, using SHA 256 HASH algorithm is 2B33978C37F00406AEDF9CCAF775958947724BDDA8B8704577BDF8EA8629E8B1

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Management of the Company is responsible for the Double Materiality Assessment to identify the information to be reported in the Consolidated Sustainability Statement in accordance with ESRS and for disclosing this process in the Consolidated Sustainability Statement.

This responsibility includes:

- understanding the context in which the Company's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the entity's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances

The management of the Company is further responsible for the additional entity-specific disclosures selected are suitable in accordance with ESRS and available to the users of the Consolidated Sustainability Statement.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.

Auditor's responsibilities and limitations

Our responsibility is to express a conclusion on the presentation of the Consolidated Sustainability Statement based on the evidence we have obtained.

We conducted our engagement in accordance with the Hungarian National Standards for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE 3000 (Revised)") and for Assurance engagements on Greenhouse gas Statements ("ISAE 3410") and with applicable laws and regulations in Hungary.

Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Consolidated Sustainability Statement in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error. Misstatements are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Consolidated Sustainability Statement as a whole. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) and ISAE 3410 we exercise professional judgement and maintain professional skepticism throughout the engagement.

In reporting forward-looking information in accordance with ESRS, management of the Company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Consolidated Sustainability Statement, management of the Company interprets undefined legal and other terms, which may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our independence and quality management

We are independent of the Company in accordance with the applicable ethical requirements according to relevant laws in effect in Hungary and the policy of the Chamber of Hungarian Auditors on the ethical rules and disciplinary proceedings and, concerning matters not regulated by any of these, with the International Ethics Standards Board of Accountants' (IESBA) International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with these requirements.

Our firm also applies Hungarian National Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we obtained understanding and considered the effectiveness of Company's internal controls, processes and information systems relevant to the preparation of Double Materiality Assessment and the Consolidated Sustainability Statement when determining the nature and extent of our procedures, our limited assurance engagement was not designed to provide assurance on design and operating effectiveness of the internal controls, processes and information systems, including the outcome of the Double Materiality Assessment. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Consolidated Sustainability Statement and related information and applying analytical and other appropriate procedures.

Our procedures included the following, we:

1. involved sustainability specialists to evaluate compliance of the Consolidated Sustainability Statement with the Criteria,
2. conducted interviews with the relevant persons at the Company to obtain an understanding of the Company's governance structure, policies, internal controls and information systems relevant for the preparation and presentation of the Consolidated Sustainability Statement,
3. conducted interviews with key personnel of the Company responsible for sustainability reporting, including the application of the Criteria during the reporting process,
4. obtained an understanding of the Double Materiality Assessment to understand the sources of the information used by management, reviewed the Company's internal documentation and assessed whether the Double Materiality Assessment is in accordance with ESRS and with the description disclosed in Consolidated Sustainability Statement,
5. conducted risk assessment including setting levels of materiality and identified sustainability information and disclosures of the Consolidated Sustainability Statement where risk of material misstatements are likely to arise, whether due to fraud or error,
6. involved component assurance teams based on the risk assessment,
7. evaluated whether information identified by the Double Materiality Assessment as material information is included in the Consolidated Sustainability Statement,
8. evaluated whether the structure and the presentation of the Consolidated Sustainability Statement is in accordance with the ESRS,
9. on selected material sustainability information and disclosures of the Consolidated Sustainability Statement we performed procedures as follows:
    a. conducted interviews with key personnel from relevant organizational units of the Company to obtain understanding of the process for collecting, collating and reporting the sustainability information and disclosures,

b. obtained evidence on the methods for developing material estimates and forward-looking information and on how these methods were applied
c. designed and executed appropriate review procedures including among others analytical review procedures, sample testing, recalculation and inspection of substantiating evidence,
d. evaluated the mathematical accuracy of quantitative sustainability information and disclosures,
e. reviewed the boundaries of reporting and whether there are material omissions in accordance with ESRS,
f. evaluated the completeness and compliance with ESRS and the mandatory disclosures therein,
g. evaluated the appropriateness of entity-specific disclosures
h. reviewed consistency with the consolidated financial statements of the Company for the year ended 31 December 2024, and with other information obtained from interviews, internal policies and other communications and publications about the Group's sustainability agenda and strategy,

10. obtained an understanding of the process to calculate the Green Asset Ratio and the preparation of corresponding disclosures in the Sustainability Statement and evaluated the completeness and compliance with Taxonomy Regulation.

We also performed such other procedures as we considered necessary in the circumstances.

Other matters

Our limited assurance engagement does not extend to information disclosed in the Consolidated Sustainability Statement in respect of earlier periods.

Section 134/L of the Hungarian Accounting Law requires that we provide limited assurance conclusion on the compliance of the Consolidated Sustainability Statement prepared in the electronic reporting format (XHTML) with the tagging requirements in accordance with the applicable ESEF taxonomy set out in Commission Delegated Regulation (EU) 2019/815 (ESEF Regulation) relevant for sustainability disclosures, including those required according to article 8 of Regulation (EU) 2020/852 as well. Considering that the ESEF taxonomy relevant for sustainability statement has not been adopted yet, the Company, as it is presented in Section 1.1. Basis for preparation of the report of the Consolidated Sustainability Statement, was unable to carry out the tagging of the sustainability disclosures, and consequently we are unable to draw any conclusion in this regard.

Building a better
working world

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Consolidated Sustainability Statement, in order for it to be in accordance with the Criteria.

Budapest, 19 March 2025

(The original Hungarian version has been signed.)

Kónya Zsolt
Engagement partner
Ernst & Young Kft.
1132 Budapest, Váci út 20.
Registration No. 001165

Kónya Zsolt
Registered auditor
Chamber membership No.: 007383

Management's Report of the 2024 results of the OTP Bank (consolidated)

CONSOLIDATED FINANCIAL HIGHLIGHTS[1] AND SHARE DATA – NEW METHODOLOGY

In accordance with the recommendation stated in the current circular of the MNB on the application of MoF Decree no. 24/2008 on the detailed rules regarding the disclosure requirements applicable to publicly offered securities, OTP Bank Plc. as issuer prepares and publishes this Management Report combined with the Business Report required in the Accounting Act in a single document. The scope of adjustment items presented on consolidated level changed from 2024. According to the **new methodology** applied from 2024, only the goodwill impairment and the direct effect of acquisitions adjustment items are carved out and presented on consolidated level. For the sake of comparability, in the summary the relevant consolidated tables are presented in accordance with both the old and the new methodologies. For details, see *Supplementary data* annex.

[1] Structural adjustments made on consolidated IFRS profit and loss statement as well as balance sheet, together with the calculation methodology of adjusted indicators are detailed in the *Supplementary data* section.

Main comonents of P&L account	2023 HUF million	2024 HUF million	Change %
Consolidated profit after tax	**990,459**	**1,076,139**	**9**
Adjustments (after tax)	85,507	0	
Consolidated adjusted profit after tax	904,952	1,076,139	19
Pre-tax profit	1,179,224	1,386,883	18
Operating profit	1,265,909	1,545,377	22
Total income	2,245,706	2,633,908	17
Net interest income	1,461,850	1,782,604	22
Net fees and commissions	478,119	545,631	14
Other net non-interest income	305,737	305,673	0
Operating expenses	(979,797)	(1,088,531)	11
Total risk costs	(86,685)	(158,494)	83
Corporate taxes	(274,272)	(310,743)	13
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	39,609,144	43,419,128	10
Total customer loans (net, FX-adjusted)	22,549,534	23,361,638	4
Total customer loans (gross, FX-adjusted)	23,610,743	24,334,694	3
Performing (Stage 1+2) customer loans (gross, FX-adjusted)	**22,596,102**	**23,447,715**	**4**
Allowances for possible loan losses (FX-adjusted)	(1,061,208)	(973,056)	(8)
Total customer deposits (FX-adjusted)	**30,937,627**	**31,666,399**	**2**
Issued securities	2,095,548	2,593,124	24
Subordinated loans	562,396	369,359	(34)
Total shareholders' equity	4,094,793	5,120,012	25
Performance Indicators	**2023**	**2024**	**pps**
ROE (from profit after tax)	27.2%	23.5%	(3.7)
ROE (from adjusted profit after tax)	24.9%	23.5%	(1.4)
ROA (from profit after tax)	2.7%	2.6%	(0.1)
ROA (from adjusted profit after tax)	2.4%	2.6%	0.1
Operating profit margin	3.41%	3.71%	0.30
Total income margin	6.04%	6.32%	0.28
Net interest margin	3.93%	4.28%	0.34
Cost-to-asset ratio	2.64%	2.61%	(0.03)
Cost/income ratio	43.6%	41.3%	(2.3)
Provision for impairment on loan losses-to-average gross loans ratio	0.34%	0.38%	0.05
Total risk cost-to-asset ratio	0.23%	0.38%	0.15
Effective tax rate	23.3%	22.4%	(0.9)
Net loan/deposit ratio (FX-adjusted)	73%	74%	1
Capital adequacy ratio (consolidated, IFRS) – Basel3	18.9%	20.3%	1.4
Tier 1 ratio – Basel3	16.6%	18.9%	2.3
Common Equity Tier1 ('CET1') ratio – Basel3	16.6%	18.9%	2.3
Share data	**2023**	**2024**	**%**
EPS diluted (HUF) (from profit after tax)	3,693	4,050	10
EPS diluted (HUF) (from adjusted profit after tax)	3,380	4,066	20
Closing price (HUF)	15,800	21,690	37
Highest closing price (HUF)	16,030	22,100	38
Lowest closing price (HUF)	9,482	15,600	65
Market Capitalization (EUR billion)	11.6	14.8	28
Book Value Per Share (HUF)	15,294	19,346	26
Tangible Book Value Per Share (HUF)	14,589	18,511	27
Price/Book Value	1.0	1.1	9
Price/Tangible Book Value	1.1	1.2	8
P/E (trailing, from profit after tax)	4.5	5.6	26
P/E (trailing, from adjusted profit after tax)	4.9	5.6	15
Average daily turnover (EUR million)	15	18	23
Average daily turnover (million share)	0.5	0.4	(14)

CONSOLIDATED FINANCIAL HIGHLIGHTS AND SHARE DATA – OLD METHODOLOGY

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Consolidated profit after tax	**990,459**	**1,076,139**	**9**
Adjustments (after tax)	(18,123)	(69,342)	283
Consolidated adjusted profit after tax	1,008,583	1,145,481	14
Pre-tax profit	1,222,328	1,415,617	16
Operating profit	1,260,850	1,521,636	21
Total income	2,224,584	2,607,481	17
Net interest income	1,459,694	1,778,520	22
Net fees and commissions	478,146	545,631	14
Other net non-interest income	286,745	283,329	(1)
Operating expenses	(963,734)	(1,085,845)	13
Total risk costs	(38,521)	(106,018)	175
Corporate taxes	(213,746)	(270,136)	26
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	39,609,144	43,419,128	10
Total customer loans (net, FX-adjusted)	22,549,534	23,361,638	4
Total customer loans (gross, FX-adjusted)	23,610,743	24,334,694	3
Performing (Stage 1+2) customer loans (gross, FX-adjusted)	**22,596,102**	**23,447,715**	**4**
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ROE (from profit after tax)	27.2%	23.5%	(3.7)
ROE (from adjusted profit after tax)	27.7%	25.0%	(2.7)
ROA (from profit after tax)	2.7%	2.6%	(0.1)
ROA (from adjusted profit after tax)	2.7%	2.7%	0.0
Operating profit margin	3.39%	3.65%	0.26
Total income margin	5.99%	6.25%	0.27
Net interest margin	3.93%	4.27%	0.34
Cost-to-asset ratio	2.59%	2.60%	0.01
Cost/income ratio	43.3%	41.6%	(1.7)
Provision for impairment on loan losses-to-average gross loans ratio	0.16%	0.34%	0.18
Total risk cost-to-asset ratio	0.10%	0.25%	0.15
Effective tax rate	17.5%	19.1%	1.6
Net loan/deposit ratio (FX-adjusted)	73%	74%	1
Capital adequacy ratio (consolidated, IFRS) – Basel3	18.9%	20.3%	1.4
Tier 1 ratio – Basel3	16.6%	18.9%	2.3
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Closing price (HUF)	15,800	21,690	37
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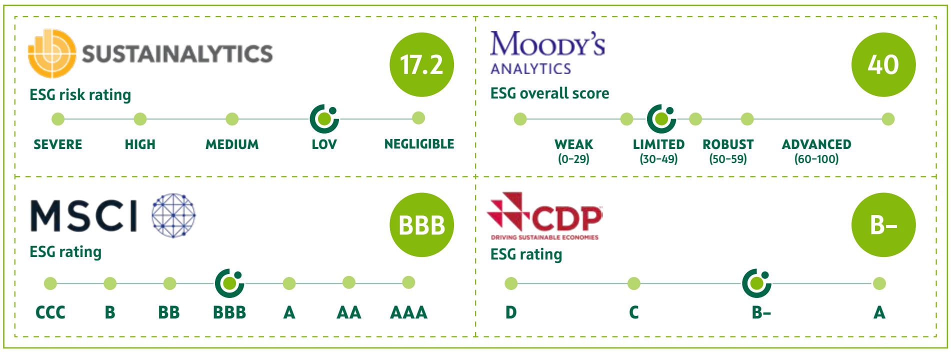
Price/Tangible Book Value	1.1	1.2	8
P/E (trailing, from profit after tax)	4.5	5.6	26
P/E (trailing, from adjusted profit after tax)	4.4	5.3	21
Average daily turnover (EUR million)	15	18	23
Average daily turnover (million share)	0.5	0.4	(14)

Actual credit ratings

S&P GLOBAL	
OTP Bank and OTP Mortgage Bank – FX long-term issuer credit rating	BBB-
OTP Bank – Dated subordinated FX debt	BB
MOODY'S	
OTP Bank – FX long-term deposits	Baa1
OTP Bank – Dated subordinated FX debt	Ba2
OTP Mortgage Bank – Covered bonds	A1
SCOPE	
OTP Bank – Issuer rating	BBB+
OTP Bank – Dated subordinated FX debt	BB+
LIANHE	
OTP Bank – Issuer rating (China national scale)	AAA

Actual ESG ratings



Awards

Members of the Group **won the Bank of the Year award in four countries** in the prestigious international competition organised by **The Banker magazine,** part of the Financial Times Group: Albania, Bulgaria, Hungary and Slovenia.

PWM magazine, a sister publication of The Banker, selected OTP Bank as the best private bank in Central and Eastern Europe in terms of customer service.

Global Finance magazine announced the winners of the Sustainable Finance Awards. **OTP Group** was chosen as the **winner in one global category** *("The best bank in the world in terms of loans related to transition and sustainability"),* **in two regional categories and in one country.**

S&P Global Market Intelligence performance ranking, 2024

In 2024, S&P Global Market Intelligence OTP Bank was identified as the leading performer among the 50 largest publicly listed European banking institutions.

otpbank

MANAGEMENT'S ANALYSIS OF THE FULL-YEAR 2024 RESULTS OF OTP GROUP

Consolidated earnings: HUF 1,076 billion profit after tax in 2024 with an ROE of 23.5%; 9% y-o-y organic increase in performing loans, improving margin, cost efficiency and capital adequacy ratios

In 2024 the Group's profit after tax exceeded HUF 1,076 billion, which is consistent with 9% annual profit growth, while annual ROE reached 23.5%. The earnings per share (EPS) for 2024 hit HUF 4,050, whereas the end-2024 book value per share amounted to HUF 19,346. In 2024 all geographical segments reported positive results, the share of foreign profit contribution reached 68%.

On 30 July 2024 the financial closure of the sale of the Romanian bank was completed, consequently, starting from 3Q the consolidated financial statements no longer include the contribution from the Romanian segment. On 22 August 2024 the legal merger of the two Slovenian subsidiary banks of the Group, SKB Banka and Nova KBM was successfully completed. Following this, the operational merger was also successfully concluded.

The annual P&L dynamics were shaped, on one hand, by the positive adjustment items in the amount of HUF 85.5 billion (after tax) in the 2023 base period related to the direct effect of the two newly acquired banks' consolidation and the one-off direct effects of the sale of Romania. In 2024 no such adjustment items were presented, given that they remained below the materiality threshold. The acquired banks were conducive of the annual profit momentum through their on-going P&L contribution, too, whereas the divestment of the Romanian operation influenced rather volume dynamics. As for FX rate changes, the average rate of HUF weakened against the currencies of most foreign subsidiaries (by 3.4% against the EUR), but strengthened against the UAH and RUB. Out of the altogether 9% growth in the Group's profit after tax, 2 pps was attributable to the FX translation effect.

Cumulated adjusted profit after tax improved by 19%, whereas the organic[2] and FX-adjusted growth was 10% y-o-y.

The full-year operating profit increased by 22%, within that total revenues grew by 17% mainly driven by the 22% increase in net interest income (+20% organically and FX-adjusted), boosted by both expanding business volumes and improving net interest margin (by 34 bps to 4.28%). It was the margin improvement at OTP Core (Hungary) that was particularly salient: from the lows hit in 1Q 2023, it improved gradually and by 4Q 2024 it even surpassed the level prevailing before the war and the extremely high rate environment. On the contrary, margin erosion, which has characterised the recent past continued in the Eurozone and ERM 2 countries.

Net fees and commissions grew by 13% organically and FX-adjusted.

The other net non-interest income remained flat y-o-y despite significantly lower fair value adjustment of subsidized housing and baby loans at OTP Core (2024: HUF 26 billion, -HUF 62 billion y-o-y).On the other hand, in 3Q 2024 HUF 10.5 billion positive one-off item occurred on consolidated level in relation to the sale of the Romanian bank, mainly presented on consolidated level amongst other net non-interest income.

Operating costs went up by 11% organically and FX-adjusted. The annual cost to income ratio improved by 2.3 pps to 41.3%.

Total risk costs increased by 83% to HUF 158 billion, within that credit risk costs amounted to HUF 90 billion (+25%), corresponding with a credit risk cost ratio of 38 bps, against 34 bps in 2023. The impairment related to the Hungarian rate cap scheme, which was extended two times during 2024, amounted to HUF 10 billion. According to the effective

[2] Regarding the y-o-y changes in the different P&L lines in full-year 2024, organic growth is defined as follows: without the contribution of Ipoteka Bank (consolidated from July 2023) and the Romanian bank sold in July 2024, and without the HUF 10.5 billion one-off gain presented on the other income line in 3Q 2024 in the wake of the deconsolidation of Romania.

regulation, in Hungary the interest rate cap on the affected Hungarian mortgage loans is valid until 30 June 2025. Furthermore, in 4Q 2024 HUF 2.1 billion impairment was booked as a result of the extension of the Serbian interest rate cap scheme. The jump in other risk costs was caused mainly by the HUF 45 billion impairments created on Russian bonds held in the balance sheet of OTP Bank (Hungary) and DSK Bank (Bulgaria), of which HUF 37.6 billion was booked at OTP Bank (Hungary) and HUF 7.5 billion at DSK Bank (Bulgaria). At the end of 2024, the total gross Russian bond exposures at OTP Core and DSK Bank amounted to HUF 135 billion equivalent, of which HUF 114 billion equivalent not due exposures carried interest. As a result of the impairments made in the the course of 2024, the provision coverage on Russian bonds increased to 73%.
The full-year effective tax rate moderated by 0.9 pp y-o-y to 22.4%, as a result of several factors. Effective from 2024, the statutory corporate income tax rate was raised from 19% to 22% in Slovenia, and from 10% to 15% in Bulgaria as the global minimum corporate tax rate was adopted from 2024. In Ukraine the previously effective 25% tax rate was lifted to 50% in 4Q 2024 retroactively for the full-year. As opposed to this, total special banking taxes presented on the corporate income tax line moderated y-o-y. In 2024 HUF 51 billion special taxes on financial institutions weighed on earnings which incorporated both the old banking tax in Hungary (HUF 31 billion) and the windfall tax on extra profits (HUF 7 billion, taking into account the tax deduction opportunity). Outside of Hungary, in Slovenia (HUF 12 billion) and Romania (HUF 1 billion) arose banking tax payment obligations.
Consolidated credit quality remained stable, main credit quality indicators continued to develop favourably. The ratio of Stage 3 loans under IFRS 9 declined by 0.7 pp y-o-y to 3.6%. The own provision coverage of Stage 3 loans moderated by 1.3 pps y-o-y to 59.5%.
Consolidated performing (Stage 1+2) loans expanded by 9% y-o-y FX-adjusted, without the effect of the deconsolidation of Romania. Corporate + MSE loans posted 2% y-o-y growth, adjusted for the sale of Romania as well as the repayment of a big-ticket corporate loan held in the Hungarian, Bulgarian and Slovenian books, in the total amount of HUF 317 billion. It was also favourable that Ukrainian corporate loans expanded by 20% in 2024. Household loan volumes showed stronger momentum: mortgage exposures demonstrated a 14% y-o-y expansion organically and FX-adjusted, whereas consumer loans grew by 23%. In Bulgaria the y-o-y household loan growth was outstanding, but in 4Q the pace of growth in cash loans moderated in the wake of tightened macroprudential regulations. At the Uzbek Ipoteka Bank household loan, especially consumer loan growth was modest in 2024 in comparison with the growth rates prevalent in the previous year.
Consolidated deposits expanded by 6% y-o-y on an FX-adjusted basis and without the effect of the divestment of Romania. The expansion was driven by the household segment (+10%), while corporate + MSE deposits showed a more moderate pace (+2%), to a great extent driven by corporate deposit outflows in Hungary. It was positive that Hungarian household deposits expanded by 10% y-o-y. Uzbek deposits growth was outstanding (+48% y-o-y). The Group's net loan to deposit ratio hit 74% at the end of 2024, up by 1 pp y-o-y.
The volume of **issued securities** without retail bonds increased by 32% y-o-y. The volume of retail bonds stood at HUF 85 billion at the end of 2024, down by 58% y-o-y. The subordinated bonds and loans line declined by 34% y-o-y. All these changes were primarily attributable to OTP Bank (Hungary).
The full-year net comprehensive income exceeded HUF 1,290 billion. **Shareholders' equity** increased by more than HUF 1,000 billion or 25% over the last 12 month. In June 2024 altogether HUF 150 billion dividend was paid to shareholders, equivalent of HUF 539.5 per dividend-eligible share. In 2024 the deduction from shareholders' equity due to treasury shares increased by HUF 125 billion: first, the available HUF 60 billion amount under the first treasury share buyback program which started after the central bank's single permission dated 12 February 2024, was utilized on 13 August. Furthermore, on 22 August 2024 OTP Bank received another single permission from the National Bank of Hungary to repur-

chase own shares in the total amount of HUF 60 billion, under which treasury shares worth HUF 55 billion were repurchased until the end of 2024, while the available amount was fully utilized on 13 January 2025.

Consolidated capital adequacy ratios (in accordance with Basel III)

At the end of 2024, the consolidated Common Equity Tier1 (CET1) ratio according to IFRS and under the prudential scope of consolidation was 18.9%, marking 2.3 pps increase against the end of 2023. In the absence of AT1 instruments, this equals to the Tier 1 ratio. The consolidated capital adequacy ratio (CAR) stood at 20.3% at the end of December, underpinning an increase of 1.4 pps y-o-y.

At the end of 2024, the effective regulatory minimum requirement for the consolidated Tier1 capital adequacy ratio (without P2G) was 12.5% which also incorporated the effective SREP rate, whereas the minimum CET1 requirement was 10.7%.

Consolidated risk weighted assets (RWA) under the prudential scope of consolidation grew by 8% in the course of 2024. Within that, credit risk related RWA went up by 8%, or HUF 1,714 billion, mainly driven by FX-effect (+HUF 1,050 billion y-o-y RWA impact), organic and regulatory effects (+1,506) and the deconsolidation of Romanian entities (-842).

The consolidated Common Equity Tier1 (CET1) capital grew by 23% or HUF 897 billion y-o-y, mainly due to the eligible profit for the full-year amounting to HUF 815 billion after dividend deduction. In 2024 HUF 270 billion dividend was deducted, pursuant to the latest decision of the Management Committee. The final decision on the dividend amount will be made by the Annual General Meeting, upon the proposal of the Board of Directors. Items related to the other comprehensive income induced altogether HUF 216 billion y-o-y increase in the CET1 capital, mainly due to currency rate changes (revaluation reserves increased by HUF 190 billion y-o-y). This was partly counterbalanced by the HUF 126 billion y-o-y increase in the deduction relating to repurchased own shares.

MREL adequacy

As a result of recently raised MREL-eligible funds, against the mandatory minimum requirement of 24.2% for 31 December 2024, the MREL adequacy ratio of OTP Group reached 30.1% at the end of 2024. The ratio improved by 5.0 pps versus end-2023. In the course of 2024, OTP Bank issued EUR 1.84 billion equivalent MREL-eligible bonds. In 2024 OTP Bank redeemed altogether EUR 900 million MREL-eligible bonds.

Credit rating, shareholder structure

At the end of 2024, the following credit ratings were in place:

- OTP Bank's long-term issuer credit rating by S&P Global is 'BBB-', the outlook is stable; the credit rating of the dated Tier2 instrument is 'BB';
- the Senior Preferred bond rating by Moody's is 'Baa3', while the dated subordinated FX debt rating is 'Ba2'. On 4 December 2024, Moody's reaffirmed OTP Bank's ratings, and changed the outlook on long-term HUF and FX deposit ratings from stable to positive, and changed the outlook on the Senior Preferred debt from stable to negative. The outlook on the 'Baa3' long-term issuer rating of OTP Mortgage Bank was also changed to negative; the mortgage bond rating is 'A1';
- OTP Bank Plc' issuer rating and Senior Preferred bond rating at Scope Ratings is 'BBB+', the Senior Non-Preferred rating is 'BBB' and the subordinated debt rating is 'BB+'; all carry a stable outlook;
- OTP Bank Plc's Long-Term Issuer Credit Rating (China national scale) by the Chinese Lianhe Credit Rating Co. is 'AAA', the outlook is stable.

Regarding the ownership structure of the Bank, on 31 December 2024 the following investors had more than 5% influence (voting rights) in the Company: MOL Plc. (the Hungarian Oil and Gas Company, 8.79%), and Groupama Group (5.22%).


CREDIT RATING

POST-BALANCE SHEET EVENTS

Post-balance sheet events cover the period until 21 February 2025.

Hungary

- On 13 January 2025 OTP Bank's share buy-back program approved by the central bank on 22 August 2024 reached its maximum available amount of HUF 60 billion.
- On 24 January 2025 the Bank got another approval from the Hungarian National Bank to repurchase own shares in the amount of HUF 60 billion. The available amount was exhausted on 10 February 2025.
- From 13 January 2025 the consolidated MREL requirement is determined at 18.60% of the total risk exposure amount (RWA) and 6.02% of the total exposure measure (TEM) of the Resolution Group. The consolidated MREL requirement of OTP Bank applicable until this date was 18.94% and 5.78%. OTP Bank's Resolution Group consists of entities included in the prudential scope of consolidation of OTP Bank without the Slovenian OTP banka d.d. and its subsidiaries. Pursuant to the CRD OTP Bank has to meet the combined buffer requirement in addition to its MREL TREA requirement as institutions shall not use CET1 capital that is maintained to meet the combined buffer requirement to meet the risk-based component of the MREL requirement. This principle is applicable to the MREL TREA subordination requirement as well.
- On 30 January Tier2 notes have been issued in the aggregate nominal amount of USD 750 million. The notes carry an annual coupon of 7.3% due semi-annually. The tenor was 10.5NC5.5, i.e. in the period between five and five and a half years the bonds can be redeemed on any day. The notes were listed on the Luxembourg Stock Exchange.
- On 7 February the EUR 500 million Fixed to Floating Rate Perpetual Subordinated Notes have been redeemed and the principal amount, together with accrued and unpaid interest was paid to the holders of the Notes.
- On 17 February OTP Bank announced the redemption of its €650,000,000 7.350 per cent. Senior Preferred Fixed-to-Floating Callable Notes due 2026 with the optional redemption date of 4 March 2025.
- As of end of February, the banking sector related key initiatives of the 'New Economic Policy Action Plan' launched by government decree 1311/2024 (X. 21.), are as follows (based on the communication of the Government and submitted bills):
  - From 1 January 2025, minimum wage increased by 9%. For 2026 and 2027 further 13% and 14% hikes have been agreed as part of the three-year wage agreement, assuming that economic growth and inflation will be in line with the expectations.
  - From 2 January 2025 the Workers' Loan Program is available at Hungarian banks. The loan is designed for young people aged 17–25 who are not eligible for student loans and who are employed in Hungary for at least 20 hours a week, or entrepreneurs who have an average income and undertake to work or run a business in Hungary for a minimum of five years. The maximum amount of the interest-free, free use, state-guaranteed loan facility is HUF 4 million, with a term of 10 years. The scheme also provides support for childbearing, with repayments suspended for two years following the birth of the first and second child, and half of the current debt waived for the second child and the full debt waived after the third one.
  - From 1 January 2025, in case of green loans the loan-to-value limit was increased to 90%, furthermore the payment-to-income limit was increased to 60% regardless of the income.
  - On 1 January 2025, the home renovation program was reintroduced to support

families in towns with less than 5,000 residents, covering up to 50% of labor- and material costs with a cap of HUF 3 million. Those who have already availed themselves of the 2021–2022 home renovation subsidy are only eligible to utilize the new subsidy up to the amount of the HUF 3 million that remains unused at that time. From 1 February 2025, a state subsidized home renovation mortgage loan with a client interest rate of 3% and with up to HUF 6 million loan amount is available to finance investment costs.

- In 2025, voluntary pension fund savings can be used free of tax for housing loan repayments, repayment of secured loans, and modernization or renovation of existing homes. The total amount of voluntary pension savings could be utilized, but only up to the balance available as of 30 September 2024.
- From 1 January 2025, monthly HUF 150,000 fringe benefit can be paid to the employees under the age of 35 in order to support housing expenses (home rental or loan installment) above the current preferential upper limit of HUF 450,000 per year.
- Half of the accumulated amount on SZÉP Cards can be used for home renovation in 2025.
- Between 1 April and 31 October 2025, based on the individual decision of the participating banks, 5% interest rate cap will be available for under 35 years old, first-time home buyers for newly granted green housing loans, with properties under 60 square meter and price lower than HUF 1.2 million per square meter. The rate cap will be applied in the first 5 years of the loan, the product has neither disbursement nor credit assessment fees.
- From 6 January 2025, as part of the Demján Sándor program, export stimulating loan and leasing structures are available in the total sum of HUF 400 billion, partly refinanced by EXIM Hungary. Some of the products are also available for enterprises planning to start export activities in the future.
- The interest rate of certain products under the Széchenyi Card Program MAX+ scheme was significantly reduced for contracts concluded after 1 March 2025: the interest rate on investment loans (Agricultural Investment Loan, Investment Loan) and the leasing scheme was reduced to 3%, while the interest rate on the Széchenyi Card Overdraft MAX+ (including the Tourism Card) and the Liquidity Loan was reduced to 4.5%. The uniform 0.5 pp reduction in client interest rates was facilitated by the burden sharing of KAVOSZ Ltd. (0.1 pp) and the banking sector (0.4 pp). The investment loans with the exceptionally favorable interest rate of the "GREEN" sub-structure are an exception to this, which are still available to businesses with a rate of 1.5%.

- Changes in the economic policy leadership:
  - As of 31 December 2024, pursuant to Act LXXXVI of 2024, the Ministry of Finance ceased to exist by merging into the Ministry of National Economy. Minister Márton Nagy remained in office unchanged as head of the Ministry of National Economy.
  - As of 4 March 2025, the President of the Republic appointed Mihály Varga, the former Minister of Finance, to head the National Bank of Hungary.
- Based on preliminary data published by the Central Statistical Office on 30 January 2025, the performance of the Hungarian economy increased by 0.5% q-o-q and 0.4% y-o-y in the fourth quarter. With this, the annual growth in 2024 was 0.6%. The average inflation in 2024 was 3.7%.
- The Financial Stability Council of the Hungarian National Bank announced an extension to the central bank's green capital requirement relief programs for credit institutions. The deadline for these programs was extended by one year, until the end of December 2026. The decision on whether to grant further annual extensions will be made based on a professional indicator system. Additionally, from 31 January 2025, the range of exposures that can be included in the discount program was further expanded.

Moldova

- On 10 January 2025, the National bank of Moldova raised the base interest rate by 200 bps, from 3.6% to 5.6%.
- On 5 February 2025, the National Bank of Moldova further raised the base rate by 90 bps to 6.5%.

Ukraine

- According to the announcement on 6 January 2025, the European Bank for Reconstruction and Development (EBRD) will be supporting the lending activities of OTP's subsidiary bank in Ukraine through a scheme that facilitates the sharing of portfolio risk. The risk-sharing instrument will enable the Ukrainian subsidiary to provide new financing to the local private business sector, amounting to EUR 200 million. The credit risks of these enterprises will be covered by the scheme, with the coverage amounting to 50 percent of the outstanding debt.
- On 23 January 2025, the National Bank of Ukraine raised the policy rate by 100 bps to 14.5%.

Slovenia

- On 30 January 2025, ECB cut the policy rate by 25 bps from 3.00% to 2.75%.

An event, that occurred in January 2025 regarding an item reported in the Group's books as a receivable from lending activities, was identified by the Group as a post-balance sheet event. The Group believes that the event has no retrospective effect for 2024 concerning Stage classification, therefore the Group did not change the Stage 2 classification of the affected receivable as of 31 December 2024. However, given that the Group obtained additional information regarding the circumstances that previously justified the Stage 2 classification, the Group recognized an additional HUF 13.9 billion impairment loss for the receivable in the Stage 2 category for 2024.

CONSOLIDATED PROFIT AFTER TAX BREAKDOWN BY SUBSIDIARIES (IFRS)[3] – NEW METHODOLOGY

	2023 HUF million	2024 HUF million	Change %/pps
Consolidated profit after tax	**990,459**	**1,076,139**	**9**
Adjustments (after tax)	85,507	0	(100)
Consolidated adjusted profit after tax	**904,952**	**1,076,139**	**19**
Banks total[1]	848,803	1,001,112	18
OTP Core (Hungary)[2]	233,871	270,387	16
DSK Group (Bulgaria)[3]	198,182	200,765	1
OTP Bank Slovenia[4]	112,342	113,282	1
OBH (Croatia)[5]	53,333	61,743	16
OTP Bank Serbia[6]	58,211	66,496	14
Ipoteka Bank (Uzbekistan)[7]	(15,422)	52,893	
OTP Bank Ukraine[8]	44,908	41,179	(8)
CKB Group (Montenegro)[9]	21,358	24,194	13
OTP Bank Albania[10]	11,603	19,686	70
OTP Bank Moldova	14,624	11,492	(21)
OTP Bank Russia[11]	95,674	136,946	43
OTP Bank Romania[12]	20,120	2,050	(90)
Leasing	6,647	10,842	63
Merkantil Group (Hungary)[13]	6,647	10,842	63
Asset Management	19,861	24,747	25
OTP Asset Management (Hungary)	19,673	24,624	25
Foreign Asset Management Companies[14]	188	123	(34)
Other Hungarian Subsidiaries	35,972	24,369	(32)
Other Foreign Subsidiaries[15]	986	(939)	
Eliminations	(7,317)	16,009	
Adjusted profit after tax of the Hungarian operation[16]	298,679	340,617	14
Adjusted profit after tax of the Foreign operation[17]	606,274	735,523	21
Share of Hungarian contribution to the adjusted profit after tax	33%	32%	(1)
Share of Foreign contribution to the adjusted profit after tax	67%	68%	1

[3] Belonging footnotes are in the *Supplementary data* section of the Report.

CONSOLIDATED PROFIT AFTER TAX BREAKDOWN BY SUBSIDIARIES (IFRS) – OLD METHODOLOGY

	2023 HUF million	2024 HUF million	Change %/pps
Consolidated profit after tax	**990,459**	**1,076,139**	**9**
Adjustments (after tax)	(18,123)	(69,342)	283
Consolidated adjusted profit after tax	**1,008,583**	**1,145,481**	**14**
Banks total[1]	946,279	1,079,094	14
OTP Core (Hungary)[2]	302,935	338,075	12
DSK Group (Bulgaria)[3]	201,992	204,648	1
OTP Bank Slovenia[4]	128,730	122,464	(5)
OBH (Croatia)[5]	53,959	61,743	14
OTP Bank Serbia[6]	68,026	66,496	(2)
Ipoteka Bank (Uzbekistan)[7]	(21,857)	48,809	
OTP Bank Ukraine[8]	45,184	41,179	(9)
CKB Group (Montenegro)[9]	21,814	24,194	11
OTP Bank Albania[10]	15,032	19,686	31
OTP Bank Moldova	14,700	11,492	(22)
OTP Bank Russia[11]	95,665	136,946	43
OTP Bank Romania12	20,099	3,361	(83)
Leasing	10,267	12,326	20
Merkantil Group (Hungary)[13]	10,267	12,326	20
Asset Management	19,861	24,747	25
OTP Asset Management (Hungary)	19,673	24,624	25
Foreign Asset Management Companies[14]	188	123	(34)
Other Hungarian Subsidiaries	30,570	24,411	(20)
Other Foreign Subsidiaries[15]	986	(939)	
Eliminations	620	5,842	842
Adjusted profit after tax of the Hungarian operation[16]	365,979	409,831	12
Adjusted profit after tax of the Foreign operation[17]	642,604	735,650	14
Share of Hungarian contribution to the adjusted profit after tax	36%	36%	(1)
Share of Foreign contribution to the adjusted profit after tax	64%	64%	1

CONSOLIDATED STATEMENT OF RECOGNIZED INCOME – NEW METHODOLOGY

Main components of the adjusted Statement of recognized income	2023 HUF million	2024 HUF million	Change %
Consolidated profit after tax	**990,459**	**1,076,139**	**9**
Adjustments (after tax)	85,507	0	(100)
Goodwill impairment charges (after tax)	0	0	
Direct effect of acquisitions (after tax)	85,507	0	(100)
Consolidated adjusted profit after tax	904,952	1,076,139	19
Profit before tax	1,179,224	1,386,883	18
Operating profit	1,265,909	1,545,377	22
Total income	2,245,706	2,633,908	17
Net interest income	1,461,850	1,782,604	22
Net fees and commissions	478,119	545,631	14
Other net non-interest income	305,737	305,673	0
Foreign exchange result, net	123,313	163,475	33
Gain/loss on securities, net	(2,999)	12,410	(514)
Net other non-interest result	185,423	129,788	(30)
Operating expenses	(979,797)	(1,088,531)	11
Personnel expenses	(506,465)	(564,374)	11
Depreciation	(100,458)	(118,628)	18
Other expenses	(372,874)	(405,529)	9
Total risk costs	(86,685)	(158,494)	83
Provision for impairment on loan losses	(71,690)	(89,864)	25
Other provision	(14,995)	(68,631)	358
Corporate taxes	(274,272)	(310,743)	13
Performance Indicators	**2023**	**2024**	**%/pps**
ROE (from profit after tax)	27.2%	23.5%	(3.7)
ROE (from adjusted profit after tax)	24.9%	23.5%	(1.4)
ROA (from profit after tax)	2.7%	2.6%	(0.1)
ROA (from adjusted profit after tax)	2.4%	2.6%	0.1
Operating profit margin	3.41%	3.71%	0.30
Total income margin	6.04%	6.32%	0.28
Net interest margin	3.93%	4.28%	0.34
Net fee and commission margin	1.29%	1.31%	0.02
Net other non-interest income margin	0.82%	0.73%	(0.09)
Cost-to-asset ratio	2.64%	2.61%	(0.03)
Cost/income ratio	43.6%	41.3%	(2.3)
Provision for impairment on loan losses-to-average gross loans ratio	0.34%	0.38%	0.05
Total risk cost-to-asset ratio	0.23%	0.38%	0.15
Effective tax rate	23.3%	22.4%	(0.9)
Non-interest income/total income	35%	32%	(3)
EPS base (HUF) (from profit after tax)	3,695	4,052	10
EPS diluted (HUF) (from profit after tax)	3,693	4,050	10
EPS base (HUF) (from adjusted profit after tax)	3,382	4,068	20
EPS diluted (HUF) (from adjusted profit after tax)	3,380	4,066	20
Comprehensive Income Statement	**2023**	**2024**	**%**
Consolidated profit after tax	990,459	1,076,140	9
Fair value changes of financial instruments measured at fair value through other comprehensive income	78,419	47,751	(39)
Net investment hedge in foreign operations	(2,707)	(27,310)	909
Foreign currency translation difference	(200,928)	195,152	(197)
Change of actuarial costs (IAS 19)	(400)	(923)	131
Net comprehensive income	**864,843**	**1,290,810**	**49**
o/w Net comprehensive income attributable to equity holders	863,714	1,286,097	49
Net comprehensive income attributable to non-controlling interest	1,129	4,713	317
Average exchange rate* of the HUF	**2023 HUF**	**2024 HUF**	**Change %**
HUF/EUR	382	395	3
HUF/CHF	393	415	6
HUF/USD	353	365	3

* Exchange rates presented in the tables of this report should be interpreted as follows: the value of a unit of the other currency expressed in Hungarian forint terms, i.e. HUF/EUR represents the HUF equivalent of one EUR.

CONSOLIDATED STATEMENT OF RECOGNIZED INCOME – OLD METHODOLOGY

Main components of the adjusted Statement of recognized income	2023 HUF million	2024 HUF million	Change %
Consolidated profit after tax	**990,459**	**1,076,139**	**9**
Adjustments (after tax)	(18,123)	(69,342)	283
Dividends and net cash transfers (after tax)	(1,911)	0	(100)
Goodwill/investment impairment charges (after tax)	(3,919)	0	(100)
Special tax on financial institutions (after tax)	(62,551)	(45,452)	(27)
Expected one-off effect of the interest rate cap for certain loans in Hungary and Serbia (after tax)	(32,898)	(9,411)	(71)
Effect of the winding up of Sberbank Hungary (after tax)	10,389	0	(100)
Effect of acquisitions (after tax)	64,886	12,033	(81)
Result of the treasury share swap agreement (after tax)	10,680	11,556	8
Impairments on Russian government bonds at OTP Core and DSK Bank (after tax)	(2,799)	(38,068)	
Consolidated adjusted profit after tax	1,008,583	1,145,481	14
Profit before tax	1,222,328	1,415,617	16
Operating profit	1,260,850	1,521,636	21
Total income	2,224,584	2,607,481	17
Net interest income	1,459,694	1,778,520	22
Net fees and commissions	478,146	545,631	14
Other net non-interest income	286,745	283,329	(1)
Foreign exchange result, net	123,314	(13,754)	(111)
Gain/loss on securities, net	1,994	3,090	55
Net other non-interest result	161,436	293,993	82
Operating expenses	(963,734)	(1,085,845)	13
Personnel expenses	(503,959)	(564,374)	12
Depreciation	(95,561)	(118,628)	24
Other expenses	(364,215)	(402,844)	11
Total risk costs	(38,521)	(106,018)	175
Provision for impairment on loan losses	(34,781)	(79,522)	129
Other provision	(3,741)	(26,496)	608
Corporate taxes	(213,746)	(270,136)	26
Performance Indicators	**2023**	**2024**	**%/pps**
ROE (from profit after tax)	27.2%	23.5%	(3.7)
ROE (from adjusted profit after tax)	27.7%	25.0%	(2.7)
ROA (from profit after tax)	2.7%	2.6%	(0.1)
ROA (from adjusted profit after tax)	2.7%	2.7%	0.0
Operating profit margin	3.39%	3.65%	0.26
Total income margin	5.99%	6.25%	0.27
Net interest margin	3.93%	4.27%	0.34
Net fee and commission margin	1.29%	1.31%	0.02
Net other non-interest income margin	0.77%	0.68%	(0.09)
Cost-to-asset ratio	2.59%	2.60%	0.01
Cost/income ratio	43.3%	41.6%	(1.7)
Provision for impairment on loan losses-to-average gross loans ratio	0.16%	0.34%	0.18
Total risk cost-to-asset ratio	0.10%	0.25%	0.15
Effective tax rate	17.5%	19.1%	1.6
Non-interest income/total income	34%	32%	(3)
EPS base (HUF) (from profit after tax)	3,695	4,052	10
EPS diluted (HUF) (from profit after tax)	3,693	4,050	10
EPS base (HUF) (from adjusted profit after tax)	3,769	4,330	15
EPS diluted (HUF) (from adjusted profit after tax)	3,767	4,328	15
Comprehensive Income Statement	**2023**	**2024**	**%**
Consolidated profit after tax	990,459	1,076,140	9
Fair value changes of financial instruments measured at fair value through other comprehensive income	78,419	47,751	(39)
Net investment hedge in foreign operations	(2,707)	(27,310)	909
Foreign currency translation difference	(200,928)	195,152	
Change of actuarial costs (IAS 19)	(400)	(923)	131
Net comprehensive income	**864,843**	**1,290,810**	**49**
o/w Net comprehensive income attributable to equity holders	863,714	1,286,097	49
Net comprehensive income attributable to non-controlling interest	1,129	4,713	317

Average exchange rate* of the HUF	2023 HUF	2024 HUF	Change %
HUF/EUR	382	395	3
HUF/CHF	393	415	6
HUF/USD	353	365	3

* Exchange rates presented in the tables of this report should be interpreted as follows: the value of a unit of the other currency expressed in Hungarian forint terms, i.e. HUF/EUR represents the HUF equivalent of one EUR.

ASSET-LIABILITY MANAGEMENT

Similar to previous periods OTP Group maintained a strong and safe liquidity position…

The primary objective of OTP Bank in terms of asset-liability management has not changed, that is to ensure that the Group's liquidity is maintained at a safe level.

Refinancing sources of the European Central Bank are available for OTP (ECB repo eligible securities portfolio on Group level exceeded EUR 8.9 billion).

Total liquidity reserves of OTP Bank remained steadily and substantially above the safety level. As at 31 December 2024 the gross liquidity buffer was around EUR 9.8 billion equivalent. The level of these buffers is significantly higher than the maturing debt within one year and the reserves required to manage possible liquidity shocks.

As at 31 December 2023 OTP Group's consolidated liquidity coverage (LCR) ratio was 270% (4Q 2022: 246%) while NSFR compliance has remained comfortable (4Q 2024: 151%).

In 2024, OTP Bank raised a total of EUR 1.88 billion in MREL funds from the international capital market, of which public senior preferred bond issuances accounted for EUR 1.8 billion. The difference between these two numbers was explained by a Chinese Yuan issuance equivalent of EUR 38 million and a bilateral loan of EUR 50 million. Additionally, the Bank redeemed MREL funds in the notional amount of EUR 0.9 billion, which included EUR 500 million in Tier2 capital instruments and EUR 400 million in senior preferred bonds. In the course

of 2024 the volume of bonds issued under the Bank's domestic bond program declined by almost HUF 100 billion.

OTP Mortgage Bank issued mortgage bonds with a total face value of HUF 190 billion, while HUF 271 billion matured during the year.

On the international capital market, OTP Bank Slovenia redeemed EUR 300 million Senior Preferred in January 2024, which was replaced by a EUR 300 million Senior Preferred bond issuance in April, furthermore, in October, it also redeemed a EUR 90.4 million Tier2 capital instrument, which was not refinanced. Ipoteka Bank executed a senior unsecured note issuance equivalent to USD 108 million in local currency, refinancing a senior unsecured note maturity equivalent to USD 64 million.

…and kept its interest-rate risk exposures low

Due to the liabilities which respond to yield changes only to a moderate extent, the Bank has an interest-rate risk exposure resulting from its business operations. The Bank considers the reduction and closing of this exposure as a strategic matter.

The stock of HUF denominated variable interest rate assets stabilized in 2024, as with the normalization of the yield environment, the balance sheet distorting effect of government interventions decreased somewhat recently. Overall, HUF interest rate risk position can be considered currently nearly closed. However, due to the upcoming maturities of the long-term HUF liquid asset portfolio and the operating profit accumulation, the amount of variable rate asset surplus is expected to increase as time passes.

In case of EUR and BGN denominated volumes the Group has variable rate asset surplus, thus an open interest rate risk position. The Group continued to purchase fixed rate EUR (and BGN) assets in 2024, furthermore entered into fixed interest rate receiver swap positions, in order to hedge the Group's net interest income from the negative effects of potential decrease in the EUR yields.

Market Risk Exposure of OTP Group

The consolidated capital requirement of the trading book positions, the counterparty risk and the FX risk exposure represented HUF 49.5 billion in total.

OTP Group is an active participant of the international FX and derivative market. Open FX positions of group members are restricted to individual and global net open position limits (overnight and intraday), and to stop-loss limits. The open positions of the group members outside Hungary except for the Bulgarian DSK Bank – the EUR/BGN exposure of DSK under the current exchange rate regime does not represent real risk – were negligible measured against either the balance sheet total or the regulatory capital. Therefore, the group level FX exposure was concentrated at OTP Bank.

In order to mitigate the FX rate sensitivity of the consolidated equity, OTP Bank Plc. has opened a short euro open FX position; the revaluation result of which is recognized directly against equity.

CONSOLIDATED STATEMENT OF FINANCIAL POSITION OF OTP GROUP

Main components of the adjusted balance sheet	2023 HUF million	2024 HUF million	Change %
TOTAL ASSETS	**39,609,144**	**43,419,128**	**10**
Cash, amounts due from Banks and balances with the National Banks	7,324,636	6,079,032	(17)
Placements with other banks, net of allowance for placement losses	1,575,145	1,891,901	20
Securities at fair value through profit or loss	290,975	744,104	156
Securities at fair value through other comprehensive income	1,640,891	1,705,554	4
Net customer loans	21,447,380	23,361,638	9
Net customer loans (FX-adjusted*)	22,549,534	23,361,638	4
Gross customer loans	22,466,415	24,334,694	8
Gross customer loans (FX-adjusted*)	23,610,743	24,334,694	3
Gross performing (Stage 1+2) customer loans (FX-adjusted*)	**22,596,102**	**23,447,715**	**4**
o/w Retail loans	12,169,212	13,479,550	11
Retail mortgage loans (incl. home equity)	6,107,945	6,496,939	6
Retail consumer loans	5,034,799	6,070,193	21
SME loans	1,026,467	912,418	(11)
Corporate loans	8,914,511	8,321,927	(7)
Leasing	1,512,379	1,646,237	9
Allowances for loan losses	(1,019,035)	(973,056)	(5)
Allowances for loan losses (FX-adjusted*)	(1,061,208)	(973,056)	(8)
Associates and other investments	96,346	124,524	29
Securities at amortized costs	5,475,701	7,447,741	36
Tangible and intangible assets, net	878,949	985,886	12
o/w Goodwill, net	66,932	71,308	7
Tangible and other intangible assets, net	812,017	914,578	13
Other assets	879,121	1,078,749	23
TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	**39,609,144**	**43,419,128**	**10**
Amounts due to banks, the National Governments, deposits from the National Banks and other banks, and Financial liabilities designated at fair value through profit or loss	2,013,333	2,094,681	4
Deposits from customers	29,428,284	31,666,399	8
Deposits from customers (FX-adjusted*)	**30,937,627**	**31,666,399**	**2**
o/w Retail deposits	20,392,811	21,415,108	5
Household deposits	17,013,471	18,002,762	6
SME deposits	3,379,340	3,412,347	1
Corporate deposits	10,544,816	10,251,290	(3)
Accrued interest payable related to customer deposits	0	0	
Liabilities from issued securities	2,095,548	2,593,124	24
o/w Retail bonds	201,131	85,401	(58)
Liabilities from issued securities without retail bonds	1,894,418	2,507,723	32
Other liabilities	1,414,790	1,575,553	11
Subordinated bonds and loans	562,396	369,359	(34)
Total shareholders' equity	**4,094,793**	**5,120,012**	**25**

Indicators	2023	2024	%/pps
Loan/deposit ratio	76%	77%	1
Loan/deposit ratio (FX-adjusted1)	76%	77%	1
Net loan/deposit ratio (FX-adjusted)	73%	74%	1
Stage 1 loan volume under IFRS 9	18,570,222	20,279,860	9
Stage 1 loans under IFRS 9/gross customer loans	82.7%	83.3%	0.7
Own coverage of Stage 1 loans under IFRS 9	0.9%	0.8%	(0.1)
Stage 2 loan volume under IFRS 9	2,926,312	3,167,854	8
Stage 2 loans under IFRS 9/gross customer loans	13.0%	13.0%	0.0
Own coverage of Stage 2 loans under IFRS 9	9.2%	9.2%	0.1
Stage 3 loan volume under IFRS 9	969,881	886,981	(9)
Stage 3 loans under IFRS 9/gross customer loans	4.3%	3.6%	(0.7)
Own coverage of Stage 3 loans under IFRS 9	60.8%	59.5%	(1.3)

* For the FX-adjustment, the closing cross currency rates for the current period were used in order to calculate the HUF equivalent of loan and deposit volumes in the base periods.

Consolidated capital adequacy – Basel3, IFRS, according to prudential scope of consolidation	2023	2024	%/pps
Capital adequacy ratio	18.9%	20.3%	1.4
Tier 1 ratio	16.6%	18.9%	2.3
Common Equity Tier1 ('CET1') capital ratio	16.6%	18.9%	2.3
Own funds	4,475,380	5,200,375	16
o/w Tier1 Capital	3,945,570	4,842,978	23
o/w Common Equity Tier1 capital	3,945,570	4,842,978	23
Tier2 Capital	529,810	357,397	(33)
Consolidated risk weighted assets (RWA) (Credit&Market&Operational risk)	23,700,282	25,576,776	8
o/w RWA – Credit risk RWA	21,275,002	22,988,686	8
RWA – Market & Operational risk	2,425,281	2,588,090	7

Closing exchange rate of the HUF	2023 HUF	2024 HUF	Change %
HUF/EUR	383	410	7
HUF/CHF	412	435	6
HUF/USD	346	394	14

OTP BANK'S HUNGARIAN CORE BUSINESS

Starting from the first quarter of 2024, Bajor-Polár Center Real Estate Management Ltd., CIL Babér Ltd., BANK CENTER No. 1. Investment and Development Ltd., and MFM Project Investment and Development Ltd. were included into OTP Core. Previously, these companies were presented in the Other Hungarian Subsidiaries segment, but their main business activity is letting property to OTP Bank. In 4Q 2024, MFM Project Investment and Development Ltd. and Bajor-Polár Center Real Estate Management Ltd. merged into BANK CENTER No. 1. Investment and Development Ltd. At the same time OTP Facility Management Ltd., which was already part of OTP Core before 2024, merged into CIL Babér Ltd.

OTP Core Statement of recognized income:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	500,869	806,827	61
Dividend received from subsidiaries	187,726	424,380	126
Profit after tax without received dividend	313,143	382,447	22
Adjustments (without dividend received from subsidiaries, after tax)	79,272	112,060	41
Adjusted profit after tax	233,871	270,387	16
Profit before tax	359,862	374,636	4
Operating profit	360,944	425,303	18
Total income	774,869	868,382	12
Net interest income	432,651	578,001	34
Net fees and commissions	197,341	219,505	11
Other net non-interest income	144,877	70,876	(51)
Operating expenses	(413,925)	(443,078)	7
Total risk costs	(1,082)	(50,667)	
Provision for impairment on loan losses	(11,164)	(994)	(91)
Other provisions	10,083	(49,673)	
Corporate income tax	(125,991)	(104,250)	(17)

Indicators	2023	2024	pps
ROE (adjusted)	11.0%	9.6%	(1.4)
ROA (adjusted)	1.2%	1.3%	0.1
Operating profit margin	1.89%	2.12%	0.23
Total income margin	4.06%	4.32%	0.27
Net interest margin	2.26%	2.88%	0.61
Net fee and commission margin	1.03%	1.09%	0.06
Net other non-interest income margin	0.76%	0.35%	(0.41)
Operating costs to total assets ratio	2.2%	2.2%	0.0
Cost/income ratio	53.4%	51.0%	(2.4)
Provision for impairment on loan losses/average gross loans*	0.17%	0.01%	(0.16)
Effective tax rate	35.0%	27.8%	(7.2)

* Negative *Provision for impairment on loan and placement losses/average gross loans* ratio implies positive amount on the Provision for impairment on loan and placement losses line.

Main components of OTP Core's Statement of financial position:

Main components of balance sheet (closing balances)	2023 HUF million	2024 HUF million	Change %
Total Assets	18,459,423	19,288,046	4
Financial assets* (net)	9,630,766	9,813,107	2
Net customer loans	6,329,293	6,812,154	8
Net customer loans (FX-adjusted)	6,429,314	6,812,154	6
Gross customer loans	6,597,968	7,077,532	7
Gross customer loans (FX-adjusted)	6,700,811	7,077,532	6
Stage 1+2 customer loans (FX-adjusted)	**6,436,152**	**6,801,393**	**6**
Retail loans	3,752,741	4,127,150	10
Retail mortgage loans (incl. home equity)	1,722,831	1,939,281	13
Retail consumer loans	1,515,044	1,667,716	10
SME loans	514,865	520,154	1
Corporate loans	2,683,411	2,674,243	0
Provisions	(268,675)	(265,378)	(1)
Provisions (FX-adjusted)	(271,497)	(265,378)	(2)
Tangible and intangible assets (net)	296,425	403,473	36
Shares and equity investments (net)	1,890,681	1,995,219	6
Other assets (net)	312,258	264,094	(15)
Deposits from customers	10,780,256	10,913,995	1
Deposits from customers (FX-adjusted)	**11,015,593**	**10,913,995**	**(1)**
Retail deposits	6,264,408	6,794,456	8
Household deposits	4,831,762	5,311,198	10
SME deposits	1,432,646	1,483,258	4
Corporate deposits	4,751,185	4,119,506	(13)
Liabilities to credit institutions	2,326,311	1,903,955	(18)
Issued securities	1,877,094	2,397,615	28
o/w Retail bonds	*201,131*	*92,692*	*(54)*
Subordinated bonds and loans	507,277	347,117	(32)
Total shareholders' equity	2,371,964	3,053,832	29
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	5,312,525	5,799,286	9
Stage 1 loans under IFRS 9/gross customer loans	80.5%	81.9%	1.4
Own coverage of Stage 1 loans under IFRS 9	0.8%	0.5%	(0.3)
Stage 2 loan volume under IFRS 9 (in HUF million)	1,023,157	1,002,107	(2)
Stage 2 loans under IFRS 9/gross customer loans	15.5%	14.2%	(1.3)
Own coverage of Stage 2 loans under IFRS 9	7.8%	7.3%	(0.5)
Stage 3 loan volume under IFRS 9 (in HUF million)	262,285	276,139	5
Stage 3 loans under IFRS 9/gross customer loans	4.0%	3.9%	(0.1)
Own coverage of Stage 3 loans under IFRS 9	55.9%	58.2%	2.4
Market Share	**2023**	**2024**	**pps**
Loans	26.2%	26.6%	0.4
Deposits	28.3%	27.1%	(1.2)
Total Assets	28.2%	28.1%	(0.1)
Performance Indicators	**2023**	**2024**	**pps**
Net loans to deposits (FX-adjusted)	58%	62%	4
Leverage (closing Shareholder's Equity/Total Assets)	12.8%	15.8%	3.0
Leverage (closing Total Assets/Shareholder's Equity)	7.8x	6.3x	(1.5x)
Capital adequacy ratio (OTP Bank, non-consolidated, Basel3, IFRS)	27.6%	29.3%	1.7
Common Equity Tier 1 ratio (OTP Bank, non-consolidated, Basel3, IFRS)	22.5%	25.8%	3.3

In 2024, **OTP Core** generated HUF 806 billion profit after tax, including HUF 424 billion dividends received from subsidiaries.
During the year, items worth HUF 112 billion were presented amongst the adjustments at OTP Core, fully related to revaluation effect of the merger of the two Slovenian subsidiaries at the end of August, and not appearing at Group level. This item arose because a subsidiary directly owned by OTP Bank was merged into another company that was indirectly owned by the Bank. The amount presented as adjustment item was the result of the revaluation of SKB Banka to market value.
In 2024, OTP Core generated HUF 270 billion profit after tax without dividends from subsidiaries, 15% more than the HUF 234 billion profit in the base period. The improvement was strongly supported by net interest income, which surged by a third y-o-y from a low base. On the other hand, risk costs grew mainly as a result of increasing provision coverage rate

* Cash, amounts due from banks and balances with the National Bank of Hungary; placements with other banks; repo receivables; securities and other financial assets..

on the Russian bonds in the Bank's balance sheet, and other income halved, owing to the drop in the fair value adjustment of the subsidized housing (CSOK) and baby loans. The full-year amount of the special tax on financial institutions and the windfall tax, presented on the corporate tax line, totalled gross HUF 42.6 billion, and was accounted for in a lump sum in the first quarter. OTP Bank took the possibility of reducing the windfall tax by increasing the stock of Hungarian government bonds, as stipulated by the relevant regulation. In July 2024, the conditions for tax reduction were tightened; yet OTP Core realized HUF 5.9 billion reduction from the initial HUF 12.4 billion windfall tax payment obligation in 2024.

The adjusted profit before tax grew by 4% y-o-y. In 2024, operating profit improved by 18%, mainly as a result of the 34% jump in net interest income. This was to a great extent due to the improvement in net interest margin which hit rock bottom amid extremely high interest rate environment in the first half of 2023, then started to improve from the second half of 2023 after interest rate cuts began. The margin was also boosted by the turnaround in retail deposits: their declining trend that lasted until the end of 2023 broke in 4Q 2023, and the stock has been steadily expanding since then. Annual net interest margin rose by 61 bps, to 2.88%.

Full-year net fees and commissions rose by 11% y-o-y, mainly supported by stronger income from fees on deposits, transactions, and securities commissions. Meanwhile, the financial transaction tax paid by the Bank grew by 25%, or HUF 25 billion, as a result of an increase in the transaction tax rates from 1 August 2024 and the introduction of the new FX conversion tax on 1 October.

In 2024, other income halved y-o-y. The main reason behind the HUF 74 billion drop was that the HUF 25.8 billion positive revaluation result of the subsidized CSOK and baby loans in 2024 was HUF 61.5 billion lower than in the previous year.

Annual operating expenses were 7% higher than a year earlier: the jump in amortization caused by IT investments was counterbalanced by moderately increasing personnel cost and other expenses growing at inflation rate. The latter was influenced by the y-o-y decline in supervisory charges, which fully offset the increase in IT and other costs. The annual cost/income ratio improved by 2.4 pps to 51%.

In 2024, total risk cost amounted to HUF 51 billion; of that, loan loss provisions made up HUF 1 billion, and other risk costs totalled HUF 50 billion. In case of credit risk costs, releases induced by the revision of risk parameters, as well as recoveries realized from receivables managed by OTP Factoring counterbalanced the HUF 10.4 billion provisioning triggered by the extension of the interest rate cap. Other risk cost was largely shaped by the HUF 38 billion impairment on the Bank's Russian government bond portfolio, and the revaluation of investments in 2Q.

Loan quality trends were favourable in 2024. In y-o-y comparison, the ratio of both Stage 3 (–0.1 pp) and Stage 2 (–1.3 pps) loans declined, in which the positive development in household loan quality played an eminent role. The drop in the Stage 3 ratio was supported by the sale of non-performing loans in 4Q. The coverage of Stage 3 loans improved by 2.4 pps y-o-y, to 58.2%.

Issued securities and total shareholders' equity (via the inclusion of full-year profit) generated 4% y-o-y growth in total liabilities and shareholders' equity. On the asset side this materialized in the increase in performing loans and financial assets.

The volume of performing (Stage 1+2) loans grew by 6% in 2024 (FX-adjusted), thanks to the strengthening demand for retail loans. In the retail segment, performing mortgage loans' y-o-y growth rate accelerated to 13%. In 2024, 31% of customers decided to sign housing loan contract with OTP Bank; thereby, the amount of new housing loan contracts for both market-based and subsidized loans more than doubled y-o-y, in line with the market's growth. The voluntary interest rate cap on newly placed housing loans, applied by major banks in the first half of the year, expired on 30 June, but this only slightly reduced applications for housing loans in the second half of the year: after the decline in 3Q, the volume of loan applications picked up again in 4Q.

In 2024, the volume of CSOK subsidized housing loans applications amounted to HUF 126 billion. Thus the CSOK Plus loans, which have been available since 2024, made up more than 80% of the HUF 157 billion subsidized loan contracts signed in 2024.

Consumer loan volumes rose by 10% in 2024. The 15% y-o-y expansion in cash loans was the key driver of growth, in 2024 new cash loan disbursements surpassed that of the preceding year by more than 65%, exceeding the market dynamics. Baby loan disbursements were flat y-o-y, thus the stock grew by 7% y-o-y.

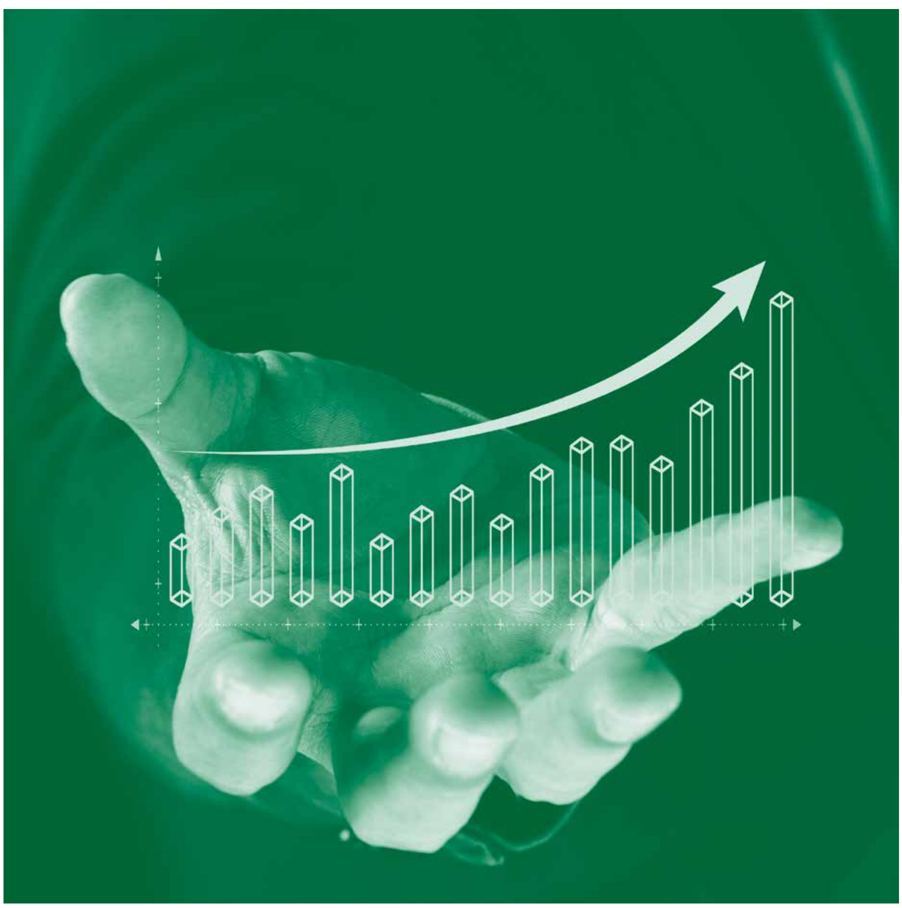
Corporate + MSE volumes stagnated y-o-y, affected by the repayment of a big ticket corporate loan in 3Q. Without that effect, the y-o-y growth would have been 5%.

OTP Bank's market share in loans to non-financial corporations rose by 0.3 pp, to 19.5% since the end of 2023. The Széchenyi Card MAX+ loan programme generated HUF 370 billion new placement in 2024, resulting in 44% flow market share. Of the HUF 200 billion additional envelope of the Baross Gábor loan programme available from 2024 (exhausted in February 2024), Eximbank approved HUF 33 billion worth of deals for OTP Bank.

The FX-adjusted stock of deposits from customers was stable y-o-y. In a favourable development, household deposits grew by 10% y-o-y, supported by an increase in current account volumes as well by the 'Persely' (Piggy Bank) feature launched at the end of 2023.

There was an outflow from corporate + MSE deposits at the end of the year, accordingly, the closing stock contracted by 9% compared to the end of 2023, but the annual average stock deposits from companies remained stable.

As a result of the Bank's active presence on capital markets, the volume of issued securities (without retail bonds) surged by 38% y-o-y.



At the end of 2024 the volume of retail bonds reached HUF 85 billion. In 2024, a total amount of EUR 1.8 billion international public bond issuances and a private placement of CNY 300 million were carried out; all bonds were MREL-eligible securities. The annual portfolio dynamics were significantly influenced by the fact that the Bank exercised the call option for two previously issued securities in July 2024, totalling EUR 900 million (of which EUR 500 million were Tier2 bonds presented under subordinated bonds and loans). In the course of 2024 the volume of bonds issued under the Bank's domestic bond program declined by almost HUF 100 billion.

OTP Mortgage Bank issued mortgage bonds with a total face value of HUF 190 billion, while HUF 271 billion matured during the year.

Recently the following relevant **regulatory changes** were announced in Hungary:

- **Windfall tax:**
  - Government decree No. 206/2023 (V. 31.) published on 31 May 2023 outlined the details of the extra profit tax payable by credit institutions in 2024. The basis of the tax is the 2022 profit before tax adjusted for several items. The tax rate is 13% for the part of the tax base not exceeding HUF 20 billion, and 30% for the amount above that. According to the decree, if the average amount of Hungarian government bonds owned by the financial institution increases over a certain period, the windfall tax payable by the credit institution can be reduced. The reduction cannot be more than 10% of the increase in government bond holdings and cannot exceed 50% of the windfall tax payment obligation calculated without the reduction.
  - The ruling was amended according to Government Decree No. 183/2024. (VII. 8.) as the windfall tax burden in 2024 can be reduced in proportion to the growth of government bonds maturing after 2027 only if the total volume of government bonds increases at least with the same amount. The reduction can be up to 10% of the growth in the notional of government bonds, but not more than 50% of the windfall tax payment obligation.
  - In 2024 the gross amount of the windfall tax was HUF 13 billion in the case of the Hungarian Group members, from which the increase in government bond holdings allowed for HUF 6.2 billion reduction, resulting in HUF 6.8 billion windfall tax burden.
  - According to Government Decree No. 356/2024 (XI. 21.) published on 21 November 2024, in 2025 the windfall profit tax burden payable by OTP Group's Hungarian group members might be around HUF 53 billion (before corporate income tax), assuming the full utilization of the reduction opportunity related to the increase in the stock of government securities.
- **Interest rate cap:**
  - Pursuant to Government Decree No. 522/2023. (XI. 30.):
    - The interest rate cap for the outstanding volume of certain residential mortgage loans was extended by six months, until 30 June 2024.
    - The rate cap for the existing volume of certain MSE loans was extended until 1 April 2024, and it was terminated that after.
  - On 20 June 2024, Government Decree No. 130/2024 (VI.20) enacted the extension of the interest rate cap on certain housing loans, until 31 December 2024.
  - On 2 December 2024, Government Decree No. 374/2024 (XII.2) enacted the extension of the interest rate cap on certain housing loans, until 30 June 2025.
- **Voluntary interest rate cap on newly granted loans:**
  - At the beginning of October 2023, the Ministry of Economic Development proposed that banks impose voluntary interest rate caps on newly granted HUF-denominated working capital loans for businesses, and on residential housing loans. The voluntary interest rate cap expired on 30 June 2024. OTP Bank participated in the initiative.

  - Between 1 April and 31 October 2025, as part of the government's 'New Economic Policy Action Plan', based on the individual decision of the participating banks, 5% interest rate cap will be available for under 35 years old, first-time home buyers for newly granted green housing loans, with properties under 60 square meter and price lower than HUF 1.2 million per square meter. The rate cap will be applied in the first 5 years of the loan, and the product will be free of disbursement and credit assessment fees.
- **Family support schemes and economic stimulus measures:**
  - The government extended childbirth pledge deadline until 1 July 2026, for all baby loan borrowers whose deadline was or will be between 1 July 2024 and 30 June 2026, based on Government Decree No. 190/2024. (VII. 8.).
    The government decrees of 388/2024 (XII. 11.) and 437/2024 (XII. 23.) have amended the terms and conditions for the subsidized baby loan so the interest-free feature of the loan may be regained in certain cases and the eligibility age limit for wives increased from 30 the 35 years.
  - On 5 April 2024, the government announced a new subsidized home renovation loan programme, which began on 1 July 2024. The loan, with maximum amount of HUF 7 million and up to 12 years term, is available in OTP Bank's branches that function as 'MFB points', for the purpose of energy efficiency improvement of family houses built before 1990.
  - From 1 November 2024, the client interest rate of Széchenyi Card Programme's investment loan products for Hungarian micro, small and medium-sized enterprises was lowered to fixed 3.5%, from the previous 5%.
- **Capital regulation:**
  - On 20 June 2024, the National Bank of Hungary raised the countercyclical capital buffer rate to 1%, effective from 1 July 2025. In its meeting of 27 June 2024, the central bank left the systemic risk capital buffer unchanged at 0%.
  - MREL minimum requirement: effective from 1 January 2025, the National Bank of Hungary imposed the below additional capital requirements for OTP Group, on consolidated level:
    - 1.01%-points in case of the Common Equity Tier1 (CET1) capital, accordingly the minimum requirement for the consolidated CET1 ratio is 5.51% (without regulatory capital buffers);
    - 1.34%-points in case of the Tier1 capital, accordingly the minimum requirement for the consolidated Tier 1 ratio is 7.34% (without regulatory capital buffers);
    - 1.79%-points in case of the Total SREP Capital Requirement (TSCR), accordingly the minimum requirement for the consolidated capital adequacy ratio is 9.79% (without regulatory capital buffers).
- In government decision 1311/2024. (X. 21.), Hungary's government announced the 21-step 'New Economic Policy Action Plan', the elements of which, launched after 1 January 2025, are detailed in the Post-balance sheet events section.

OTP FUND MANAGEMENT (HUNGARY)

Changes in assets under management and financial performance of OTP Fund Management:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	19,673	24,624	25
Adjustments (after tax)	0	0	
Adjusted profit after tax	19,673	24,624	25
Income tax	(2,491)	(2,578)	3
Profit before income tax	22,165	27,202	23
Operating profit	22,193	27,138	22
Total income	27,771	32,753	18
Net fees and commissions	25,923	30,321	17
Other net non-interest income	1,846	2,389	29
Operating expenses	(5,578)	(5,615)	1
Total provisions	(28)	64	
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	39,461	43,750	11
Total shareholders' equity	28,741	29,409	2
Asset under management	**2023 HUF billion**	**2024 HUF billion**	**Change %**
Assets under management, total (w/o duplicates)*	**3,086**	**4,071**	**32**
Volume of investment funds (closing, w/o duplicates)	2,609	3,507	34
Volume of managed assets (closing)	477	563	18
Volume of investment funds (closing, with duplicates)**	**3,532**	**4,648**	**32**
bond	1,924	2,556	33
mixed	336	637	90
absolute return	370	507	37
equity	331	499	51
money market	484	340	(30)
commodity market	70	91	29
guaranteed	17	19	12

In 2024, **OTP Fund Management** generated HUF 24.6 billion profit, thus increasing its annual profit by 25% y-o-y.

Annual net fee and commission income increased by 17%, driven by the growth of assets under management. The average annual rate of the fund management fee (1.11% in 2024) was 15 bps lower than last year.

In 2024, other income jumped by 29%, owing to the gain on securities at fair value in the Company's own books.

Operating expenses for the full year were 1% higher than in the previous year. The 13% increase in other expenses largely stemmed from higher expert fees and rising IT costs, while the change in personnel expenses was mitigated by a decrease in bonus payments.

In the Hungarian fund management market, the uptrend in investment funds assets continued. On top of attractive returns and price fluctuations, positive capital inflows also contributed to asset growth. Despite varying degrees of outflows in different categories, on balance, the inflow of capital exceeded outflow. Regarding individual asset categories, bond funds retained their leading position, but the assets of real estate funds, which ranked second in the previous year, barely rose in 2024, and it was overtaken by mixed funds and absolute return funds.

In the case of OTP Fund Management, the asset of bond funds grew by 33% y-o-y, surpassing HUF 2,500 billion, thus it made up more than half of managed funds' volumes at the end of the year. Among the other categories, mixed funds, which is currently the second largest category, skyrocketed (+90% y-o-y), and absolute return funds also marched higher (+37% y-o-y), benefiting from the effect of positive returns and capital inflows, while money market funds experienced capital outflows.

Overall, the volume of funds managed by OTP Fund Management exceeded HUF 4,600 billion (+32% y-o-y) at the end of December; maintaining its position as the market leader with 31.5% market share in the securities market.

* The cumulative net asset value of investment funds and managed assets of OTP Fund Management, eliminating the volume of own investment funds (duplications) being managed in other investment funds and managed assets of OTP Fund Management.
** The cumulative net asset value of investment funds with duplications managed by OTP Fund Management.

Performance of Merkantil Group:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	6,647	10,842	63
Adjustments (after tax)	0	0	0
Adjusted profit after tax	6,647	10,842	63
Income tax	(3,860)	(3,728)	(3)
Profit before income tax	10,507	14,569	39
Operating profit	14,967	12,098	(19)
Total income	28,013	27,541	(2)
Net interest income	26,257	24,052	(8)
Net fees and commissions	759	669	(12)
Other net non-interest income	997	2,819	183
Operating expenses	(13,046)	(15,443)	18
Total provisions	(4,461)	2,471	
Provision for impairment on loan losses	(4,438)	2,494	
Other provision	(22)	(23)	1
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	930,761	1,009,625	8
Gross customer loans	590,510	674,058	14
Gross customer loans (FX-adjusted)	594,598	674,058	13
Stage 1+2 customer loans (FX-adjusted)	580,219	660,816	14
Corporate loans	58,066	57,654	(1)
Leasing	522,153	603,162	16
Allowances for possible loan losses	(13,637)	(9,896)	(27)
Allowances for possible loan losses (FX-adjusted)	(13,149)	(9,896)	(25)
Deposits from customers	5,028	5,884	17
Corporate deposits	2,261	3,437	52
Liabilities to credit institutions	839,730	900,713	7
Subordinated debt	5,003	6,031	21
Total shareholders' equity	61,237	66,604	9
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	533,569	612,507	15
Stage 1 loans under IFRS 9/gross customer loans	90.4%	90.9%	0.5
Own coverage of Stage 1 loans under IFRS 9	0.8%	0.4%	(0.4)
Stage 2 loan volume under IFRS 9 (in HUF million)	42,648	48,309	13
Stage 2 loans under IFRS 9/gross customer loans	7.2%	7.2%	(0.1)
Own coverage of Stage 2 loans under IFRS 9	7.0%	4.5%	(2.4)
Stage 3 loan volume under IFRS 9 (in HUF million)	14,293	13,241	(7)
Stage 3 loans under IFRS 9/gross customer loans	2.4%	2.0%	(0.5)
Own coverage of Stage 3 loans under IFRS 9	44.1%	40.2%	(3.9)
Provision for impairment on loan losses/average gross loans	0.80%	(0.40%)	(1.19)
Performance Indicators	**2023**	**2024**	**pps**
ROA	0.7%	1.1%	0.4
ROE	11.2%	17.9%	6.7
Total income margin	3.00%	2.87%	(0.13)
Net interest margin	2.81%	2.51%	(0.30)
Operating costs/Average assets	1.4%	1.6%	0.2
Cost/income ratio	46.6%	56.1%	9.5

In 2024, **Merkantil Group** posted HUF 11 billion adjusted profit after tax (+63% y-o-y), which brought its full-year ROE to 17.9%.

Operating profit shrank by 19%, as a result of stagnating total income caused by narrowing net interest margins as well as operating expenses expanding by 18%. Net interest income declined by 8% y-o-y as income from vehicle rental was retroactively reclassified from interest income to other income in 3Q, for the full year. This reclassification reduced annual net interest income by a total of HUF 1.2 billion. Without the effect of this reclassification, net interest income dropped by 4% y-o-y as net interest margin narrowed. This shifting caused most of the increase in other income.

The 18% y-o-y increase in operating expenses stemmed from the growing personnel expenses, deductible taxes (under other expenses), as well as from higher IT and real estate related costs.

The total risk costs line printed HUF 2.5 billion positive amount in full year 2024. The ratio of Stage 3 loans sank by 0.5 pp y-o-y, to 2%. The coverage of Stage 3 loans dropped by 3.9 pps y-o-y, and that of Stage 2 loans declined by 2.4 pps.

FX-adjusted performing (Stage 1+2) loans grew by 14% y-o-y, including a 16% expansion in leasing exposures, while corporate loans fell by 1%.

Credit demand benefited from the state subsidized loan facilities: under the KAVOSZ Széchenyi Card programme, customers concluded subsidized loan agreements totalling HUF 168 billion (including HUF 84 billion in 2022, HUF 43 billion in 2023, and HUF 41 billion in 2024) with Merkantil Bank, since the beginning of the scheme. Contracted amount under the Baross Gábor loan programme reached HUF 20 billion in 2024.

IFRS Reports of the main foreign subsidiaries of OTP Bank

DSK GROUP (BULGARIA)

Performance of DSK Group:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	198,182	200,765	1
Adjustments (after tax)	0	0	
Adjusted profit after tax	198,182	200,765	1
Income tax	(21,303)	(33,392)	57
Profit before income tax	219,485	234,156	7
Operating profit	216,102	255,204	18
Total income	316,105	375,365	19
Net interest income	226,693	267,411	18
Net fees and commissions	72,366	83,724	16
Other net non-interest income	17,046	24,230	42
Operating expenses	(100,003)	(120,160)	20
Total provisions	3,383	(21,048)	
Provision for impairment on loan losses	2,779	(18,015)	
Other provision	604	(3,033)	
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	6,456,668	7,674,660	19
Gross customer loans	4,066,527	4,809,808	18
Gross customer loans (FX-adjusted)	4,357,292	4,809,808	10
Stage 1+2 customer loans (FX-adjusted)	4,254,297	4,707,396	11
Retail loans	2,408,789	2,959,593	23
Retail mortgage loans	1,237,703	1,582,839	28
Retail consumer loans	1,076,790	1,276,758	19
MSE loans	94,295	99,996	6
Corporate loans	1,517,313	1,378,332	(9)
Leasing	328,195	369,470	13
Allowances for possible loan losses	(125,806)	(142,807)	14
Allowances for possible loan losses (FX-adjusted)	(134,812)	(142,807)	6
Deposits from customers	5,165,700	6,132,661	19
Deposits from customers (FX-adjusted)	5,550,547	6,132,661	10
Retail deposits	4,664,369	5,250,443	13
Retail deposits	4,161,467	4,706,002	13
MSE deposits	502,902	544,442	8
Corporate deposits	886,178	882,219	0
Liabilities to credit institutions	249,178	318,710	28
Subordinated debt	88,087	94,318	7
Total shareholders' equity	890,188	1,051,427	18
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	3,483,290	4,087,398	17
Stage 1 loans under IFRS 9/gross customer loans	85.7%	85.0%	(0.7)
Own coverage of Stage 1 loans under IFRS 9	0.7%	0.5%	(0.2)
Stage 2 loan volume under IFRS 9 (in HUF million)	487,099	619,996	27
Stage 2 loans under IFRS 9/gross customer loans	12.0%	12.9%	0.9
Own coverage of Stage 2 loans under IFRS 9	9.3%	10.0%	0.6
Stage 3 loan volume under IFRS 9 (in HUF million)	96,137	102,413	7
Stage 3 loans under IFRS 9/gross customer loans	2.4%	2.1%	(0.2)
Own coverage of Stage 3 loans under IFRS 9	57.1%	58.0%	0.9
Provision for impairment on loan losses/average gross loans	(0.07%)	0.40%	0.47
Performance Indicators	**2023**	**2024**	**pps**
ROA	3.3%	2.9%	(0.4)
ROE	24.9%	21.5%	(3.4)
Total income margin	5.24%	5.33%	0.09
Net interest margin	3.76%	3.80%	0.04
Operating costs/Average assets	1.7%	1.7%	0.0
Cost/income ratio	31.6%	32.0%	0.4
Net loans to deposits (FX-adjusted)	76%	76%	0

FX rates	2023 HUF	2024 HUF	Change %
HUF/BGN (closing)	195.7	209.7	7
HUF/BGN (average)	195.4	201.6	3

In 2024, **DSK Group** generated HUF 200.8 billion profit after tax, 1% more than in the previous year, the ROE was 21.5%.

Annual operating profit improved by 18%, mainly as a result of strong volume growth, which was offset by a higher risk costs and by the introduction of the global minimum tax regime on 1 January 2024. As a result, the effective corporate tax rate increased from 10% in 2023 to 14% in 2024, and the amount of tax grew by 57% y-o-y.

The full-year profit before tax improved by 7%, mainly driven by a 18% surge in net interest income, in line with the growth in total assets. Net interest margin was y-o-y stable, but its quarterly level has gradually declined by altogether 27 bps since the peak hit in 3Q 2023, reflecting ECB base rate cuts.

In 2024, the Bank steadily increased the share of long-term fixed-interest-rate bonds within the liquid asset portfolio. As the interest rate on these bonds is lower than that on short-term placements, this entailed a margin sacrifice in the short run. Net interest income was negatively affected by the increase in the mandatory reserve requirement rate from 10% to 12% in July 2023, as the central bank does not pay interest on that stock.

Net fees and commissions grew by 16% y-o-y, mainly as a result of the increase in retail volumes and transactional turnover. Other income expanded by 42%, partly as a result of a y-o-y increase in currency conversion gains, as well as the refunds from card companies in the fourth quarter.

Throughout the year, cost level was under significant pressure from wage inflation and IT developments. As a result, annual operating expenses grew by 20% (by 16% in BGN), the cost/income ratio was 32.0%, which remained one of the lowest ones among Group members.

In 2024, total risk cost amounted to –HUF 21.0 billion, of which credit risk costs made up –HUF 18.0 billion, bringing the credit risk cost ratio to 40 bps. On the other risk cost line, HUF 7.5 billion impairment was set aside for the Russian government bonds held in the Bank's balance sheet; this effect was partially offset by releases on other securities and on litigations. The coverage of Russian bonds was 78% at the end of the year.

Underlying loan quality trends remained stable: the Stage 3 ratio declined by 0.2 pp, to 2.1% y-o-y, while Stage 3 loans' own provision coverage improved by 0.9 pp, to 58%.

Performing (Stage 1+2) loans surged by 11% y-o-y (FX-adjusted), propelled by the 24% y-o-y expansion in household loan volumes. New mortgage loan placements jumped by 39%, and cash loan disbursements grew by 21% y-o-y. In response to the strong (even at sector level) household loan flow, the central bank tightened macroprudential brakes for retail loans, effective from 1 October 2024: in the case of the newly contracted loans, the loan-to value (LTV) ratio was capped at 85%, the down payment shall be at least 10%, and the debt service-to-income ratio (DSTI) shall not exceed 50%. Corporate (including MSE) loans fell by 8% y-o-y, partly because of the repayment of a larger loan affecting several Group members, as well as the transfer of another larger loan to OTP Bank Serbia in 3Q; without them, corporate + MSE loans would have expanded by 1% y-o-y. The leasing exposure of the Bulgarian operation grew by 14% y-o-y (FX-adjusted).

Deposits increased by 10% y-o-y (FX-adjusted), driven by retail deposits' growth. The stock of corporate deposits was y-o-y stable.

The net loan/deposit ratio was 76% at the end of December.

Performance of OTP Bank Slovenia:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	100,958	113,282	12
Adjustments (after tax)	(11,385)	0	
Adjusted profit after tax	112,342	113,282	1
Income tax	(7,226)	(24,288)	236
Profit before income tax	119,568	137,570	15
Operating profit	131,630	145,858	11
Total income	218,870	251,993	15
Net interest income	167,121	190,303	14
Net fees and commissions	46,028	53,756	17
Other net non-interest income	5,721	7,934	39
Operating expenses	(87,240)	(106,135)	22
Total provisions	(12,061)	(8,288)	(31)
Provision for impairment on loan losses	(2,485)	(8,640)	248
Other provision	(9,576)	352	
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	5,892,803	6,106,968	4
Gross customer loans	2,796,313	2,908,790	4
Gross customer loans (FX-adjusted)	2,995,714	2,908,790	(3)
Stage 1+2 customer loans (FX-adjusted)	2,948,302	2,850,235	(3)
Retail loans	1,438,068	1,477,751	3
Retail mortgage loans	951,101	951,490	0
Retail consumer loans	431,197	473,435	10
MSE loans	55,770	52,826	(5)
Corporate loans	1,308,023	1,154,562	(12)
Leasing	202,211	217,922	8
Allowances for possible loan losses	(33,587)	(53,030)	58
Allowances for possible loan losses (FX-adjusted)	(35,983)	(53,030)	47
Deposits from customers	4,583,072	4,774,165	4
Deposits from customers (FX-adjusted)	4,913,369	4,774,165	(3)
Retail deposits	3,837,698	3,827,532	0
Retail deposits	3,332,073	3,330,558	0
MSE deposits	505,625	496,974	(2)
Corporate deposits	1,075,671	946,633	(12)
Liabilities to credit institutions	131,375	58,588	(55)
Issued securities	335,400	368,829	10
Subordinated debt	63,167	32,818	(48)
Total shareholders' equity	669,622	777,525	16
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	2,514,261	2,426,800	(3)
Stage 1 loans under IFRS 9/gross customer loans	89.9%	83.4%	(6.5)
Own coverage of Stage 1 loans under IFRS 9	0.3%	0.2%	0.0
Stage 2 loan volume under IFRS 9 (in HUF million)	237,794	423,434	78
Stage 2 loans under IFRS 9/gross customer loans	8.5%	14.6%	6.1
Own coverage of Stage 2 loans under IFRS 9	3.4%	4.7%	1.3
Stage 3 loan volume under IFRS 9 (in HUF million)	44,258	58,555	32
Stage 3 loans under IFRS 9/gross customer loans	1.6%	2.0%	0.4
Own coverage of Stage 3 loans under IFRS 9	41.4%	46.4%	5.0
Provision for impairment on loan losses/average gross loans	0.09%	0.30%	0.20
Performance Indicators	**2023**	**2024**	**pps**
ROA	2.2%	1.9%	(0.2)
ROE	19.7%	16.1%	(3.6)
Total income margin	4.23%	4.28%	0.06
Net interest margin	3.23%	3.23%	0.01
Operating costs/Average assets	1.7%	1.8%	0.1
Cost/income ratio	39.9%	42.1%	2.3
Net loans to deposits (FX-adjusted)	60%	60%	0

FX rates	2023 HUF	2024 HUF	Change %
HUF/EUR (closing)	382.8	410.1	7
HUF/EUR (average)	382.3	394.2	3

By the legal and organizational integration of SKB and Nova KBM, the merger of the two Slovenian banks was successfully completed on 22 August 2024. The planned cost synergies are steadily utilized, most of them are likely to appear in 2025.

The **Slovenian operation** generated HUF 113 billion profit after tax, which is consistent with 12% y-o-y growth and 16.1% annual ROE. One reason for the y-o-y higher profit is that NKBM was consolidated starting from February 2023, therefore it gave only eleven months' profit contribution in the base period. The size of the profit after tax was adversely affected by the fact that the corporate income tax rate in Slovenia has increased from 19% to 22% y-o-y.

The annual operating profit has improved by 11% y-o-y; within that, net interest income grew by 14%, while fee and commission incomes were 17% higher than in the base period. The improvement in net interest income materially benefited from the fact that the level of benchmark interest rates declined slower and by a smaller degree than originally expected. Annual net interest margin (3.23%) overall stagnated y-o-y; however, the quarterly changes reflected a steady decline simultaneously with the ECB's interest rate cuts started from June. The annual net interest income benefited from an increase in the share of consumer loans within the product structure on the loan side, and from the investment of the extra liquidity into assets with higher yields.

As part of the integration, the merged bank's branch network declined in 4Q from 104 to 82 units by the end of December 2024. Meanwhile the number of ATMs dropped by 15 and the workforce declined by 70 people.

The Bank's annual cost/income ratio increased to 42.1%, from 39.8% in 2023.

The quality of the loan portfolio was overall stable. The ratio of Stage 2 loans has increased to 14.6% In case of the retail book the carry-over effect of applying the standardized methodology following the integration pushed up the Stage 2 ratio; their coverage increased, too. The annual credit risk cost ratio was 30 bps (2023: 9 bps), which is lower than the group-level indicator.

The FX-adjusted performing loan portfolio shrank by 3% in the full year. Within the retail loan portfolio, the stock of consumer loans expanded dynamically, by 10%, while that of mortgage loans practically remained unchanged. The SME loan portfolio fell by 5% y-o-y. Corporate loans fell by 12% y-o-y, partly due to a large-amount early repayment and to generally subdued borrowing appetite.

The reorganizations relating to the integration affected the sales of mortgage loans particularly adversely, but in 2024 the bank lost its previous market positions in practically all major loan product segments. The losses of corporate debt volumes and market share can also be explained by technical reasons: the leasing company, which was sold due to legal obligations, repaid its previously existing loan in September (EUR 100 million).

FX-adjusted deposit volumes shrank by 3% y-o-y, with retail volumes remaining almost unchanged, while corporate deposits eroded by 12%. The 60% level of the Slovenian operation's net loan/deposit ratio is still one of the lowest within OTP Group.

At the end of 2024, the Slovenian operation's MREL eligible liabilities exceeded EUR 900 million; four-fifths of which are Senior Preferred bonds.

OTP BANK CROATIA

Performance of OTP Bank Croatia:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	53,333	61,743	16
Adjustments (after tax)	0	0	
Adjusted profit after tax	53,333	61,743	16
Income tax	(11,786)	(13,675)	16
Profit before income tax	65,119	75,417	16
Operating profit	66,116	73,593	11
Total income	123,133	138,874	13
Net interest income	91,117	105,300	16
Net fees and commissions	25,661	28,923	13
Other net non-interest income	6,355	4,652	(27)
Operating expenses	(57,017)	(65,282)	14
Total provisions	(997)	1,825	
Provision for impairment on loan losses	721	10,435	
Other provision	(1,718)	(8,610)	401
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	3,278,199	3,784,532	15
Gross customer loans	2,311,788	2,762,945	20
Gross customer loans (FX-adjusted)	2,476,818	2,762,945	12
Stage 1+2 customer loans (FX-adjusted)	2,380,108	2,683,926	13
Retail loans	1,247,616	1,467,012	18
Retail mortgage loans	687,081	781,115	14
Retail consumer loans	488,648	590,381	21
MSE loans	71,888	95,516	33
Corporate loans	943,290	992,666	5
Leasing	189,202	224,248	19
Allowances for possible loan losses	(97,835)	(88,780)	(9)
Allowances for possible loan losses (FX-adjusted)	(104,813)	(88,780)	(15)
Deposits from customers	2,385,223	2,683,855	13
Deposits from customers (FX-adjusted)	2,562,188	2,683,855	5
Retail deposits	1,871,758	1,970,271	5
Retail deposits	1,645,510	1,718,765	4
MSE deposits	226,248	251,506	11
Corporate deposits	690,430	713,584	3
Liabilities to credit institutions	373,142	465,507	25
Subordinated debt	23,438	45,555	94
Total shareholders' equity	403,487	483,716	20
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	1,932,763	2,384,302	23
Stage 1 loans under IFRS 9/gross customer loans	83.6%	86.3%	2.7
Own coverage of Stage 1 loans under IFRS 9	0.6%	0.5%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)	288,751	299,625	4
Stage 2 loans under IFRS 9/gross customer loans	12.5%	10.8%	(1.6)
Own coverage of Stage 2 loans under IFRS 9	7.6%	6.7%	(0.9)
Stage 3 loan volume under IFRS 9 (in HUF million)	90,274	79,019	(12)
Stage 3 loans under IFRS 9/gross customer loans	3.9%	2.9%	(1.0)
Own coverage of Stage 3 loans under IFRS 9	72.0%	72.1%	0.1
Provision for impairment on loan losses/average gross loans	(0.03%)	(0.41%)	(0.38)
Performance Indicators	**2023**	**2024**	**pps**
ROA	1.8%	1.7%	0.0
ROE	14.1%	14.2%	0.1
Total income margin	4.05%	3.93%	(0.12)
Net interest margin	2.99%	2.98%	(0.02)
Operating costs/Average assets	1.9%	1.8%	0.0
Cost/income ratio	46.3%	47.0%	0.7
Net loans to deposits (FX-adjusted)	93%	100%	7
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/EUR (closing)	382.8	410.1	7
HUF/EUR (average)	382.3	394.2	3

The **Croatian bank** generated almost HUF 62 billion profit after tax (+16% y-o-y) in full year 2024. Based on average shareholders' equity and full-year profit, ROE was 14.2% last year.

Regarding profit dynamics, on the income side, net interest income, the weight of which exceeded 75% last year, expanded by 16% y-o-y, while performing loan volumes increased by double digits and net interest margin narrowed by 2 bps y-o-y. In 2024, the European Central Bank reduced the euro area's key interest rate four times, by a total of 100 bps. In the declining interest rate environment, quarterly margins followed a slightly decreasing trend.

As a result of a broad-based growth, net fees and commissions increased by 13% last year.

Full-year operating expenses grew by 14% (or 10% in EUR).As to annual dynamics, the increase in other expenses stemmed from higher IT and real-estate-related costs, while supervisory fees were lower y-o-y. Overall, the cost/income ratio declined by 0.7 percentage points, to 47.0% last year.

Some HUF 2 billion positive risk cost supported profit in 2024. Within that, positive credit risk cost was more than HUF 10 billion, owing to recoveries on Stage 3 claims. In 2024, other provision amounted to -HUF 8.6 billion, mainly in relation to litigations.

Loan quality showed an improvement: the ratio of Stage 3 loans dropped by 1.0 pp y-o-y, to 2.9%, owing to the overall improvement of the loan portfolio, and the partial repayment and/or partial write-off of large corporate loans classified as Stage 3. The own provision coverage of Stage 3 loans kept on improving: it landed at 72.1% at the end of December.

Performing (Stage 1+2) loan volumes grew by 13% y-o-y (FX-adjusted). The strenghening lending activity helped the retail portfolio surge by 18% y-o-y. The corporate portfolio increased slower (+5% y-o-y).

FX-adjusted deposit volumes grew by 5% y-o-y, including a 4% increase in retail and 5% surge in corporate (including MSE) deposits, due to the higher quality of services offered and the expansion of their scope, amid intensifying market competition. The Bank's net loan to deposit ratio stood at 100% at the end of December.

The total market share of OTP Group's Croatian operation rose y-o-y in both loan and deposit volumes, thus it stabilized its fourth place in the ranking of Croatia's loan market.

OTP BANK SERBIA

Performance of OTP Bank Serbia:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	58,211	66,496	14
Adjustments (after tax)	0	0	
Adjusted profit after tax	58,211	66,496	14
Income tax	(9,143)	(10,973)	20
Profit before income tax	67,354	77,469	15
Operating profit	81,177	95,474	18
Total income	132,147	153,562	16
Net interest income	103,730	116,621	12
Net fees and commissions	18,419	21,726	18
Other net non-interest income	9,998	15,216	52
Operating expenses	(50,970)	(58,089)	14
Total provisions	(13,823)	(18,005)	30
Provision for impairment on loan losses	(11,030)	(15,860)	44
Other provision	(2,793)	(2,145)	(23)
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	2,874,794	3,483,775	21
Gross customer loans	1,978,855	2,341,379	18
Gross customer loans (FX-adjusted)	2,121,369	2,341,379	10
Stage 1+2 customer loans (FX-adjusted)	2,059,458	2,279,476	11
Retail loans	939,051	1,071,596	14
Retail mortgage loans	443,211	487,858	10
Retail consumer loans	442,685	523,305	18
MSE loans	53,156	60,433	14
Corporate loans	1,020,076	1,092,707	7
Leasing	100,330	115,173	15
Allowances for possible loan losses	(66,259)	(81,828)	23
Allowances for possible loan losses (FX-adjusted)	(71,056)	(81,828)	15
Deposits from customers	1,868,078	2,343,130	25
Deposits from customers (FX-adjusted)	2,005,508	2,343,130	17
Retail deposits	1,005,893	1,266,518	26
Retail deposits	854,791	1,095,447	28
MSE deposits	151,103	171,072	13
Corporate deposits	999,614	1,076,611	8
Liabilities to credit institutions	506,900	565,834	12
Subordinated debt	66,381	71,443	8
Total shareholders' equity	368,344	436,608	19
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	1,661,365	2,012,765	21
Stage 1 loans under IFRS 9/gross customer loans	84.0%	86.0%	2.0
Own coverage of Stage 1 loans under IFRS 9	0.7%	0.6%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)	259,780	266,711	3
Stage 2 loans under IFRS 9/gross customer loans	13.1%	11.4%	(1.7)
Own coverage of Stage 2 loans under IFRS 9	6.7%	10.9%	4.1
Stage 3 loan volume under IFRS 9 (in HUF million)	57,710	61,903	7
Stage 3 loans under IFRS 9/gross customer loans	2.9%	2.6%	(0.3)
Own coverage of Stage 3 loans under IFRS 9	63.8%	64.8%	1.0
Provision for impairment on loan losses/average gross loans	0.57%	0.75%	0.17
Performance Indicators	**2023**	**2024**	**pps**
ROA	2.2%	2.1%	0.0
ROE	16.6%	16.5%	(0.1)
Total income margin	4.93%	4.94%	0.01
Net interest margin	3.87%	3.75%	(0.12)
Operating costs/Average assets	1.9%	1.9%	0.0
Cost/income ratio	38.6%	37.8%	(0.7)
Net loans to deposits (FX-adjusted)	102%	96%	(6)
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/RSD (closing)	3.3	3.5	7
HUF/RSD (average)	3.3	3.4	3

In 2024, the **Serbian banking group** realized more than HUF 66 billion profit after tax. The 14% y-o-y increase in annual profit was driven by stronger operating result, mitigated by the 30% higher risk costs. Based on average shareholders' equity and full-year profit, ROE was 16.5%.

During the year, revenues increased by 16% (by 12% in RSD terms). Within this, net interest income rose by 12%, supported by the expansion of both performing loans and of financial assets. Net interest margin topped out in 3Q 2023, and has been slowly eroding since then in the falling interest rate environment. Margin stood at 3.75% in 2024 (–12 bps y-o-y). Net fees and commissions grew by 18%, supported by stronger income from fees on deposits, transactions, and card commissions. During the year, operating expenses surged by 14% y o-y (by 10% in RSD terms), as a result of the wage increase implemented in the high-wage-inflation environment, higher supervisory charges, as well as elevated IT, marketing, and training expenses. Cost efficiency indicators further improved; the annual cost/income ratio (37.8%, –0.7 pps y-o-y) was one of the lowest among group members.

Credit risk costs were 44% higher than in the previous year, thus the credit risk cost ratio jumped to 75 bps. Impairments for loan losses were mostly recognized in the last quarter: first, due to the elevated risks related to a large corporate exposure, it became warranted to increase the coverage level, and second, due to the HUF 2.1 billion impairment loss incurred because of the extension of the interest rate cap. On 21 November, the National Bank of Serbia approved the extension of the mortgage interest rate cap introduced in October 2023, a measure that would have expired at the end of 2024. The interest rate cap on variable-rate loans increased from 4.1% in 2024 to 5% between 1 January and 31 December 2025.

Overall, loan portfolio quality improved: the ratio of Stage 3 loans was 2.6% at the end of December (–0.3 pps y-o-y), while their own provision coverage rose by 1.0 pp y-o-y, to 64.8%.

The performing (Stage 1+2) loan book grew by 11% y o-y (FX-adjusted). Within that, mortgage loans increased by 10% y-o-y . As the upper limit of the available loan amount was raised, consumer loans expanded by 18% y-o-y (FX-adjusted), mainly driven by the growth in cash loans and car loans. The stock of corporate (including MSE) loans expanded by 8% y-o-y.

The Serbian operation's deposit book grew by an FX-adjusted 17% y-o-y, to over HUF 2,300 billion at the end of December. Within this, the volume of retail deposits surged by 28% y-o-y, alongside with higher offered interest rates. This brought the net loan/deposit ratio to 96%, down from 144% at the end of September 2022.

IPOTEKA BANK (UZBEKISTAN)

Performance of Ipoteka Bank (Uzbekistan):

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	(52,760)	52,893	
Adjustments (after tax)	(37,338)	0	
Adjusted profit after tax	(15,422)	52,893	
Income tax	(3,381)	(10,949)	224
Profit before income tax	(12,041)	63,842	
Operating profit	40,143	78,037	94
Total income	66,089	125,768	90
Net interest income	53,006	108,715	105
Net fees and commissions	5,261	9,502	81
Other net non-interest income	7,822	7,551	(3)
Operating expenses	(25,946)	(47,731)	84
Total provisions	(52,184)	(14,195)	(73)
Provision for impairment on loan losses	(51,354)	(11,472)	(78)
Other provision	(830)	(2,723)	228
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	1,187,368	1,509,536	27
Gross customer loans	961,533	1,063,551	11
Gross customer loans (FX-adjusted)	1,051,933	1,063,551	1
Stage 1+2 customer loans (FX-adjusted)	926,285	915,790	(1)
Retail loans	778,554	722,673	(7)
Retail mortgage loans	379,317	435,597	15
Retail consumer loans	230,915	249,612	8
MSE loans	168,322	37,464	(78)
Corporate loans	147,731	193,117	31
Allowances for possible loan losses	(96,738)	(120,766)	25
Allowances for possible loan losses (FX-adjusted)	(106,164)	(120,766)	14
Deposits from customers	327,161	528,602	62
Deposits from customers (FX-adjusted)	358,363	528,602	48
Retail deposits	260,159	270,912	4
Retail deposits	125,410	179,133	43
MSE deposits	134,749	91,779	(32)
Corporate deposits	98,205	257,690	162
Liabilities to credit institutions	561,466	566,620	1
Issued securities	121,082	158,546	31
Subordinated debt	12,162	13,358	10
Total shareholders' equity	145,941	214,152	47
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	687,698	716,723	4
Stage 1 loans under IFRS 9/gross customer loans	71.5%	67.4%	(4.1)
Own coverage of Stage 1 loans under IFRS 9	2.8%	2.6%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)	159,737	199,067	25
Stage 2 loans under IFRS 9/gross customer loans	16.6%	18.7%	2.1
Own coverage of Stage 2 loans under IFRS 9	21.6%	19.6%	(2.0)
Stage 3 loan volume under IFRS 9 (in HUF million)	114,098	147,761	30
Stage 3 loans under IFRS 9/gross customer loans	11.9%	13.9%	2.0
Own coverage of Stage 3 loans under IFRS 9	38.0%	42.6%	4.6
Provision for impairment on loan losses/average gross loans	10.03%	1.16%	(8.88)
Performance Indicators	**2023**	**2024**	**pps**
ROA	(2.4%)	4.0%	6.4
ROE	(16.3%)	30.2%	46.5
Total income margin	10.08%	9.61%	(0.47)
Net interest margin	8.08%	8.31%	0.23
Operating costs/Average assets	4.0%	3.6%	(0.3)
Cost/income ratio	39.3%	38.0%	(1.3)
Net loans to deposits (FX-adjusted)	264%	178%	(86)
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/1,000 UZS (closing)	28.1	30.5	9
HUF/1,000 UZS (average)	30.1	28.8	(4)

The balance sheet of Ipoteka Bank was consolidated in the second quarter of 2023, and its P&L was included in OTP Group's adjusted P&L account starting from the third quarter of 2023.

Based on end-2024 data, **Ipoteka Bank** is the fifth largest bank in Uzbekistan, with almost 7% market share by total assets. The number of retail customers (1.8 million) surged by almost 18% since the Bank joined the Group at the end of June 2023.

In 2024, the Bank generated HUF 53 billion profit after tax, which brought its ROE to 30%. Net interest margin improved by 23 bps, while the cost/income ratio by 1.3 pps, and the cost-to-asset ratio by 0.3 pp compared to the previous year. The bank's cost/income ratio was 38% in 2024.

In 2024, total risk cost amounted to -HUF 14 billion; of that, the -HUF 11.5 billion impairment on loan losses brought the credit risk cost ratio to 1.16%. This was due to the continuous review and development of the risk management process, and to the stabilizing credit quality indicators in 2024. In 2024, other risk costs arose mainly in 4Q, partly explained by provisions allocated to other assets and the fact that the impairment loss related to penalty interest was reclassified from other risk costs to the provision for impairment on loan losses line (in 4Q this increased other risk cost by HUF 0.8 billion, as the releases accounted for in 2024 were reclassified in one sum).

In 2024, the ratio of Stage 3 loans increased by 2 pps to 13.9% y-o-y, mainly due to the shifting of corporate exposures in the first half-year. The own coverage of Stage 3 loans stood at 42.6%.

In 2024, not only credit quality trends stabilized, but the Bank's balance sheet structure also improved significantly: the net loan/deposit ratio improved by 86 pps y-o-y, to 178%, down from 307% at the time when Ipoteka Bank was consolidated into the Group. The net/loan deposit ratio, without the subsidized and state-refinanced mortgage loans, stood at 110% at the end of 2024.

At the end of 2024, deposits amounted to HUF 529 billion (+48% y-o-y). Retail deposits rose by 43% y-o-y, and corporate deposits grew by 50%.

The performing loan book stagnated y-o-y (FX-adjusted). Retail loans expanded by 12% y-o-y, well below market dynamics. The volume of mortgage loans grew by 15% y-o-y, largely owing to a newly launched state programme.

Corporate (including MSE) performing loans fell by 27% y-o-y, as a result of reclassifications into the Stage 3 segment and moderate disbursements.

On 25 April, the Bank successfully refinanced bonds, which was necessary because the senior unsecured bonds issued in 2021 with nominal value of UZS 785 billion matured in April 2024. The new series was issued in a nominal value of UZS 1.370 billion (USD 108 million equivalent), with three-year maturity, and 20.5% annual coupon.

Performance of OTP Bank Ukraine:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	44,908	41,179	(8)
Adjustments (after tax)	0	0	
Adjusted profit after tax	44,908	41,179	(8)
Income tax	(37,174)	(31,663)	(15)
Profit before income tax	82,082	72,842	(11)
Operating profit	78,018	68,414	(12)
Total income	108,853	101,605	(7)
Net interest income	93,450	89,894	(4)
Net fees and commissions	10,837	7,769	(28)
Other net non-interest income	4,567	3,942	(14)
Operating expenses	(30,835)	(33,191)	8
Total provisions	4,064	4,428	9
Provision for impairment on loan losses	10,654	9,123	(14)
Other provision	(6,590)	(4,695)	(29)
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	1,036,912	1,186,801	14
Gross customer loans	393,741	440,897	12
Gross customer loans (FX-adjusted)	417,978	440,897	5
Stage 1+2 customer loans (FX-adjusted)	326,545	391,837	20
Retail loans	29,004	41,136	42
Retail mortgage loans	2,004	1,230	(39)
Retail consumer loans	26,925	39,848	48
MSE loans	75	58	(22)
Corporate loans	208,991	251,128	20
Leasing	88,550	99,573	12
Allowances for possible loan losses	(84,671)	(52,283)	(38)
Allowances for possible loan losses (FX-adjusted)	(90,788)	(52,283)	(42)
Deposits from customers	736,621	842,437	14
Deposits from customers (FX-adjusted)	782,957	842,437	8
Retail deposits	295,816	301,782	2
Retail deposits	248,572	261,776	5
MSE deposits	47,244	40,006	(15)
Corporate deposits	487,141	540,655	11
Liabilities to credit institutions	91,154	97,486	7
Subordinated debt	7,530	8,879	18
Total shareholders' equity	157,088	205,705	31
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	208,563	323,190	55
Stage 1 loans under IFRS 9/gross customer loans	53.0%	73.3%	20.3
Own coverage of Stage 1 loans under IFRS 9	1.9%	2.2%	0.3
Stage 2 loan volume under IFRS 9 (in HUF million)	99,891	68,647	(31)
Stage 2 loans under IFRS 9/gross customer loans	25.4%	15.6%	(9.8)
Own coverage of Stage 2 loans under IFRS 9	14.4%	13.3%	(1.0)
Stage 3 loan volume under IFRS 9 (in HUF million)	85,287	49,059	(42)
Stage 3 loans under IFRS 9/gross customer loans	21.7%	11.1%	(10.5)
Own coverage of Stage 3 loans under IFRS 9	77.9%	73.7%	(4.2)
Provision for impairment on loan losses/average gross loans	(2.38%)	(2.21%)	0.17
Performance Indicators	**2023**	**2024**	**pps**
ROA	4.4%	3.8%	(0.6)
ROE	30.3%	22.4%	(8.0)
Total income margin	10.65%	9.39%	(1.26)
Net interest margin	9.14%	8.30%	(0.84)
Operating costs/Average assets	3.0%	3.1%	0.0
Cost/income ratio	28.3%	32.7%	4.3
Net loans to deposits (FX-adjusted)	42%	46%	4
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/UAH (closing)	9.1	9.4	3
HUF/UAH (average)	9.6	9.1	(5)

In 2024 **OTP Bank Ukraine's** profit after tax amounted to HUF 41 billion (-8% y-o-y), as loan growth resumed, while stable liquidity and capital positions remained in place. Operating profit declined by 12% compared to the base period, but risk costs remained in the positive territory. All this resulted in an ROE of 22.4%.

On 10 October 2024, the Ukrainian parliament passed a law pursuant to which the corporate income tax rate on banks was increased from 25% to 50% retroactively for the whole year. In addition, effective from 2025 the corporate income tax rate for other financial corporations was raised from 18% to 25%.

Net interest income for the full year fell by 4% y-o-y in HUF terms (and grew by 1% in UAH terms), while the net interest margin narrowed by 84 bps, mainly due to the lower interest rate earned on deposits placed with the National Bank of Ukraine. The overnight deposit rate at the central bank stood at 23% back in the first half of 2023, before a steady decline brought it down to 13% between July 2023 and June 2024. Since then, there have been two interest rate hikes: the National Bank of Ukraine raised rates by 50 bps on 12 December 2024, and by 100 bps on 23 January 2025.

Operating expenses for the full year increased by 8% (+14% in UAH terms), predominantly driven by higher personnel expenses, largely owing to the general wage increase that exceeded the rate of inflation. Within other expenses, IT and IT services-related costs went up. The annual cost to income ratio rose by 4.3 pps y-o-y, to 32.7%, thus remaining significantly better than the Group's similar ratio.

Underlying loan quality trends kept on devel oping favourably: during the year, positive risk costs amounted to HUF 4.4 billion. Of that, HUF 9.1 billion positive credit risk cost was recorded, mostly in relation to the corporate and leasing portfolios, while on the other risk cost line, HUF 4.7 billion provision was created due to the Ukrainian government bond portfolio's dynamic expansion.

The ratio of Stage 3 loans in the portfolio improved by 10.5 pps y-o-y to 11.1%, and their own coverage ratio hit 73.7%. In 2024, HUF 31 billion worth of non-performing loans were sold/written off. The downtrend in the ratio of Stage 2 loans continued in the fourth quarter; first, through the repayment of Stage 2 loans, second, thanks to the improvement in the corporate segment. Thus the Stage 2 ratio declined by 9.8 pps y-o-y.

Amid prudent lending standards, the FX-adjusted volume of performing (Stage 1+2) loans grew by 20% y-o-y, from a low base. Within that, retail consumer loans surged by almost 50% (FX-adjusted). The Government of Ukraine announced the Lending Development Strategy; as part of this, banks, including OTP's Ukrainian subsidiary, signed a memorandum in the summer of 2024 on lending to companies on favourable terms, particularly in the energy sector. Accordingly, corporate volumes expanded by 20% y-o-y.

The FX-adjusted deposit base expanded by 8% y-o-y; the engine of growth was the 11% y-o-y increase in the corporate book, while the retail book rose by 5%.

The bank's capital adequacy ratio significantly exceeded the regulatory minimum requirements, exceeding 39.4% at the end of December (regulatory minimum: 10.0%). Gross intergroup financing to the Ukrainian operation amounted to the equivalent of HUF 55 billion at the end of December 2025.

Performance of CKB Group (Montenegro):

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	21,358	24,194	13
Adjustments (after tax)	0	0	
Adjusted profit after tax	21,358	24,194	13
Income tax	(3,861)	(4,385)	14
Profit before income tax	25,218	28,579	13
Operating profit	23,018	27,169	18
Total income	38,425	45,660	19
Net interest income	29,771	35,460	19
Net fees and commissions	7,797	9,729	25
Other net non-interest income	857	472	(45)
Operating expenses	(15,407)	(18,492)	20
Total provisions	2,200	1,410	(36)
Provision for impairment on loan losses	2,929	1,947	(34)
Other provision	(728)	(538)	(26)
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	663,676	776,370	17
Gross customer loans	452,493	545,499	21
Gross customer loans (FX-adjusted)	484,777	545,499	13
Stage 1+2 customer loans (FX-adjusted)	464,400	529,602	14
Retail loans	227,938	276,313	21
Retail mortgage loans	111,517	131,639	18
Retail consumer loans	110,534	137,035	24
MSE loans	5,887	7,639	30
Corporate loans	236,462	250,740	6
Leasing	0	2,548	(100)
Allowances for possible loan losses	(17,625)	(16,862)	(4)
Allowances for possible loan losses (FX-adjusted)	(18,882)	(16,862)	(11)
Deposits from customers	520,168	606,957	17
Deposits from customers (FX-adjusted)	557,998	606,957	9
Retail deposits	349,643	381,474	9
Retail deposits	268,046	296,784	11
MSE deposits	81,597	84,690	4
Corporate deposits	208,356	225,483	8
Liabilities to credit institutions	2,309	19,157	730
Total shareholders' equity	113,004	121,390	7
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	399,886	492,319	23
Stage 1 loans under IFRS 9/gross customer loans	88.4%	90.3%	1.9
Own coverage of Stage 1 loans under IFRS 9	0.8%	0.6%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)	33,587	37,282	11
Stage 2 loans under IFRS 9/gross customer loans	7.4%	6.8%	(0.6)
Own coverage of Stage 2 loans under IFRS 9	5.1%	4.8%	(0.4)
Stage 3 loan volume under IFRS 9 (in HUF million)	19,020	15,898	(16)
Stage 3 loans under IFRS 9/gross customer loans	4.2%	2.9%	(1.3)
Own coverage of Stage 3 loans under IFRS 9	67.2%	74.9%	7.7
Provision for impairment on loan losses/average gross loans	(0.67%)	(0.39	0.28
Performance Indicators	**2023**	**2024**	**pps**
ROA	3.4%	3.5%	0.1
ROE	20.6%	21.5%	0.9
Total income margin	6.11%	6.58%	0.47
Net interest margin	4.74%	5.11%	0.38
Operating costs/Average assets	2.5%	2.7%	0.2
Cost/income ratio	40.1%	40.5%	0.4
Net loans to deposits (FX-adjusted)	83%	87%	4
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/EUR (closing)	382.8	410.1	7
HUF/EUR (average)	382.3	394.2	3

In 2024, the Montenegrin **CKB Group** realized HUF 24 billion profit after tax (+13% y-o-y). Its ROE exceeded 21%.

In 2024, total income expanded by 19% y-o-y, driven by a 19% surge in net interest income, as well as 25% jump in commissions, while other income halved. Both growing average volumes, and the rising interest margin (+38 bps) helped net interest income. The rise in net fees mostly stemmed from improving card fee income. Annual operating expenses grew by 16% in EUR terms, with personnel expenses, depreciation, and other expenses equally contributing to the increase. The Bank's cost/income ratio stood at 40.5% in 2024, 40 bps higher than in 2023.

In 2024, credit risk costs amounted to +HUF 1.4 billion, mainly as a result of the revision of IFRS 9 model parameters in 3Q, and the release of HUF 1.2 billion provisions due to the improving credit quality in 4Q.

Loan quality indicators developed favourably during the year: the ratio of Stage 3 loans dropped to 2.9% (–1.3 pps y-o-y). The own provision coverage of Stage 3 loans stood at 74.9% at the end of 2024 (+7.7 pps y-o-y). The ratio of Stage 2 loans sank by 0.6 pp, to 6.8% y-o-y.

Performing (Stage 1+2) loans rose by 14% y-o-y (FX-adjusted). The expansion of both outstanding stocks and disbursements was supported by the Bank's participation in the central bank's mortgage and cash loan rate reduction initiative, under which banks could voluntarily reduce lending rates on new disbursements between 18 April 2024 and 31 December 2024. In the case of CKB, for cash loans with maturity of less than six years, there was 2 pps decline irrespective of the loan amount; as a result, disbursements jumped by 34% y-o-y and the outstanding volumes expanded by 24%. In the field of mortgage loans, the Bank launched a new mortgage loan facility, to help first-time home buyers younger than 30. As a result, disbursement grew by 49% y-o-y and volumes expanded by 18%. Corporate loan disbursements also grew strongly in 2024, with placements increasing by 50% y-o-y. In 2024, the Bank entered the leasing market, thus leasing volumes amounted to HUF 2.8 billion by the end of the year.

The FX-adjusted deposit book expanded by 9% y-o-y. The y-o-y growth benefited from the 11% increase in retail deposits, as well as from the 7% rise in corporate + MSE deposits.

The net loan/deposit ratio stood at 87% at the end of the year.

OTP BANK ALBANIA

Performance of OTP Bank Albania:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	11,603	19,686	70
Adjustments (after tax)	0	0	
Adjusted profit after tax	11,603	19,686	70
Income tax	(2,471)	(3,763)	52
Profit before income tax	14,073	23,449	67
Operating profit	13,750	23,145	68
Total income	33,123	40,047	21
Net interest income	27,912	33,531	20
Net fees and commissions	3,465	4,243	22
Other net non-interest income	1,746	2,274	30
Operating expenses	(19,373)	(16,902)	(13)
Total provisions	324	304	(6)
Provision for impairment on loan losses	108	0	
Other provision	216	304	41
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	669,765	791,495	18
Gross customer loans	367,947	476,303	29
Gross customer loans (FX-adjusted)	405,990	476,303	17
Stage 1+2 customer loans (FX-adjusted)	380,790	452,213	19
Retail loans	180,114	201,778	12
Retail mortgage loans	124,927	143,981	15
Retail consumer loans	26,264	30,515	16
MSE loans	28,922	27,282	(6)
Corporate loans	194,531	241,788	24
Leasing	6,145	8,647	41
Allowances for possible loan losses	(17,690)	(20,422)	15
Allowances for possible loan losses (FX-adjusted)	(19,549)	(20,422)	4
Deposits from customers	547,854	615,186	12
Deposits from customers (FX-adjusted)	603,787	615,186	2
Retail deposits	518,726	554,511	7
Retail deposits	477,476	497,590	4
MSE deposits	41,250	56,921	38
Corporate deposits	85,061	60,675	(29)
Liabilities to credit institutions	8,138	14,919	83
Subordinated debt	2,861	0	(100)
Total shareholders' equity	81,102	114,649	41
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	312,494	416,249	33
Stage 1 loans under IFRS 9/gross customer loans	84.9%	87.4%	2.5
Own coverage of Stage 1 loans under IFRS 9	0.9%	1.0%	0.1
Stage 2 loan volume under IFRS 9 (in HUF million)	32,677	35,965	10
Stage 2 loans under IFRS 9/gross customer loans	8.9%	7.6%	(1.3)
Own coverage of Stage 2 loans under IFRS 9	8.2%	8.0%	(0.2)
Stage 3 loan volume under IFRS 9 (in HUF million)	22,776	24,090	6
Stage 3 loans under IFRS 9/gross customer loans	6.2%	5.1%	(1.1)
Own coverage of Stage 3 loans under IFRS 9	53.3%	56.1%	2.8
Provision for impairment on loan losses/average gross loans	(0.03%)	0.00%	0.03
Performance Indicators	**2023**	**2024**	**pps**
ROA	1.8%	2.7%	0.9
ROE	16.3%	20.2%	3.9
Total income margin	5.15%	5.49%	0.34
Net interest margin	4.34%	4.60%	0.26
Operating costs/Average assets	3.0%	2.3%	(0.7)
Cost/income ratio	58.5%	42.2%	(16.3)
Net loans to deposits (FX-adjusted)	64%	74%	10
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/ALL (closing)	3.7	4.2	13
HUF/ALL (average)	3.5	3.9	12

In 2024, **OTP Bank Albania** generated HUF 20 billion profit after tax (+70% y-o-y in HUF terms, +50% in local currency terms). In 2024, the Bank's ROE exceeded 20%.

At the end of 2024, the Bank's market share by net loan volumes was 13%, rendering it the third largest lender in Albania. At the end of the year, the number of bank branches was 50, and the number of employees was 700.

In 2024, operating expenses fell by 22% y-o-y in local currency terms, thus the Bank's cost efficiency indicator improved by 16.3 pps compared to the previous year. This was largely due to acquisition completed in July 2022, as the realization of synergies began after the integration process was accomplished by December 2023. As a result, the cost-to-income ratio improved to 42.2% in 2024.

The operating profit increased by 68% in HUF (+50% in local currency terms), as a result of a 13% decrease in operating expenses and a 21% increase in total income. During the year, net interest income grew by 20%, net fees and commissions jumped by 22% and other income surged 30%. The increase in net interest income can be primarily attributed to the expansion of performing loan and the deposit volumes. In 2024, the amount of risk costs was +HUF 0.3 billion, mainly owing to the revision of the IFRS 9 risk parameters. The ratio of Stage 3 loans improved by 1.1 pps y-o-y, to 5.1%.

Overall, the FX-adjusted performing (Stage 1+2) loan book expanded by 19% in 2024, driven by a 12% increase in retail loans and a 24% growth in corporate.

Customer deposits rose by 2% y-o-y (FX-adjusted), as retail deposits increased by 7% and corporate deposits contracted by 29%. The net loan-to-deposit ratio rose by 10 pps y-o-y, reaching the Group's level, 74%.

OTP BANK MOLDOVA

Performance of OTP Bank Moldova:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	14,624	11,492	(21)
Adjustments (after tax)	0	0	
Adjusted profit after tax	14,624	11,492	(21)
Income tax	(2,047)	(1,546)	(24)
Profit before income tax	16,671	13,038	(22)
Operating profit	13,352	12,413	(7)
Total income	25,275	26,179	4
Net interest income	16,349	15,353	(6)
Net fees and commissions	2,389	2,483	4
Other net non-interest income	6,537	8,343	28
Operating expenses	(11,923)	(13,765)	15
Total provisions	3,319	625	(81)
Provision for impairment on loan losses	3,106	574	(82)
Other provision	213	51	(76)
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	428,192	455,246	6
Gross customer loans	150,228	180,472	20
Gross customer loans (FX-adjusted)	161,243	180,472	12
Stage 1+2 customer loans (FX-adjusted)	154,943	174,886	13
Retail loans	72,352	81,055	12
Retail mortgage loans	39,767	40,976	3
Retail consumer loans	22,366	29,038	30
MSE loans	10,218	11,042	8
Corporate loans	77,765	88,337	14
Leasing	4,827	5,494	14
Allowances for possible loan losses	(7,122)	(7,209)	1
Allowances for possible loan losses (FX-adjusted)	(7,653)	(7,209)	(6)
Deposits from customers	332,062	359,474	8
Deposits from customers (FX-adjusted)	358,468	359,474	0
Retail deposits	220,562	206,350	(6)
Retail deposits	181,338	162,193	(11)
MSE deposits	39,225	44,156	13
Corporate deposits	137,906	153,124	11
Liabilities to credit institutions	27,489	20,459	(26)
Total shareholders' equity	63,353	69,054	9
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	127,607	153,557	20
Stage 1 loans under IFRS 9/gross customer loans	84.9%	85.1%	0.1
Own coverage of Stage 1 loans under IFRS 9	1.3%	1.2%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)	16,760	21,329	27
Stage 2 loans under IFRS 9/gross customer loans	11.2%	11.8%	0.7
Own coverage of Stage 2 loans under IFRS 9	11.7%	9.0%	(2.7)
Stage 3 loan volume under IFRS 9 (in HUF million)	5,861	5,586	(5)
Stage 3 loans under IFRS 9/gross customer loans	3.9%	3.1%	(0.8)
Own coverage of Stage 3 loans under IFRS 9	60.1%	62.9%	2.8
Provision for impairment on loan losses/average gross loans	(2.01%)	(0.36%)	1.65
Performance Indicators	**2023**	**2024**	**pps**
ROA	3.9%	2.7%	(1.2)
ROE	25.3%	17.4%	(7.9)
Total income margin	6.73%	6.06%	(0.67)
Net interest margin	4.35%	3.56%	(0.80)
Operating costs/Average assets	3.2%	3.2%	0.0
Cost/income ratio	47.2%	52.6%	5.4
Net loans to deposits (FX-adjusted)	43%	48%	5
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/MDL (closing)	19.9	21.3	7
HUF/MDL (average)	19.5	20.5	6

In 2024, **OTP Bank Moldova** generated HUF 11.5 billion profit after tax, 21% less than in the base period. ROE reached 17.4% in 2024.

In 2024, the Bank's total income grew by 4% y-o-y. Within that, the 6% drop in net interest income was largely influenced by the sharp decline in the interest rate environment from the highs at the beginning of 2023 (base rate in 1Q 2023: 17% vs. 3.6% in 4Q 2024). This was also the main reason for the 80 bps y-o-y erosion in net interest margin. The 28% surge in other income largely stemmed from large-amount currency conversions by corporations.

Operating expenses grew by 15% in HUF and by 9% in local currency terms, predominantly because of higher wages and, under other expenses, owing to the rise in IT costs and supervisory charges.

In 2024, HUF 0.6 billion worth of positive risk cost was recorded, partly as a result of the improving economic environment, and the revision of the IFRS 9 model parameters.

The ratio of Stage 3 loans sank to 3.1% (–0.8 pp y-o-y), and their own provision coverage was 63%, in a nearly 3 pps y-o-y uptick.

The FX-adjusted stock of performing (Stage 1+2) loans grew by 13% y-o-y, as retail loans increased by 12%, while leasing and corporate loan volumes expanded by 14% each. Retail loan growth largely stemmed from a 30% jump in consumer loan volumes; mortgage loans rose at modest pace of 3%.

FX-adjusted deposit volumes stagnated last year; within that, retail deposits shrank by 6%, but corporate deposits grew by 11%.

The net loan/deposit ratio stood at 48% at the end of the year. Deposits from banks continued their downward trend of recent quarters, reflecting the Bank's strong liquidity position.

Performance of OTP Bank Russia:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	95,674	136,946	43
Adjustments (after tax)	0	0	
Adjusted profit after tax	95,674	136,946	43
Income tax*	(34,506)	(58,589)	70
Profit before income tax	130,180	195,536	50
Operating profit	149,307	252,216	69
Total income	223,654	343,619	54
Net interest income	122,084	187,070	53
Net fees and commissions	40,831	55,095	35
Other net non-interest income	60,739	101,454	67
Operating expenses	(74,347)	(91,403)	23
Total provisions	(19,126)	(56,681)	196
Provision for impairment on loan losses	(16,278)	(54,889)	237
Other provision	(2,848)	(1,792)	(37)
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	1,470,796	2,370,967	61
Gross customer loans	721,212	1,111,220	54
Gross customer loans (FX-adjusted)	684,725	1,111,220	62
Stage 1+2 customer loans (FX-adjusted)	591,915	1,057,903	79
Retail loans	575,515	1,053,490	83
Retail mortgage loans	1,178	932	(21)
Retail consumer loans	574,328	1,052,549	83
MSE loans	9	8	(10)
Corporate loans	16,400	4,413	(73)
Allowances for possible loan losses	(133,255)	(113,633)	(15)
Allowances for possible loan losses (FX-adjusted)	(127,038)	(113,633)	(11)
Deposits from customers	1,101,084	1,882,093	71
Deposits from customers (FX-adjusted)	1,069,472	1,882,093	76
Retail deposits	392,515	588,458	50
Retail deposits	274,009	440,870	61
MSE deposits	118,505	147,588	25
Corporate deposits	676,957	1,293,636	91
Liabilities to credit institutions	19,063	78,331	311
Subordinated debt	8,071	8,562	6
Total shareholders' equity	274,516	298,786	9
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in LCY million)	510,129	895,393	76
Stage 1 loans under IFRS 9/gross customer loans	70.7	80.6	9.8
Own coverage of Stage 1 loans under IFRS 9	3.0	3.0	0.0
Stage 2 loan volume under IFRS 9 (in LCY million)	114,001	162,509	43
Stage 2 loans under IFRS 9/gross customer loans	15.8	14.6	(1.2)
Own coverage of Stage 2 loans under IFRS 9	22.7	22.9	0.2
Stage 3 loan volume under IFRS 9 (in LCY million)	97,082	53,317	(45)
Stage 3 loans under IFRS 9/gross customer loans	13.5	4.8	(8.7)
Own coverage of Stage 3 loans under IFRS 9	95.0	93.5	(1.6)
Provision for impairment on loan losses/average gross loans	2.4	6.0	3.7
Performance Indicators	**2023**	**2024**	**pps**
ROA	8.0	7.2	(0.8)
ROE	33.9	45.3	11.4
Total income margin	18.69	18.11	(0.58)
Net interest margin	10.20	9.86	(0.34)
Operating costs/Average assets	6.2	4.8	(1.4)
Cost/income ratio	33.2	26.6	(6.6)
Net loans to deposits (FX-adjusted)	52	53	1
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/RUB (closing)	3.9	3.7	(5)
HUF/RUB (average)	4.2	3.9	(7)

* The Corporate income tax line includes the corporate income tax in the Russian segment, as well as the dividend taxes incurred at other members of OTP Group because of the Russian Group members' dividend payment.

OTP Bank Russia generated HUF 136.9 billion profit in 2024.

Corporate income tax surged by 70% y-o-y, owing to the higher pre-tax profit as well as the taxes associated with dividend payments . Pursuant to the regulation passed in July 2024 the corporate income tax rate in Russia was increased to 25% from 1 January 2025, from the former 20%.

The annual net interest margin narrowed by 34 bps y-o-y, while net interest income grew by 53%.

In 2024, net fees and commissions expanded by 35% y-o-y, mainly as a result of the rising account- and transaction fees owing to the growing deposit volumes.

The 30% increase in cumulated operating expenses in RUB terms was mostly shaped by inflation processes, while in Russia the number of branches has shrank by 42% and the number of employees by 23% since the beginning of the war. The bank's cost/income ratio was 27% in 2024.

The volume of Stage 3 loans declined significantly as a result of a sale of problem loans in the fourth quarter, bringing down the Stage 3 ratio to 4.8%. The annual credit risk costs tripled y-o-y, the credit risk cost ratio was 6%.

FX-adjusted performing (Stage 1+2) retail consumer loans grew by 79% in 2024. Although the increase was mainly determined by car loan and cash loan volumes throughout the year, the volume of POS loans also increased at the end of the year, owing to seasonal factors. Meanwhile, the performing corporate loan book shrank by 96% compared to the pre-war level at the end of 2021.

FX-adjusted deposit volumes grew by 76% y-o-y. The net loan/deposit ratio was 53% at the end of the year.

At the end of 2022, the Russian operation paid back the full amount of its expiring intergroup liabilities. In addition to this, RUB 41.8 billion dividend payment has been approved by the Central Bank of Russia since September 2023.

[4] The Corporate income tax line includes the corporate income tax in the Russian segment, as well as the dividend taxes incurred at other members of OTP Group because of the Russian Group members' dividend payment.

OTP BANK ROMANIA

Performance of OTP Bank Romania:

Main components of P&L account	2023 HUF million	2024 HUF million	Change %
Profit after tax	20,120	2,050	(90)
Adjustments (after tax)	0	0	
Adjusted profit after tax	20,120	2,050	(90)
Income tax	(3,559)	(2,630)	(26)
Profit before income tax	23,679	4,680	(80)
Operating profit	20,994	9,589	(54)
Total income	68,635	33,866	(51)
Net interest income	53,865	27,046	(50)
Net fees and commissions	5,019	3,071	(39)
Other net non-interest income	9,751	3,749	(62)
Operating expenses	(47,641)	(24,277)	(49)
Total provisions	2,685	(4,909)	
Provision for impairment on loan losses	2,771	(4,714)	
Other provision	(86)	(196)	128
Main components of balance sheet (closing balances)	**2023**	**2024**	**%**
Total assets	1,600,237		
Gross customer loans	1,136,507		
Gross customer loans (FX-adjusted)	1,217,672		
Stage 1+2 customer loans (FX-adjusted)	1,152,869		
Retail loans	519,467		
Retail mortgage loans	407,306		
Retail consumer loans	89,101		
MSE loans	23,060		
Corporate loans	562,635		
Leasing	70,766		
Allowances for possible loan losses	(55,856)		
Allowances for possible loan losses (FX-adjusted)	(59,785)		
Deposits from customers	1,100,016		
Deposits from customers (FX-adjusted)	1,179,399		
Retail deposits	711,542		
Retail deposits	610,250		
MSE deposits	101,292		
Corporate deposits	467,857		
Liabilities to credit institutions	261,740		
Total shareholders' equity	192,650		
Loan Quality	**2023**	**2024**	**%/pps**
Stage 1 loan volume under IFRS 9 (in HUF million)	919,683		
Stage 1 loans under IFRS 9/gross customer loans	80.9%		
Own coverage of Stage 1 loans under IFRS 9	1.2%		
Stage 2 loan volume under IFRS 9 (in HUF million)	156,276		
Stage 2 loans under IFRS 9/gross customer loans	13.8%		
Own coverage of Stage 2 loans under IFRS 9	8.5%		
Stage 3 loan volume under IFRS 9 (in HUF million)	60,549		
Stage 3 loans under IFRS 9/gross customer loans	5.3%		
Own coverage of Stage 3 loans under IFRS 9	51.9%		
Provision for impairment on loan losses/average gross loans	(0.24%)	0.84%	1.08
Performance Indicators	**2023**	**2024**	**pps**
ROA	1.3%	0.3%	(1.0)
ROE	11.0%	2.1%	(8.9)
Total income margin	4.29%	4.18%	(0.11)
Net interest margin	3.36%	3.34%	(0.03)
Operating costs/Average assets	3.0%	3.0%	0.0
Cost/income ratio	69.4%	71.7%	2.3
Net loans to deposits (FX-adjusted)	98%		
FX rates	**2023 HUF**	**2024 HUF**	**Change %**
HUF/RON (closing)	77.0	82.4	7
HUF/RON (average)	77.3	79.2	2

On 30 July 2024, the sale of OTP Bank Romania S.A. to Banca Transilvania S.A. was completed. Simultaneously, the Romanian bank was deconsolidated, thus neither its balance sheet nor its profit was presented in the Group's balance sheet or result, starting from July. The Romanian operation generated HUF 2 billion profit after tax between January and June 2024.

STAFF LEVEL AND OTHER INFORMATION

	31/12/2023				31/12/2024			
	Branches	ATM	POS	Headcount (closing)	Branches	ATM	POS	Headcount (closing)
OTP Core	**342**	**1,877**	**156,757**	**11,257**	**317**	**1,931**	**170,708**	**11,404**
DSK Group (Bulgaria)	302	979	17,494	5,104	278	970	19,532	5,149
OTP Bank Slovenia	114	436	15,459	2,355	82	427	14,626	2,310
OBH (Croatia)	107	438	10,889	2,400	105	445	11,686	2,454
OTP Bank Serbia	156	275	20,108	2,676	155	287	24,263	2,686
Ipoteka Bank (Uzbekistan)	39	682	232	4,444	39	809	44,394	4,432
OTP Bank Ukraine (w/o employed agents)	71	165	190	2,074	70	172	350	2,129
CKB Group (Montenegro)	28	114	8,323	503	26	109	9,289	561
OTP Bank Albania	50	129	988	719	50	106	2,046	700
OTP Bank Moldova	53	154	0	867	51	161	0	875
OTP Bank Russia (w/o employed agents)	82	165	278	4,587	78	128	104	5,054
OTP Bank Romania	95	157	13,848	1,780	-	-	-	-
Foreign subsidiaries, total	**1,097**	**3,694**	**87,809**	**27,509**	**934**	**3,614**	**126,290**	**26,351**
Other Hungarian and foreign subsidiaries				640				768
OTP Group (w/o employed agents)				**39,407**				**38,523**
OTP Bank Russia – employed agents				2,018				1,694
OTP Bank Ukraine – employed agents				123				101
OTP Group (aggregated)	**1,439**	**5,571**	**244,566**	**41,547**	**1,251**	**5,545**	**296,998**	**40,317**

Definition of headcount number: closing, active FTE (full-time employee). The employee is considered as full-time employee in case his/her employment conditions regarding working hours are in line with a full-time employment defined in the Labour Code in the reporting entity's country. Part-time employees are taken into account proportional to the full-time working hours being effective in the reporting entity's country. The other Hungarian and foreign subsidiaries, and the OTP Group lines do not contain the headcount of agricultural businesses.

STATEMENT ON CORPORATE GOVERNANCE PRACTICE

Corporate governance practice

OTP Bank Plc., being registered in Hungary, has a corporate governance policy that complies with the provisions on companies of the act applicable (Civil Code). As the company conducts banking operations, it also adheres to the statutory regulations pertaining to credit institutions.

Beyond fulfilling the statutory requirements, as a listed company on the Budapest Stock Exchange (BSE), the company also makes an annual declaration on its compliance with the BSE's Corporate Governance Recommendations. After being approved by the General Meeting, this declaration is published on the websites of both the Stock Exchange (www.bet.hu) and the Bank (www.otpbank.hu).

System of internal controls

OTP Bank Plc., as a provider of financial and investment services, operates a closely regulated and state-supervised system of internal controls.

OTP Bank Plc. has detailed risk management regulations applicable to all types of risks (credit, country, counterparty, market, liquidity, operational, compliance), which are in compliance with the regulations on prudent banking operations. The Bank Group pays special attention to the management of ESG risks and the implementation of climate protection aspects in business practice. Its risk management system extends to cover the identification of risks, the assessment and analysis of their impact, elaboration of the required action plans and the monitoring of their effectiveness and results. The business continuity framework is intended to provide for the continuity of services. Developed on the basis of international methodologies, the lifecycle model includes process evaluation, action plan development for critical processes, the regular review and testing of these, as well as related DRP activities.

OTP Bank Plc.'s internal audit system is realised on several levels of control built on each other. The system of internal checks and balances includes process-integrated control, management control, independent internal audit and executive information system. The independent internal audit organisation as a key element of internal lines of defence promotes the statutory and efficient management of assets and liabilities, the defence of property, the safe course of business, the efficient operation of internal control systems, the minimisation of risks, moreover it reveals and reports deviations from statutory regulations and internal rules, makes proposal to abolish deficiencies and follows up the execution of actions. The independent internal audit organisation annually and quarterly prepares group-level reports on control actions and audit results for the executive boards. Once a year, the internal audit organisation with the prior opinion of the Audit Committee draws up, for the Supervisory Board, the Board of Directors and the Risk Assumption and Risk Management Committee, objective and independent reports in respect of the operation of risk management, internal control mechanisms and corporate governance functions. Furthermore, in line with the provisions of the Credit Institutions Act, reports, once a year, to the Supervisory Board and the Board of Directors on the regularity of internal audit tasks, professional requirements and the conduct of audits, and on the review of compliance with IT and other technical conditions needed for the audits.

In line with the regulations of the European Union, the applicable Hungarian laws and supervisory recommendations, OTP Bank Plc. operates an independent organisational unit with the task of identifying and managing compliance risks. The Compliance Directorate prepares a report quarterly to the Board of

Directors, and annually to the Supervisory Board, about the Bank's and the Bank Group's compliance activities and position.

IT Controls

Applications are developed by either in-house group resources or by third parties. OTP Bank applies administrative, logical and physical control measures commensurate with the risk in order to protect the IT systems storing and processing data, as follows:

- access to data/systems is only possible on the basis of a predefined authorisation management process that applies the principle of least privilege, ensures segregation of responsibilities, that has regular access right reviews and ensures that dismissed employees' access is revoked in a timely manner;
- user authentication, authorisation and password management processes are controlled by policies and audited;
- the systems have test and development environments with appropriate separation from the production environments that have a secure change management procedure, which ensures that program developments or modifications can only be deployed to the operational environment after proper, controlled testing and approval;
- systems are protected by appropriate network perimeter protection, various security devices and network segmentation, furthermore all network communications are protected with state-of-the-art encryption;
- the IT systems that store and process data are regularly backed up and backup media is stored in controlled premises with adequate protection for long-term retention, and the organisation carries out regular backup restore tests;
- adequate redundancy is applied for IT systems that store and process data to ensure business continuity and disaster resiliency;
- has developed DRPs and BCPs for critical systems and critical business processes, which are regularly tested and reviewed;
- the Bank collects and retains the complete log of all major IT operations and IT security relevant data processing activities and the confidentiality, availability, integrity, authenticity and non-repudiation of these audit logs are ensured;
- there is a continuous, up-to-date protection against malicious codes;
- it ensures the regular implementation of vendor patches and updates for the environments used;
- it uses a data leakage protection (DLP) solution to reduce the risk of inadvertent data loss;
- it ensures the continuous monitoring of the operation events of the physical and virtual environment system elements with automated event detection and management tools;
- the above measures are documented at an appropriate level, which ensures the traceability of the implementation of data security requirements in a transparent manner;
- it ensures permanent secure deletion of the data stored on the media, the destruction of the media and the documentation of the destruction of the media during secure operational media disposal processes;
- it enforces data protection requirements already at the design stage of the implementation of the IT systems storing and processing personal data and of the systems operational processes related to them;
- acquire and maintain ability to adequately handle application related security events (including cyber threats), entailing prevention, detection, identification, isolation, analysis, recovery and reporting;
- remote work is regulated in a controlled and documented way, remote device and user access is protected with multi-factor authentication;
- ensures IT security compliance by its managed regulative framework;
- revision and update of IT security regulations bi-yearly or in a frequency complying legislative requirements or upon major changes;
- ensures vulnerability assessments and penetration tests are carried out as planned;

- defines pools for categorization of installed software into preferred, allowed and prohibited and ensures compliance to that policy.
- it ensures that its employees have adequate knowledge of data protection requirements and provides regular data protection and information security awareness training for them.

General Meeting

The General Meeting is the supreme governing body of OTP Bank Plc. The regulations pertaining to its operation are set forth in the Company's Articles of Association, and comply fully with both general and special statutory requirements. Information on the General Meeting is available in the Corporate Governance Report.

Regulations and information to be presented in the Business Report concerning securities conferring voting rights issued by the Company and senior officials, according to the effective Articles of Association, and ownership structure

The Company's registered capital is HUF 28,000,001,000, that is twenty-eight thousand million one thousand Hungarian forint, divided into 280,000,010 that is Two hundred and eighty million and ten dematerialised ordinary shares with a nominal value of HUF 100 each, and a total nominal value of HUF 28,000,001,000, that is twenty-eight billion one thousand Hungarian forint.
The ordinary shares of the Company specified all have the same nominal value and bestow the same rights in respect of the Company.
There are no restrictions in place concerning the transfer of issued securities constituting the registered capital of the Company.
No securities with special control rights have been issued by the Company.
Special Employee Partial Ownership Plan Organization No. I. of OTP Employees and Special Employee Partial Ownership Plan Organization No. II. of OTP Employees (hereinafter referred to as: OTP SEPOPs) were established based on the decision of the Company's certain employees and executives considered as employees pursuant to the Act XLIV of 1992 on Employee Partial Ownership Plan. Management rights of OTP SEPOPs are exercised by a trust named *Alapítvány az OTP Munkavállalók Különleges Résztulajdonosi Programjáért*, founded by the same employees setting up OTP SEPOPs. The Company did not participate either in foundation or in management of OTP SEPOPs.
The Company in line with the ESOP Act initiated an employee share ownership plan having a remuneration purpose and founded OTP Bank ESOP Organization for its execution (hereinafter referred to as ESOP Organization). Pursuant to the laws, the management rights over the ESOP Organization are exercised by a law firm, the so called trustee. In the case of the ESOP Organization Szűcs Law Firm is entitled to exercise the authorities of the trustee. The Company participated in the foundation of the ESOP Organization, however, after its foundation it cannot participate in its management, and according to the laws, it is not entitled to either give orders or to recall the trustee.

Rules on the restrictions of the voting rights:
The Company's ordinary shares confer one vote per share.
An individual shareholder or group of shareholders may not exercise voting rights in respect of in an extent exceeding 25%, or – if the voting rights of another shareholder or group of shareholders exceed 10% – exceeding 33% of the total voting rights represented by the shares conferring voting rights at the Company's General Meeting.
The shareholder is obliged to notify the Company's Board of Directors without delay if the shareholder directly or indirectly, or together with other shareholders in the same group of shareholders, holds more than 2% of the voting rights represented by the shares conferring voting rights at the Company's

General Meeting. Concurrently with this, the shareholder is obliged to designate the shareholders through which the indirect voting right exists, or the members of the group of shareholders. In the event of a failure to provide such notification, or if there are substantive grounds for assuming that the shareholder has made a misleading declaration regarding the composition of the shareholder group, then the shareholder's voting right shall be suspended and may not be exercised until the shareholder has met the above obligations. The notification obligation stipulated in this paragraph and the related legal consequences are also incumbent upon individuals who are classified or may be classified as the Company's shareholders under Article 61 of the Capital Markets Act. The Company must also be provided with proof of the conditions for exemption from the notification obligation in accordance with Section 61 (7)–(8) and (11) and Section 61 (10), (11a) and (12), of the Capital Markets Act.

Shareholder group: the shareholder and another shareholder, in which the former has either a direct or indirect shareholding or has an influence without a shareholding (collectively: a direct and/or indirect influence); furthermore: the shareholder and another shareholder who is exercising or is willing to exercise its voting rights together with the former shareholder, regardless of what type of agreement between the participants underlies such concerted exercising of rights. For determining the existence and extent of the indirect holding, the rules of the Credit Institutions Act relating to the calculation of indirect ownership shall be applied.

If the voting rights that may be exercised by a shareholder group exceed the threshold stipulated above, the voting rights shall be reduced in such a way that the voting rights relating to the shares most recently acquired by the group of shareholders shall not be exercisable.

If there are substantive grounds to presume that the exercising of voting rights by any shareholder or shareholders might result in a breach of the rules of the Capital Markets Act relating to the acquisition of a controlling interest, the Board of Directors' authorised representative responsible for the registration of shareholders at the venue of the General Meeting, or the Chairman of the General Meeting, may exclude the affected shareholders from attending the General Meeting or exercising voting rights.

The General Meeting has exclusive authority with respect to the following matters:

- changes to the rights associated with specific series of shares, or the transformation of certain categories or classes of shares; (qualified majority)
- the decision regarding the delisting of the shares (qualified majority). When making the decisions, shares embodying multiple voting rights shall represent one share.

The Company is not aware of any kind of agreements among the owners that could give rise to the restriction of the transfer of issued securities and/or the voting rights.

Rules on the appointment and removal of executive officers, and rules on amendment of the Articles of Association:

The Board of Directors has at least 5, and up to 11 members.

When making the decisions, shares embodying multiple voting rights shall represent one share. The members of the Board of Directors are elected by the General Meeting based on its decision uniformly either for an indefinite period or for five years; in the latter case the mandate ends with the General Meeting concluding the fifth financial year following the election. The mandate of a member elected during this period expires together with the mandate of the Board of Directors.

The Board of Directors elects a Chairman and may elect one or more Deputy Chairmen, from among its own members, whose period of office shall be equal to the mandate of the Board of Directors. The Chairman of the Board of Directors is also the Chief Executive Officer (Chairman & CEO) of the Company, unless the Board of Directors decides within its competence that the position of Chairman of the Board of Directors and the Chief Executive Officer of the Company are held by separate persons.

The membership of the Board of Directors ceases to exist by
a) expiry of the mandate,
b) resignation,
c) recall,
d) death,
e) the occurrence of grounds for disqualification as regulated by law,
f) termination of the employment of internal (executive) Board members.

The General Meeting has exclusive authority with respect to the following matters:

- the recall of members of the Board of Directors, the Supervisory Board and Audit Committee, and of the auditor; (qualified majority)
  More than one third of the members of the Board of Directors and the non-executive members of the Supervisory Board may be recalled within a 12-month period only if any shareholder holds more than 33% of the shares issued by the Company, which have been obtained by the shareholder by way of a public purchase offer.
- except in the cases referred by these Articles of Association to the authority of the Board of Directors, the establishment and amendment of the Articles of Association; (qualified majority); the General Meeting decides on proposals concerning the amendment of the Articles of Association – based on a resolution passed by shareholders with a simple majority – either individually or en masse.

The Board of Directors is obliged to

- prepare the Company's financial statements in accordance with the Accounting Act, and make a proposal for the use of the profit after taxation;
- prepare a report once a year for the General Meeting, and once every three months for the Supervisory Board, concerning management, the status of the Company's assets and business policy;
- provide for the proper keeping of the Company's business books;
- perform the tasks referred to its authority under the Credit Institutions Act, in particular:
  - ensuring the integrity of the accounting and financial reporting system;
  - elaborating the appropriate strategy and determining risk tolerance levels for each business unit concerned;
  - setting risk assumption limits;
  - providing the necessary resources for the management or risk, the valuation of assets, the use of external credit ratings and the application of internal models.

The following, in particular, come under the exclusive authority of the Board of Directors:

- election of the Chairman & Chief Executive Officer of the Company, and exercising employer's right in respect thereof;
- election of one or more Deputy Chairmen of the Board of Directors;
- determination of the annual plan;
- the analysis and assessment of the implementation of business-policy guidelines, on the basis of the Company's quarterly balance sheet;
- decisions on transactions referred to the authority of the Board of Directors by the Company's organisational and operational regulations;
- decision on launching, suspending, or terminating the performance of certain banking activities within the scope of the licensed activities of the Company;
- designation of the employees entitled to sign on behalf of the Company;
- decision on the increasing of registered capital at the terms set out in the relevant resolution of the General Meeting;
- decision to acquire treasury shares at the terms set out in the relevant resolution of the General Meeting;
- decision on approving internal loans in accordance with the Credit Institutions Act;
- decision on the approval of regulations that fundamentally determine banking operations, or are referred to its authority by the Credit Institutions Act.

The following shall qualify as such regulations:
- the collateral evaluation regulations,
- the risk-assumption regulations,
- the customer rating regulations,
- the counterparty rating regulations,
- the investment regulations,
- the regulations on asset classification, impairment and provisioning,
- the organisational and operational regulations, which contain the regulations on the procedure for assessing requests related to large loans,
- the regulations on the transfer of signatory rights;

- the decision on approving the Rules of Procedure of the Board of Directors;
- decision on steps to hinder a public takeover procedure;
- decision on the acceptance of a public purchase offer received in respect of treasury shares;
- decision on the commencement of trading in the shares in a regulated market (flotation);
- decision on the cessation of trading in the shares in a given regulated market, provided that the shares are traded in another regulated market (hereinafter: transfer).

The Board of Directors is exclusively authorised to:
- decide, in the cases specified in the Civil Code, on acceptance of the Company's interim balance sheet, subject to the prior approval of the Supervisory Board;
- decide, instead of the General Meeting, to pay an advance on dividends, subject to the preliminary approval of the Supervisory Board;
- make decisions regarding any change in the Company's name, registered office, permanent establishments and branches, and in the Company's activities – with the exception of its core activity – and, in relation to this, to modify the Articles of Association should it become necessary to do so on the basis of the Civil Code or the Articles of Association;
- make decision on mergers (if, according to the provisions of the law on the transformation, merger and demerger of legal entities, the approval of the General Meeting is not required in order for the merger to take place).

The Board of Directors directly exercises employer's rights in respect of the Chairman & CEO. The person affected by a decision may not participate in the decision making. Employer rights in respect of the executive directors of the Company are exercised by the Board of Directors through the Chairman & CEO, with the proviso that the Board of Directors must be notified in advance of the appointment and dismissal of the Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the Chief Executive Officer and by the senior company employees defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors. If the Chairman of the Board of Directors and the CEO are different persons, the employer rights in respect of the other executive directors of the Company (CEO, deputy CEOs) are exercised by the Board of Directors through the Chairman of Board of Directors, with the proviso that the Board of Directors shall be notified in advance of the appointment and dismissal of the CEO and Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the persons defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors.
The Board of Directors may delegate, to individual members of the Board of Directors, to executive directors employed by the Company, and to the heads of the individual service departments, any task that does not come under the exclusive authority of the Board of Directors in accordance with these Articles of Association or a General Meeting resolution.

The Company may acquire treasury shares in accordance with the rules of the Civil Code. The prior authorisation of the General Meeting is not required for the acquisition of treasury shares if the acquisition of the shares is necessary in order to prevent a direct threat of severe damage to the Company (this provision is not applicable in the event of a public purchase offer aimed at buying up the Company's shares), as well as if the Company acquires the treasury shares in the context of a judicial procedure aimed at the settlement of a claim to which the Company is entitled, or in the course of a transformation.

The Company has not made agreements in the meaning of points (j) and (k) in paragraph 95/A of Act No. C of 2000 on Accounting.

Ownership structure of OTP Bank Plc.:

Description of owner	Total equity					
	1 January 2024			31 December 2024		
	Ownership share	Voting rights[1]	Quantity	Ownership share	Voting rights[1]	Quantity
Domestic institution/company	31.40%	31.46%	87,914,205	31.57%	32.39%	88,395,584
Foreign institution/company	54.43%	54.54%	152,405,042	54.53%	55.94%	152,679,265
Domestic individual	12.93%	12.96%	36,217,730	10.31%	10.58%	28,878,581
Foreign individual	0.48%	0.48%	1,349,320	0.36%	0.37%	998,943
Employees, senior officers	0.48%	0.48%	1,338,715	0.51%	0.53%	1,435,703
Treasury shares[2]	0.20%	0.00%	572,746	2.52%	0.00%	7,049,823
Government held owner	0.05%	0.05%	139,036	0.05%	0.05%	139,036
International Development Institutions	0.01%	0.01%	28,603	0.00%	0.00%	3,251
Other[3]	0.01%	0.01%	34,613	0.15%	0.15%	419,824
Total	**100.00%**	**100.00%**	**280,000,010**	**100.00%**	**100.00%**	**280,000,010**

[1] Voting rights in the General Meeting of the Issuer for participation in decision-making.
[2] Treasury shares do not include the OTP shares held by ESOP (OTP Bank Employee Stock Ownership Plan Organization). Pursuant to Act V of 2013 on the Civil Code, OTP shares held by the ESOP are not classified as treasury shares, but the ESOP must be consolidated in accordance with IFRS 10 Consolidated Financial Statements standard. On 31 December 2024 ESOP owned 11,965,796 OTP shares.
[3] Non-identified shareholders according to the shareholders' registry.

Number of treasury shares held in the year under review (2024):

	1 January	31 March	30 June	30 September	31 December
OTP Bank	572,746	1,452,570	3,443,352	4,762,756	7,049,823
Subsidiaries	0	0	0	0	0
Total	**572,746**	**1,452,570**	**3,443,352**	**4,762,756**	**7,049,823**

Shareholders with over/around 5% stake as at 31 december 2024:

Name	Nationality[1]	Activity[2]	Number of shares	Ownership[3]	Voting rights[3, 4]	Notes[5]
MOL (Hungarian Oil and Gas Company Plc.)	**D**	**C**	**24,000,000**	**8.57%**	**8.79%**	**–**
Groupama Group	**F/D**	**C**	**14,260,181**	**5.09%**	**5.22%**	**–**
Groupama Gan Vie SA	F	C	14,140,000	5.05%	5.18%	–
Groupama Biztosító Ltd,	D	C	120,181	0.04%	0.04%	–

[1] Domestic (D), Foreign (F).
[2] Custodian (CU), Public Institution (PU), International Development Institutions (ID), Institutional (I), Company (C), Private (PR), Employee or senior officer (E).
[3] Rounded to two decimals.
[4] Voting rights in the General Meeting of the Issuer for participation in decision-making.
[5] Eg, professional investor, financial investor etc.

Senior officers, strategic employees and their shareholding of OTP shares as at 31 December 2024:

Type[1]	Name	Position	Commencement date of the term	Expiration/termination of the term	Number of shares
IG	dr. Sándor Csányi[2]	Chairman and CEO	15/05/1992	2026	76,887
IG	Tamás György Erdei	Deputy Chairman	27/04/2012	2026	59,685
IG	Gabriella Balogh	member	16/04/2021	2026	27,393
IG	Mihály Baumstark	member	29/04/1999	2026	58,800
IG	Péter Csányi	member, Deputy CEO	16/04/2021	2026	49,429
IG	dr. István Gresa	member	27/04/2012	2026	195,058
IG	Antal György Kovács[3]	member	15/04/2016	2026	114,940
IG	György Nagy[4]	member	16/04/2021	2026	13,000
IG	dr. Márton Gellért Vági	member	16/04/2021	2026	22,600
IG	dr. József Zoltán Vörös	member	15/05/1992	2026	204,914
IG	László Wolf	member, Deputy CEO	15/04/2016	2026	554,412
FB	Tibor Tolnay	Chairman	15/05/1992	2026	54
FB	dr. József Gábor Horváth	Deputy Chairman	19/05/1995	2026	0
FB	Klára Bella	member	12/04/2019	2026	491
FB	dr. Tamás Gudra	member	16/04/2021	2026	0
FB	András Michnai	member	25/04/2008	2026	1,410
FB	Olivier Péqueux	member	13/04/2018	2026	0
SP	András Becsei	Deputy CEO			11,649
SP	László Bencsik	Deputy CEO			16,003
SP	György Kiss-Haypál	Deputy CEO			15,995
SP	Imre Bertalan	MC member			0
SP	dr. Bálint Csere	MC member			12,983
Total No. of shares held by management					**1,435,703**

[1] Board Member (IG), Supervisory Board Member (FB), Employee in strategic position (SP).
[2] Number of OTP shares owned by Dr. Sándor Csányi, Chairman and CEO, directly or indirectly: 5,276,887.
[3] Number of OTP shares owned by Antal György Kovács, Member of Board of Directors, directly or indirectly: 119,240.
[4] Number of OTP shares owned by György Nagy, Member of Board of Directors, directly or indirectly: 980,000.

Committees[5]

Members of the Board of Directors

Dr. Sándor Csányi – Chairman

Mr. Tamás György Erdei – Deputy Chairman

Ms. Gabriella Balogh

Mr. Mihály Baumstark

Mr. Péter Csányi

Dr. István Gresa

Mr. Antal György Kovács

Mr. György Nagy

Dr. Márton Gellért Vági

Dr. József Zoltán Vörös

Mr. László Wolf

Members of the Supervisory Board

Mr. Tibor Tolnay – Chairman

Dr. József Gábor Horváth – Deputy Chairman

Ms. Klára Bella

Dr. Tamás Gudra

Mr. András Michnai

Mr. Olivier Péqueux

Members of the Audit Committee

Dr. József Gábor Horváth – Chairman

Mr. Tibor Tolnay – Deputy Chairman

Dr. Tamás Gudra

Mr. Olivier Péqueux

The résumés of the committee and board members are available in the Corporate Governance Report/Annual Report.

[5] Personal changes can be found in the "Personal and organizational changes" chapter.

Auditor

On 26 April 2024, concerning the audit of OTP Bank Plc.'s separate and consolidated annual financial statements in accordance with International Financial Reporting Standards for the year 2024, the Annual General Meeting elected Ernst & Young Ltd. (001165, H-1132 Budapest, Váci út 20.) as the Company's auditor from 1 May 2024 until 30 April 2025.

Operation of the executive boards

OTP Bank Plc. has a dual governance structure, in which the Board of Directors is the Company's executive management body in its managerial function, while the Supervisory Board is the management body in its supervisory function of the Company. It controls the supervision of the lawfulness of the Company's operation, its business practices and management, performs oversight tasks and accepts the provisions of the Bank Group's Remuneration Policy. The effective operation of Supervisory Board is supported by the Audit Committee, as a committee, which also monitors the internal audit, the risk management, the reporting systems and the activities of the auditor.
In order to assist the performance of the governance functions the Board of Directors founded and operates, as permanent or other committees, such as the Management Committee, the Executive Steering Committee, the Remuneration Committee, the Nomination Committee and the Risk Assumption and Risk Management Committee.
To ensure effective operation OTP Bank Plc. also has a number of further permanent committees. OTP Bank Plc. gives an account of the activities of the executive boards and the committees every year in its Corporate Governance Report.
The Board of Directors held 6, the Supervisory Board held 7 meetings, while the Audit Committee held 2 meetings in 2024. In addition, resolutions were passed by the Board of Directors on 149, by the Supervisory Board on 73 and by the Audit Committee on 24 occasions by written vote.

Policy of diversity

OTP Bank Plc. determines and regulates the criteria for the selection of senior executives in line with European Union as well as domestic legal requirements and directives fundamentally determining the operation of credit institutions.
When designating members of the management bodies (Board of Directors, Supervisory Board) as well as appointing members of the Board of Directors and administrative members (Management), OTP Bank Plc. considers the existence of professional preparation, the high-level human and leadership competence, the versatile educational background, the widespread business experience and business reputation of the utmost importance, at the same time, it is also highly committed to taking efficient measures in order to ensure diversity with regard to corporate operation, including the gradual improvement in women's participation rate.
OTP Bank Plc.'s Nomination Committee continuously keeps tracking the European Union and domestic legislation relating to women's quota on its agenda, in that when unambiguously worded expectations are announced, it promptly takes the necessary measures.
In accordance with OTP Bank Plc.'s currently approved strategy, the goal is to have at least one female member in both the Bord of Directors and the Supervisory Board.
It is important to note, however, that, as a public limited company, the selection of the members of the management bodies falls within the exclusive competence of the General Meeting upon which – beyond its capacity to designate enforcing the above aspects to maximum effect – OTP Bank Plc. has no substantive influence.
According to OTP Bank Plc.'s Articles of Association, a Board of Directors comprising 5–11 members and a Supervisory Board comprising 5–9 members are set up at OTP Bank Plc.
Currently the Board of Directors operates with 11 members and has one female member, the Supervisory Board comprises 6 members and has one female member. The management

of OTP Bank Plc. currently comprises 6 members and has no female member.

Fight against corruption and against the practice of bribery

The Code of Ethics (https://www.otpbank.hu/static/portal/sw/file/OTP_EtikaiKodex_EN.pdf), the Partner Code of Ethics (https://www.otpbank.hu/static/portal/sw/file/OTP_Partneri_EtikaiKodex_EN.pdf) published in 2023 and the Anti-Corruption Policy of OTP Bank Group, approved in 2019, contains provisions on the fight against corruption and against the practice of bribery, as well as the enforcement of legal, fair and ethical conduct (https://www.otpgroup.info/ethical-declaration). As it can be read in the foreword of the Code and the Anti-Corruption Policy as well, the OTP Bank Plc. and its management have adopted the principle of zero tolerance towards corruption and bribery, taking a definite stance against all forms of corruption and giving full support to the fight against corruption. In addition, the Code states that "As an ethical and compliant institution, the Bank and its management are fully committed to ensuring observance of all relevant legislation, including anti-corruption statutes."

The OTP Bank Plc. has set up an ethics reporting system (whistleblowing), which is for the reporting and the handling of the reports on suspected or actual violation of the values set forth in the Code of Ethics, where anonymous reporting of ethics issues is also possible. The OTP Bank Plc. conducts inquiries for the purpose of detecting, preventing anomalies in connection with reports made or anomalies it became aware of otherwise.

In 2024, a total of 200 reports were received through the ethics Whistleblowing System of OTP Bank Plc., of which 44 reports were deemed necessary to conduct ethics proceedings. Ethical breaches were identified in 12 cases.

The OTP Bank Plc. has created and maintains its Code of Ethics to keep reputational risk and financial losses, which may incur in relation to corruption, bribery and discrimination, on a minimum level. Both employees and newcomers receive education on the Code of Ethics, and in addition, the acceptance to be bound by it is a prerequisite for their employment. In addition, all business partners and clients are communicated about the Anti-Corruption Policy and procedures through the Code of Ethics and Anti-Corruption Policy published publicly on the OTP Bank Plc.'s website and from 2023 the Partner Code of Ethics has been published on the Bank's website as well.

The Anti-Corruption Policy stipulates that, in view of the fact that existing and established relationships with contractual partners also contain the possibility of corruption, the OTP Bank Plc. will act prudently in its dealings with contractors, in particular in the tendering and preparation process, to minimise the risk of corruption. The OTP Bank Plc. establishes relationships with its contractual partners based on an assessment of professionalism, competence and competitiveness, and does not apply other non-professional selection criteria that contain the possibility of corruption. Based on the Compliance's proposal, the prohibition of corruption will be reflected in the contractual and regulatory documents used by the OTP Bank Plc. in a clearer and well-defined manner from 2023 onwards, through the inclusion of anti-corruption clauses in the business rules and standard contracts. The clause will state from the very beginning of the business relationship that the contracting partner accepts OTP Bank Plc.'s anti-corruption principles, including the prohibition of corruption and the consequences of breaching this prohibition, which can even be termination of contract.

Any requests from third parties affecting human rights are treated by the OTP Bank Plc. as a priority.

We manage the risks regarding the fight against corruption and bribery within the framework of our operational risk management process. Our quarterly compliance reports cover the changes in risks as well as the steps necessary steps to manage them. The reports are presented to the Executive Steering Committee and the Board of Directors; the annual report is also submitted to the Supervisory Board.

Non-financial performance indicators

- **Internal audit:** 208 closed audits, 1,193 recommendations, 1,193 accepted recommendations.
- **Compliance with Budapest Stock Exchange (BSE) Recommendations (yes/no ratio):** 72 yes, 0 no.
- **Compliance:** 11 closed data- and consumer protection related investigations by the Compliance.
- **Bank security investigations, reports:** in 2024, we made 1,049 reports, 20 additions to reports and 356 notifications. Of these reports, 889 were on suspicion of fraud, 38 on suspicion of money laundering and 122 on suspicion of other crimes.
  In terms of financial abuse, there is an increasing trend in housing loans, which amounted to approximately HUF 41 million in 2024. A detailed comparison of the development of losses from credit fraud with the data of 2023 shows that in 2023 the loss from personal loan fraud was HUF 22 million, while in 2024 it increased to HUF 39 million. In 2023, the loss due to fraud was HUF 852 thousand, while in 2024 it increased to HUF 1.2 million.
  In 2024, there were no losses related to overdrafts, baby loans, home loans and CSOK applications.
  Considering corporate credit fraud in the MSE and MLE sectors, the bank's losses amounted to HUF 4.7 billion in 2023, which decreased to HUF 1.2 billion in 2024.
  In the area of online fraud against customers, as a result of the Bank's protective measures, the damage caused by the misuse of cash flows to the detriment of customers decreased by 32% to HUF 7.2 billion in 2024 compared to the data for 2023, when the damage to customers exceeded HUF 10 billion.
  In addition, the operational fraud prevention measures and monitoring activities prevented customer losses of HUF 21.7 billion, which is more than three times the previous year's figure of HUF 6.5 billion.
  Compared to the data of 2023, in contrast to other domestic banks, a decrease can be observed in the area of bank card fraud, both in terms of the number of fraud attempts and the value of successful fraud.
  In 2024, the value of successful bank card misuse was HUF 3.5 billion, of which the value of successful transactions with OTP-issued cards was HUF 3.2 billion.
  As a result of the newly introduced rules and improvements, the ratio of bank card fraud to sales has decreased compared to 2023, and is once again well below the European average published by Mastercard: OTP Bank 0.0253%, European average 0.0407%.
- **Ethics issues:** 200 ethics reports, establishing ethics offense in 12 cases.

OTP GROUP'S SUSTAINABILITY REPORT 2024

1. General information

1.1 Basis for preparation of the report

General basis for the preparation of the sustainability statement ESRS 2 BP-1

OTP Bank Plc. prepared its sustainability statement[6] for the year 2024 (01.01.2024-31.12.2024) on a consolidated basis, in accordance with the European Sustainability Reporting Standards (hereinafter referred to as: ESRS), including disclosures under Article 8 of EU Regulation 2020/852 (hereinafter referred to as Taxonomy Regulation). The scope of consolidation is the same as that of the financial statements. The E1-6 disclosure requirement data point 50.b. differs from this, as it pertains to assets under operational control but not consolidated in the financial statements, in compliance with ESRS expectations. The consolidation of a subsidiary begins when OTP Group gains control and ends when the Group loses control.

Corporate names used in the report:

- OTP Bank Plc.: OTP Bank or Bank
- Consolidated group of companies: OTP Group, Banking Group, Group
- Subsidiaries are referred to without their legal form

Under Article 19a(9) or Article 29a(8) of Directive 2013/34/EU, the following subsidiaries are exempt from individual or consolidated sustainability reporting:

- DSK Bank AD[7]
- OTP banka d.d.[8]
- OTP banka Hrvatska dioničko društvo[9]

OTP Group has not omitted any specific information corresponding to intellectual property, know-how, or innovation results, and has not utilized the exemption from disclosing information on imminent developments or matters under negotiation.

Section 134/J (1) of the Hungarian Accounting Law requires that the Company must prepare its consolidated business report including the consolidated sustainability statement in the electronic reporting format (XHTML) set out in Commission Delegated Regulation (EU) 2019/815(ESEF Regulation), and the sustainability disclosures defined by the ESEF taxonomy, including those required according to article 8 of Regulation (EU) 2020/852, must be tagged in the consolidated sustainability statement using the XBRL markup language. Given that the ESEF taxonomy for sustainability reporting has not been adopted yet, the Company, was unable to carry out the XBRL tagging.

Value Chain Management

The materiality assessment of impacts, risks, and opportunities for the upstream and downstream value chain extended comprehensively to the covered corporate group to the extent of identifying material impacts, risks, and opportunities. The extent to which policies, actions, targets, and metrics cover the value chain is presented at the relevant disclosure requirements. Regarding metrics, disclosure requirement E1-6 includes information on the value chain: gross and total GHG emissions for Scopes 1, 2 and 3.

In case of E3 Water and Marine Resources and E4 Biodiversity and Ecosystem, the development and reporting of metrics covering the value chain is necessary and planned in the future. Information on the value chain in this report is limited, with plans to gradually acquire such information from 2025. OTP Group expects that the range of publicly available

[6] Sustainability Report according to Act C of 2000 on Accounting.
[7] DSK Group and subsidiaries.
[8] OTP Bank Slovenia and subsidiaries.
[9] OTP Bank Croatia and subsidiaries.
[10] Greenhouse Gas.

information will expand in this regard in line with legal requirements, and the information available to the corporate group will also increase due to expectations.

Disclosures on Specific Circumstances ESRS 2 BP-2

Time periods defined by OTP Group

- Short-term: one year
- Medium-term: 2 years from the end of the short-term period (financial planning period)
- Long-term: beyond 3 years, starting from the end of the medium-term period.

Financial planning is conducted for the three years following the current year, which aligns with the defined time periods and explains the deviation from the long-term definition in section 6.4 of ESRS 1.

Information on estimates using indirect sources related to the value chain, the basis of preparation, the level of accuracy, and where applicable measures planned to improve accuracy of these estimations, are presented alongside the relevant metric (@1.5 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement and general reporting policy) in the report.

Identified significant measurement uncertainties, information on the sources of measurement uncertainties, and assumptions, approximations, and judgments used in the measurement, are also presented alongside the relevant quantitative metrics. Forward-looking information always carries a certain degree of uncertainty, which is not separately disclosed. To ensure the reliability of the report, the aim is to avoid presenting information affected by significant uncertainty – if this is not possible or advisable due to ESRS requirements, the fact of significant uncertainty is disclosed.

We will publish revised comparative data due to future methodological changes to the figure if it can be produced at reasonable cost and, under reasonable assumptions, is capable of influencing the user's decisions based on the Sustainability Statement. We will not publish a modification retroactively as a result of a change in estimate.

A previous period error is considered material based on individual judgment it is reasonable to assume that it is capable of influencing the decisions of the users of the sustainability statements. Restatement has been made in chapter 2.1.1 Disclosure under EU Taxonomy, details are to be seen in the chapter.

GRI Standards 2021, the GRI G4 Financial Services Sector indicators and own indicators are used in the sustainability statement as entity specific disclosures. Their application is indicated by the notation used in these standards and our own notation, their list can be found in the @6. ESRS Index. It is indicated in the @ESRS SBM-3 disclosure for which material topics their use was deemed necessary.

1.2 Governance

Role of Governing Bodies ESRS 2 GOV-1

Composition and Diversity

The administrative, executive, and supervisory bodies of OTP Group are the Board of Directors, the Supervisory Board, and the Audit Committee of OTP Bank Plc. Additionally, there are permanent and special committees (17 committees) established by the Board of Directors of OTP Bank, which are listed in the Corporate Governance Report.

Composition and diversity of the members of the administrative, executive, and supervisory bodies:

	OTP Bank			
	Board of Directors	Supervisory Board	Audit Committee	Additional Committee
Number of executive members (person)[11]	11	0	0	46
Number of non-executive members (person)	0	6	4	77
Total number of members (persons)	**11**	**6**	**4**	123
Number of employee representative members (persons)[12]	0	2	0	1
Proportion of men	91%	83%	100%	89%
Proportion of women	9%	17%	0%	11%
Proportion of independent members in the Supervisory Board	–	67%	–	–

The professional experience of the members of the Supervisory Board and the Board of Directors (governing bodies) is presented in the @Appendix. For governing bodies, the members must be collectively capable (collective suitability) of making informed decisions on matters within the committee's decision-making authority. However, it is not required that all members possess high-level knowledge in all matters within the governing body's authority, as far as the composition of the body ensures appropriate professional diversity and thus the collective suitability of the body. The suitability of the members of the governing bodies is reviewed at least once a year. The primary consideration in forming the composition of the standing committees is to elect members who have in-depth knowledge of the matters and professional issues within the committee's decision-making authority, or whose specialized expertise is essential for making certain decisions within the committee's authority.

Roles Related to Sustainability

OTP Bank's **ESG organization** was established by the decision of the Board of Directors in 2021. The ESG Committee and the ESG Sub-Committee were included as standing committees in the Organizational and Operational Regulation, and the tasks, responsibilities, and reporting obligations of the relevant organizational units and departments were defined.

The organization has multiple levels:

- The main decision-maker is the Board of Directors.
- The ESG Committee is a standing committee, established by the Board of Directors. Its task is to formulate the ESG strategy, plans, and policies of OTP Bank and the Banking Group, and to support the governing bodies in performing ESG tasks. The ESG Committee reviews all ESG-related proposals before they are submitted to the governing body. The ESG Committee, together with the relevant departments, is responsible for identifying ESG risks, formulating strategies, plans, and policies, setting and evaluating goals and performance, and assessing the consequences of climate-related and environmental risks, as well as social and governance risks, thereby assisting the Board of Directors in performing its ESG tasks. The Chairman of the ESG Committee is appointed by the Chairman-CEO from among the members of the Board of Directors, and its members are the Deputy CEOs and elected directors of OTP Bank.
- The ESG Sub-Committee is the standing decision-preparation forum of the ESG Committee, that performs coordination, consultation, and implementation duties in the context of its technical support work. The head of the Sub-Committee, who is also the head of ESG business transformation, is the Managing Director of the Green Program Directorate.
- The Board of Directors receives a comprehensive quarterly report on the topics discussed at the quarterly meetings of the ESG Committee and the progress of the action plan in response to the MNB Green Recommendation, as well as a written

[11] For the Board of Directors performs the executive function in corporate law, so both internal and external members perform executive functions.
[12] The Work Council delegates members based on the Civil Code, and the members of the Works Council are elected by the employees of OTP Bank Plc. from among themselves.

report on the annual progress of the ESG strategy. The Supervisory Board receives a written report on the annual report of the Board of Directors.

The Board of Directors of OTP Bank approved the Group's ESG strategy in 2021 (see @Strategy for more details).

ESG coordination is also ensured at the subsidiary banks.

Security issues, including information security, fall within the scope of the **Security Directorate.** The Security Directorate is responsible for developing and enforcing OTP Bank's Security Policy, professionally directing security activities, developing and implementing procedures, and overseeing the security activities of the Group members. The Security Directorate supports the Anti-Money Laundering Committee in controlling anti-money laundering activities. The head of the Security Directorate supervises the execution of the bank security tasks.

The Security Directorate prepares an Annual Report on the security situation of OTP Group, the enforcement of the Security Policy, changes in risks, and the steps necessary to manage these risks for the Board of Directors, and the Supervisory Board.

To ensure the sustainability expertise of the members of the governing bodies, regular training for the members is provided. In 2024 such training was conducted, where an external expert in ESG governance and the head of the Green Program Directorate (Vice-Chair of the ESG Committee) gave a presentation on OTP Bank's ESG-related activities. The materials from the presentations are continuously accessible to the members of the governing bodies through the e-learning system.

In 2023, targeted ESG training was provided to the executive and strategic-level leaders of the Banking Group, whereby nearly 360 leaders of OTP Group received the e-learning tailored for the target group. The material covered the general basics of ESG, legal and regulatory requirements, business aspects, risk management, human resources topics, and the necessity of avoiding greenwashing.

The collective suitability assessment of the members of the governing bodies includes questions regarding whether the leader has the skills to identify and exploit opportunities related to the company's sustainability.

The Nomination Committee reports annually to the Board of Directors and the Supervisory Board on the individual and collective suitability of the members of the governing bodies, including the presence of sustainability-related skills.

When electing members of the ESG Committee, as a standing committee, it is ensured that they have in-depth knowledge of the topics within the committee's authority, as described above. The Committee's rules of procedure state that external experts may be involved in forming its opinion.

Role of Governing Bodies in Business Conduct

ESRS G1 GOV-1

The Supervisory Board, the Board of Directors, and among their committees, the Ethics Committee, play a prominent role in ensuring ethical business conduct and compliance. For the Banking Group, a key element of responsible business conduct is the fight against money laundering, in which the Anti-Money Laundering Committee plays an important role.

In terms of compliance, the governance and organizational responsibility lie with the Board of Directors and the Supervisory Board.

The **Board of Directors** approved the Code of Ethics, which summarizes the principles and guidelines of ethical business conduct, and the Compliance Policy.

The **Supervisory Board** – as a body elected by the General Meeting – performs the oversight of the Company's management, business activity and legal operation, and fulfils the responsibilities assigned to it by the Credit Institutions Act.[13]

The Bank develops and enforces conflict of interest and ethical rules, and it requires firm action from all leaders and supervisory bodies against the violations of those rules.

[13] Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises.

The tasks of OTP Bank's **Ethics Committee** are partly limited to OTP Bank and are partly group wide. At group level, the Commission acts as a secondary body in cases that can be interpreted at group level, and in cases communicated via the ethics/infringement reporting line and primarily managed by OTP Bank's Ethics Department. The Committee investigates reports in a separate procedure and makes second-level decisions. The Committee's objective is to provide clear guidance on following ethical behaviour through its interpretations and opinions provided for general and specific matters. The Committee can provide guidance at the group level.

The Committee on the Prevention of Money Laundering (PMB) is a standing committee established by the Board of Directors that makes decisions about the sustainability of a business relationship or the approval of the establishment of a business relationship that involve customers concerned with the arising of specific money laundering risks. As part of the system for preventing, detecting, investigating, and responding to corruption and bribery allegations and cases, the Committee discusses reports on the implementation of bank- and group-level anti-money laundering and counter-terrorism financing (AML/CFT) policies, procedures, and controls, particularly those proposed by the AML officer. It also discusses the risk management measures necessary for quickly and effectively addressing any identified deficiencies. The Committee discusses and recommends the Bank's and the Group's internal risk assessment on anti-money laundering to the Board of Directors for deliberation. The Committee reports annually to the Board of Directors on its activities, internal and external investigations ordered, their resource requirements, and budget. The PMB sends summaries and minutes of its quarterly meetings to the Supervisory Board for information.

The expertise of the members of the Board of Directors and the Supervisory Board in business conduct is ensured by mandatory annual ethics training and supplementary ethical leadership training (please refer to @4.1 Corporate Governance), just as the expertise of the Banking Group's employees is ensured by mandatory training prescribed by regulators. When forming the composition of standing committees, the primary consideration is to elect members who have in-depth knowledge of the matters and professional issues within the committee's decision-making authority or whose specialized expertise is essential for making certain decisions within the committee's authority.

Information provided to Governing Bodies on Sustainability
ESRS 2 GOV-2

The practice of informing about the impacts, risks, and opportunities identified during the materiality assessment varies by topic. The information is not communicated through a separate channel but is integrated into the sector-specific information practices.

Area	Reporting practices	Significant impact, risk, opportunity,[14] addressed by governing body in 2024
Regular reporting to the governing body		
ESG Committee (detailed tasks in @Governance)	The ESG Committee reviews in advance all ESG-related proposals submitted to the governing body. The Committee meets quarterly. The Board of Directors receives a comprehensive report on the topics discussed at the ESG Committee's quarterly meetings and on the progress of the action plan in response to the MNB Green Recommendation[15]. Additionally, the Board of Directors receives a written report on the annual progress of the ESG strategy. The Supervisory Board receives a written report on the annual report of the Board of Directors.	The ESG Committee as the highest-level body addressed the following: climate change mitigation, climate change adaptation, risks and impacts of energy, and diversity of employees. In addition to it informed the Board of Directors and the Supervisory Board on: climate change mitigation, climate change adaptation, and lending-related opportunities concerning energy.
Compliance Directorate	The compliance officer reports on compliance to the Bank's Board of Directors quarterly and to the Supervisory Board annually.	Measures against workplace violence and harassment Data protection* Access to financial products and services Corporate culture, compliance, anti-money laundering Corruption and bribery
Security Directorate	The Security Directorate prepares an annual report on the security situation for the Board of Directors and the Supervisory Board.	Information security*
Human- and Organizational Development Directorate	Human resource issues are reported to the ESC (Executive Steering Committee), and a report on the results of group-level engagement survey is prepared for the Supervisory Board.	Work-life balance Gender equality and equal pay for equal work Training and skills development
Occasional reporting to the governing body**		
Retail Customer Tribe	Submissions were made to the Board of Directors for the following: the policy for equal service opportunities for persons with disabilities the new product policy in compliance with consumer protection recommendations Regarding the complaint handling policy	Access to financial products and services
Human- and Organizational Development Directorate	Board of Directors submissions were made regarding the occupational health system and health insurance	Health protection and safety

* Information security and privacy protection constitute an important topic, which is managed by two separate areas of expertise.
** Only those areas or topics that are not covered in regular reporting are included.

It is not explicitly declared for the governing bodies and their committees how they consider sustainability impacts, risks, and opportunities when overseeing the Banking Group's strategy, major transactions, and risk management procedures. The bodies take positions based on the long-term interests of the Banking Group, and consideration is given according to generally applied principles. The Board of Directors' objectives and activities emphasize increasing shareholder value, efficiency and effectiveness, managing risks, and ensuring full compliance with external regulations, i.e., ensuring the most effective implementation of business, ethical, and internal control policies. The Board of Directors is responsible for ensuring the effectiveness of internal lines of defence and providing a sustainable business model that considers all risks, including ESG risks.

The Supervisory Board's responsibility extends to supervision of the lawfulness of the Company's operations, business conduct, and management, including directing the Company's internal audit organization and monitoring the operational effectiveness of internal defence lines.

According to the provisions of the SRD II[16] directive, the remuneration policy must contribute to the company's business strategy, long-term interests, and sustainability.

To facilitate all these, the Bank's Remuneration Policy and practice include that the remunera-

[14] The material impacts, risks and opportunities have been identified as presented in the @ESRS SBM-3 disclosure requirement.
[15] A The Hungarian National Bank's Recommendation No. 10/2022 (VIII. 2.) on climate change and environmental risks, as well as the integration of environmental sustainability considerations into the activities of credit institutions.
[16] Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement.

tion of executives is based on value creation. Long-term sustainable value creation, and ethical behaviour is promoted in the multi-year deferral of performance-based remuneration and its subsequent risk adjustment.

Sustainability and Climate Change in Incentive Mechanism
ESRS 2 GOV-3, E1 GOV-3

Members of the Supervisory Board and the Board of Directors of OTP Bank receive only fixed remuneration in their capacity as members. Executive Board members and employee delegates of the Supervisory Board, in addition to their employment, fall under the scope of the Banking Group's Remuneration Policy. Most of the other committee members also fall under this Policy. Employees not covered by the Policy typically receive incentive bonuses.
Sustainability-related incentives are in place for members covered by the Remuneration Policy: the principle of the performance measurement and evaluation system is that the amount of performance-based remuneration – alongside the preliminary and subsequent evaluation of risks – is linked to the level of achievement of group/bank/subsidiary institutional and individual objectives within a two-tier performance measurement system. The range of institutional indicators is uniform at the institutional level. For individual indicators, the weight of one indicator among the objectives – except for the network – is generally a minimum of 5% and a maximum of 30%. The evaluation of institutional and individual objectives is done separately on a scale of 0–100% (based on the level and weight of performance indicators and target objectives). Performance evaluation is based on individual agreements and individual performance evaluations within the affected group. The conditions of incentive mechanisms for those covered by the Banking Group's Remuneration Policy are approved by the Supervisory Board.
In performance evaluation, the measurement of specific sustainability-related objectives is done through the ESG and CSR indicator – as an individual indicator – which is considered a reference value. The "Environmental and Social Responsibility (ESG-CSR)" indicator is applied uniformly with a weight of 5% within performance-based remuneration for the first- and second-level managers of the Bank and the primary managers of the subsidiaries, and with a weight of 4% for regional managers. The following aspects are evaluated within the indicator: achieving the goals set out in the ESG strategy, applying significant ESG aspects during operations, implementing them into own business processes and internal regulatory documents, strengthening ESG awareness within the organization, providing quality data for the sustainability/integrated report by the set deadline, and properly operating CSR-related processes (especially: adequately supporting CSR initiatives related to the professional's field).
Climate-related considerations are taken into account as part of the ESG-CSR indicator for those covered by the Remuneration Policy. GHG emission reduction targets are not included in the performance evaluation.
Additional individual indicators related to sustainability are the following: The Banking Group measures compliance with the limits set in the Bank's risk appetite statement (RAS) within the individual indicators for the Deputy CEOs responsible for business and risk management and the CEOs of the subsidiary banks. The weight of the individual indicator is at least 5% and at most 10%.
The Banking Group measures prudent operation and the functioning of controls for all executives covered by the Banking Group's Remuneration Policy, with a weight of at least 5% and at most 10%. For first- and second-level managers, indicators measuring the strengthening of control function must also be included with a weight of 20%.
Based on Section 22 (2) of Act LXVII of 2019, the Bank does not prepare a remuneration report, so the consistency of the presented information with the remuneration report cannot be examined.

Due Diligence
ESRS 2 GOV-4

In the operation of OTP Group, certain elements of the sustainability due diligence process are implemented as part of the general group operations, not as a separate and continuous process.
In its business practices, the Bank considers the interests of the corporation, shareholders, customers, and partners. The Bank always applies a governance system and operates bodies and committees that support and assist the organization in monitoring the interests of customers and partners, changes in business needs, and shaping its business policy and relationships with customers and partners accordingly (Compliance Policy).
The standing committees established by the Board of Directors of OTP Bank are the highest-level bodies in the group governance system, serving as decision-making, decision-preparing, and advisory bodies of the Bank. Their scope of responsibilities expanded to making thorough analyses and supporting materials-based considerations, including feedback provided by stakeholders. Several committees are dedicated to various aspects of risk management (Credit and Limits Committee, Group Operational Risk Management Committee, Committee on the Prevention of Money Laundering, Risk Assumption and Risk Management Committee).

The individual elements of the due diligence process applied by OTP Group are presented in the Sustainability Statement as follows.
In identifying the elements, we built on the relationship between the due diligence elements presented in Chapter 4 of ESRS 1 and the ESRS disclosure requirements:

- Embedding due diligence in governance, strategy, and business model: @GOV-2, @GOV-3, @ESRS SBM-3
- Engaging with affected stakeholders in all key steps of due diligence: @GOV-2, @SBM-2, @IRO-1, @S1–2, @G1-1 policies
- Identifying and assessing impacts: this was implemented separately in connection with the preparation of this report, and is not integrated into the operation of the organization
- Taking actions to address those adverse impacts: action at material topics (@E1-3- E3-2- E4-3, @S1-4, @S4-4(1), @S4-4(2), @S4-4(3), @G1-3)
- Tracking the effectiveness of these efforts and communicating metrics and targets at material topics. (@E1-4, @S1-5, @S4-5(1), @S4-5(2), @S4-5(3), @G1-1).

Risk Management in Relation to Sustainability Reporting
ESRS 2 GOV-5

The sustainability reporting process is coordinated by the Marketing and Communications Directorate of OTP Bank, which establishes and operates internal controls. An important tool of risk management and internal control procedures is that reporting is carried out in close cooperation with the Bank's departments. According to OTP Group's governance model, OTP Bank, as the parent company, provides strategic control, guidance and cooperation with group members.
We identified changes in regulatory expectations, timely availability and accuracy of data as the main risk factors in the reporting process. When prioritizing risk factors, we considered the extent of the risk and the likelihood of occurrence. The risks associated with the timely availability of data are increased by changing regulatory expectations, given that it is necessary to modify the data collection methodology and the Sustainability Data Collection Platform, which is used by the Group to collect both quantitative and numerous narrative information, as well as Űproviding new information compared to previous ones may encounter difficulties with data providers.

Risk Mitigation and Control Measures:
reporting entity level

- To ensure compliance with CSRD reporting obligations, a Project Steering Committee

has been established, which continuously monitors the reporting and audit process.
- For quantitative information in sustainability reporting, we build on data and definitions already used by the Banking Group for other purposes, to mitigate the potential for errors due to definitional differences, as well as for those data risk management and control processes already implemented.
- Various tools such as explanations on the data collection platform and instructional videos assist the departments in the reporting and data collection process. In 2024, we requested feedback from the subsidiary banks on the usefulness of the support tools and improved them.
- The Marketing and Communications Directorate provide active support throughout the data collection process for any arising questions.
- During the preparation of the 2024 Sustainability Statement, interim data collection was also conducted in addition to the annual one, to check the data in a timely manner and reduce risks arising from the introduction of ESRS.
- The Sustainability Statement is approved by the Board of Directors and the Supervisory Board as part of the Annual Report before being published on the website.
- The 2024 Sustainability Statement as a whole is assured by an auditor based on a limited assurance engagement, in accordance with the regulations.
- For the first- and second-level managers of the bank and the primary managers of the subsidiaries, the ESG-CSR indicator is a mandatory part of performance-based remuneration, where the provision of quality data for the Sustainability Statement by the set deadline is an evaluation criterion.

data-level:

- Information collection through the Sustainability Data Platform makes data provision and reporting transparent and traceable.
- The four-eyes principle is applied to the collected information, with an approval function in addition to data entry in the data collection process.
- The data collection platform performs automatic checks based on multiple criteria, in addition to which the department coordinating the reporting also conducts checks. The discussions and error corrections related to the checks are traceable within the platform.
- We perform cross-checks between the data collection platform and data collected in other systems.
- After the reporting cycle, data providers receive feedback on the typical errors of the information provided through the data collection platform.
- We conduct consultations with the departments providing information regarding the correct interpretation and completion of narrative information.
- In case of narrative content, we aim to incorporate information from approved and documented sources.
- Approval is also required for narrative information.
- The information in the report is approved by the relevant departments.

1.3 Strategy

Strategy, Business Model and Value Chain
ESRS 2 SBM-1

Business Model, Products and Services

OTP Group's business model as a universal banking group aims to meet the financial needs of retail, private banking, micro- and small enterprises, medium and large enterprises, and municipal clients at a high level through branch networks, continuously developing digital and innovative remote service channels, as well as through agents and other contracted partners. The Banking Group served the financial needs of approximately 17 million clients at the end of 2024. The total revenue of the corporate group in 2024[17] was 4,276 HUF billion.

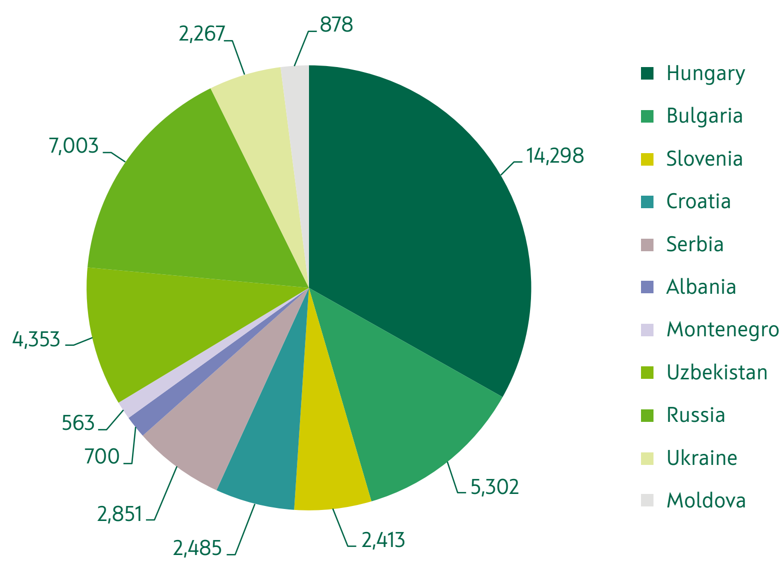
[17] The consolidated corporate group covered by the report, OTP Group, is a corporate group consisting of more than 100 companies, and its own operations cover the activities of this corporate group.

OTP Group is present in 10 countries in the Central and Eastern European region and entered the Central Asian region in 2023 with the acquisition of the Uzbek Ipoteka Bank. The parent bank of OTP Group, OTP Bank Plc., is a leading credit institution in Hungary. At the end of 2024, the Hungarian operation accounted for 48.52% of the Group's assets. In addition to its operations in Hungary, the Bank has foreign subsidiaries in a total of 10 countries through capital investments, typically holding 100% or nearly 100% ownership. Among the group members, OTP's Montenegrin subsidiary is also a market leader based on total assets, while the Bulgarian, Slovenian, and Serbian operations are the second largest in their respective local market. The Croatian and Moldovan subsidiaries rank fourth, and the Albanian subsidiary ranks third in terms of net loans in the local rankings of banks. Among the larger foreign subsidiaries, the Bulgarian accounted for 17.68%, the Slovenian 14.07%, the Croatian 8.72% (thus the Eurozone and ERM 2 countries accounted for 40.46% in total), and the Serbian 8.02% of the Group's assets.
Our acquisition strategy is based on creating shareholder value by achieving optimal operating size and leveraging OTP's expertise in regional markets. As a result of 24 bank acquisitions and one portfolio takeover carried out over more than two decades, significant experience has been accumulated within the Group in both the acquisition process and the integration and business-operational transformation projects within the Group.
The key banks and other financial companies within the corporate group offer a wide range of modern banking and financial services to both retail and corporate clients in Hungary and abroad: they collect demand and term deposits from their clients and offer a wide range of other savings forms, including – varying by country – pension services, government securities, investment funds, stocks, corporate bonds, and other securities and structured investments. In line with the strategy, the Group aims to ensure the conditions for stable operation and growth across economic cycles by maintaining a stable liquidity position.
Some group members have an active presence in the capital markets: OTP Bank has issued bonds in multiple currencies and maturities in recent years, partly to comply with MREL requirements, targeting investors across a wide geographical range. Additionally, OTP Mortgage Bank, the Slovenian subsidiary, the Albanian subsidiary, and the Uzbek Ipoteka Bank have outstanding issued mortgage bonds and bonds.
On the asset side, group members provide retail mortgage loans and consumer loans (including personal loans, credit card loans, commercial credit, car loans, overdrafts, baby loans), corporate investment and working capital loans, municipal loans, and leasing services. Within the Group's net loans, mortgage loans accounted for 27.86%, consumer loans 25.58%, corporate loans 35.52%, micro and small enterprise loans 3.92%, and leasing 7.11% at the end of 2024. Depending on the balance sheet structure of the entity, group members invest their liquidity reserves in the money and capital markets (including interbank loans and corporate bonds) or receive intergroup financing. Additionally, the wide range of modern financial services offered by the banking and non-banking domestic and foreign subsidiaries includes asset and fund management, investment and treasury services, payment services, pension services, and other services (e.g., guarantees, factoring, letters of credit, bill discounting).
The non-financial companies within the Group, which collectively represent a smaller 2.21% proportion[18] *based on profit, cover activities such as real estate development and operation, agriculture, and private equity fund management. The range of products and services offered did not change significantly in 2024.*
Differences can be observed between countries in terms of business focus, the range of services and products offered, and sales channels. Regarding business focus, while the proportion of retail and corporate loans and leasing portfolios is relatively balanced in most countries of the Group compared to the overall Group ratios, in Ukraine the corporate and leasing portfolios account for

[18] Profit after tax based on continuing operations.

over 90% of the outstanding loans, while in Russia the proportion of retail consumer loans reaches 99%, while the mortgage loan portfolio is negligible in both countries.
The process of selling the Romanian operation was completed in 2024. As a result of the exit, the Group does not conduct business activities in Romania.
The goal of the Banking Group is to continuously develop its services in the ever-evolving digital and technological environment to make them easily accessible, understandable, and secure for a wide range of clients. In addition to digitalization, OTP Group places great emphasis on sustainability, aiming to avoid negative environmental and social impacts, achieve positive impacts, and exploit potential business advantages. The Banking Group is committed to offering products that align with the real needs of clients and their capabilities, contributing to their financial well-being.
Our employees represent key value, and their high-level performance is the guarantee of OTP Group's results. As a responsible employer, our goal is to improve employee well-being. The Bank actively participates in developing financial awareness among the population and enriching cultural values.
OTP Group employed more than 43,118 people at the end of 2024.

Distribution of the number of employees of the OTP Group by country
as of 31. 12. 2024, total employees, persons*



* The figure includes countries with more than 50 people, excluding those with fewer than 5 individuals.

Value Chain

Upstream Value Chain

Financial Services: The upstream value chain preceding OTP Group's activities includes suppliers providing products and services necessary for the Group operations and the provision of its products and services.
The main activity of OTP Group is to provide financial services. For this activity material and energy-intensive procurements are not connected to raw materials, but rather for own operation. Service procurement is dominant, particularly in marketing communication, IT, and telecommunications services. The properties used by the Group for operational activities include both owned and leased assets. Corporate vehicles are typically owned by the Group.
Other activities: Among the Group's other activities, service sector companies have an

upstream value chain similar to financial sector companies. The typical procurements of subsidiaries active in the real estate sector and those of the agricultural and food industry differ. Companies involved in the development, operation, ownership, and fund management of real estate (e.g. shopping centers, office buildings) have relatively greater environmental impacts, particularly in terms of building materials and energy needs. The raw material needs of agricultural and food industry companies, which also have relatively greater environmental impacts, are partly sourced from outside the Group, with significant intra-group procurement as well.

Downstream Value Chain

Financial Services: The downstream value chain following OTP Group's activities includes those involved in the sale of products and services and the customers who use these products and services.

An agent network also participates in the mediation of financial services; in 2024, the number of agents at the group level was 13,700 (additional information may be collected here). The most significant environmental and social impacts of the Banking Group arise through those using financial services, primarily related to lending, which is the most impactful part of the value chain. In asset management, the downstream value chain is the managed assets, which is significantly smaller in business terms and impacts, and is present in five countries within OTP Group (Hungary, Bulgaria, Croatia, Serbia, Ukraine).

Other activities: Some service companies among the other activities directly sell their services to customers. Tenants are present in the value chain of the real estate sector of the Group. The products of agricultural and food industry companies reach consumers through a longer value chain.

ESG Strategy

Stability and sustainability are two of the cornerstones of OTP Group's corporate strategy. The Management Committee unanimously approved the Group's ESG strategy for 2021–2025 in 2021. It is reviewed annually to align with changes in the market and regulatory environment. The strategy, along with the related vision and mission, did not change in 2024.

OTP Group aims to play a regional leading role in financing the fair and gradual transition to a low-carbon economy and to build a sustainable future through responsible solutions. OTP Group has set a goal of achieving a green loan portfolio[19] of HUF 1,500 billion by 2025.

The Group defines its long-term sustainability, transparency, and ethical operation through stable management, responsible and transparent governance, being a responsible employer in the labour market, and an active participant in society. Our goal is to provide responsible and fair financial services tailored to customer needs, fostering open cooperation with our stakeholders based on trust while reducing our negative environmental impacts.

The strategy has three pillars: responsible service provider, responsible employer, and responsible social actor.

Vision

Responsible financial decisions and socially and environmentally adequate, ethical financial solutions are available for all economic participants and citizens in all of the countries covered by OTP Group's operations.

Mission

For us, sustainability means taking responsibility for our economic, social, and environmental impacts. We firmly believe that with our leading role in the Central and Eastern European region and our presence in Central Asia, our pioneering developments, conscious and ethical business operations, and exemplary

[19] The definition of green loan portfolio can be found @Environmental Information.

partnerships, we create value and contribute to a sustainable future.

Our goal is to integrate into the operations of the departments involved in the ESG strategy for the relevant topics by 2025. In addition to the business opportunities the strategy includes identifying and managing significant risks and addressing social and governance targets.

Strategic goals	KPIs	2024 year-end result
Responsible service provider • Products and services promoting the green transition of the economy • Products and investment services aimed at promoting investments in a sustainable economy • Active ESG risk management	Group-wide, a total of HUF 1,500 billion in green loans by 2025.	With 1,027 billion HUF in green loans, we have achieved/exceeded the target set for 2024
Responsible employer • Enhancing employee well-being and development, diversity and employee engagement	Increase the level of employee engagement, achieving the 75th percentile of the financial sector benchmark and the 75th percentile globally* ongoing at Group level. The financial sector target was 75% and the global target was 78%** in 2024.	At Group level, the employee engagement level was 77%, up 5% on the previous year, meeting the target for the **financial sector** but not the global target
Responsible social actor • Significant reduction of emissions from own operations • Contribution to social goals and the UN Sustainable Goals (SDGs) through responsible products and services, as well as donations	Carbon neutrality partially offset by carbon credits by the end of 2022 (achieved), and the goal of net zero emissions for OTP Bank by 2030.[20]	We have been achieving the set goal since 2022
	The goal is for OTP Bank to become a member of the S&P Dow Jones Sustainability Index by 2025.	The Bank's score in the S&P Global Corporate Sustainability Assessment improved by 9%, or 4 points, in 2023 compared to the previous year[21]

* Based on the benchmark of more than 750 companies.
** The engagement score is an output value, which means it cannot be directly improved. For a more detailed methodological description, see @ESRS S1-5.

The majority of subsidiary banks developed their ESG strategies by 2022, and with the approval of the ESG strategies of the Russian, Ukrainian, and Moldovan subsidiary banks in 2024, all subsidiary banks now have ESG strategies. In these strategies, the subsidiary banks have defined their own goals, which align with the objectives of OTP Bank. The subsidiary strategies address ESG risk management, development of green lending, organizational frameworks, social issues, and mitigating the environmental impacts of operations. The subsidiary banks have also defined the KPIs to measure the effectiveness of achieving the goals sets. The Board of Directors of OTP Bank is informed of the achievement of ESG goals and the annual review of plans.

Green Financing

The details of green financing are presented in the @Green lending target disclosure requirements.

OTP Group integrates green/climate-conscious lending into its business activities and aims to ensure that over time, any client in any sector can receive a loan under green conditions given the client has a green/sustainable goal they wish to achieve with the loan. The maturity of this process varies by country, industry, and customer segment.

The key sectors for green lending in the Group's portfolio are the following:

- Energy: renewable energy production, distribution, storage, and related loan purposes,
- Real estate: construction, purchase of green properties, as well as financing renovation of buildings that result in significant energy improvements,
- Transportation: electro-mobility.

Challenges

One of the significant challenges for OTP Group in sustainable finance is understanding, collecting, evaluating, integrating into internal

[20] In the case of carbon neutrality partially offset by carbon credits, the carbon credit comes from a verified source, without restrictions on the type. Net zero emissions involve reducing greenhouse gas emissions as much as possible and neutralizing unavoidable emissions through carbon removal. The goal covers Scope 1–2 emissions.
[21] The latest available result as of 31 December 2024.

processes, and reporting on the sustainability performance, plans, and strategies of its clients. From the clients' perspective, measuring and disclosing sustainability performance is an obligation affecting an increasingly broad customer base, impacting both corporate and non-corporate clients, but to a varying degree. According to our experience, the readiness of the client base managed by OTP Group to prepare the necessary data and report is heterogeneous, but it is moving in a favorable direction at an increasing rate. The primary difficulty for companies in providing sustainability data is that, since there were no such expectations previously, they did not measure this data, and they lack the necessary knowledge and systems to measure, store, and provide the data credibly.
In the coming years, numerous obligations and business needs related to sustainability data will emerge, affecting retail and corporate lending, risk management processes, various internal controlling and reporting processes, and external data provision and reporting processes, both at the parent bank and the subsidiaries. Prioritizing and appropriately managing this complex challenge on the IT system side is crucial to ensure that the Banking Group can meet its regulatory obligations and manage the risks and business opportunities arising from climate change.

Stakeholders
ESRS 2 SBM-2

The goal stated in OTP Group's corporate strategy in OTP Group's Management Report is to meet the needs and expectations of its clients, investors, and employees at the highest possible level.

Additionally, the Banking Group's ESG strategy expresses a commitment to behaving as a responsible partner with all its stakeholders, which is reflected in the strategy's three pillars: responsible service provider, responsible employer, and responsible social actor.

OTP Group's Code of Ethics stipulates that the goal concerning stakeholders[22] is to enforce the principles of ethical business conduct, and adherence to these principles is mandatory for all employees and agents alike.

Each member company of the Banking Group maintains relationships with the relevant groups according to its organizational characteristics and the characteristics of the stakeholder groups. The Banking Group cooperates with its most important stakeholders, and one of the goals of maintaining contact with stakeholders is to become informed of their opinions, as meeting expectations ensures the Group's social legitimacy and business success. We continuously seek feedback and consider it in the development of our strategies, activities, and programs. From the perspective of the business model and strategy, the opinions of clients, investors, employees, and regulatory bodies are the most relevant.

In the context of the materiality assessment and due diligence, the view and interests of stakeholders regarding the strategy and business model were not explored[23].

[22] Those who fulfill contractual obligations for OTP Group and, in the course of their activities, meet a wide range of OTP Group clients or potential clients, provide services on behalf of OTP Group, and clearly appear in public as representatives of OTP Group while fulfilling their contractual obligations.
[23] During the materiality assessment, the opinions of the stakeholders are detailed by IRO-1.

Key stakeholders	Purpose of engagement and cooperation	Method of engagement and cooperation
Customers, clients (retail, corporate)	Improving service quality, providing quality information related to services, understanding customer needs, protecting customer data	Customer satisfaction surveys, examining aspects important to customers, market research Informative and educational materials, videos Service-related information (e.g., account statements) Customer service (bank branch, telephone, video, internet) Complaint handling
Shareholders bondholders (and analysts)	Informing about the activities and operating environment of the Group, the Group's financial results, the development of external and internal factors affecting them, expected outlooks, and ESG performance. Understanding expectations.	Annual report, stock exchange reports and presentations General meeting Personal and virtual meetings Answering investor and analyst questions
Employees	Responsible employer practices, enhancing employee well-being and development, diversity, and employee engagement. Providing a healthy and safe work environment with equal opportunities, fair employment practices.	Employee engagement measurement, providing feedback opportunities Performance evaluation Meetings and consultations with employee representatives (e.g. trade unions) Intranet, internal communication
Regulatory bodies, authorities	Anti-money laundering, fair market competition, ensuring access to financial services, equal opportunities, economic intermediary, helping to achieve social goals, regulatory compliance, expanding green finance	Reports in compliance with legal requirements Ensure availability of publicly subsidized products Cooperation to prevent crime Consultations through representative bodies (banking associations)

OTP Group considers the expectations and opinions of interested parties and incorporates them into its strategy and business model. The Board of Directors, the Supervisory Board, and the various committees receive regular reports on matters related to stakeholders. Members of the governing bodies have the opportunity to request information about the materials of any committee, as well as from any department of the Group.

The governing bodies were informed about the feedback from stakeholders – such as employees, customers, shareholders, and regulatory bodies:

- The Supervisory Board received a report on the group-level engagement survey process and its results.
- Semi-annual reports are submitted to the Board of Directors and the Supervisory Board on the experiences of handling customer complaints, the consumer protection investigations of the Hungarian National Bank (MNB, Supervisory Authority), and customer complaints received by foreign subsidiary banks.
- The governing bodies receive quarterly group-level information on the closed investigations of regulatory bodies, as well as on the MNB supervisory procedures and the status of the implementation of the recommendations made to the Bank. The investigation reports containing the results of the examinations prescribed by the MNB, to be carried out by internal audit, are reviewed and approved by the Supervisory Board or both the Supervisory Board and the Board of Directors, before being sent to the Supervisory Authority.
- The Board of Directors receives a comprehensive quarterly report on the implementation and progress of the ESG strategy.

1.4 Materiality Assessment

ESRS 2, E1, E2, E3, E4, E5, G1 IRO-1

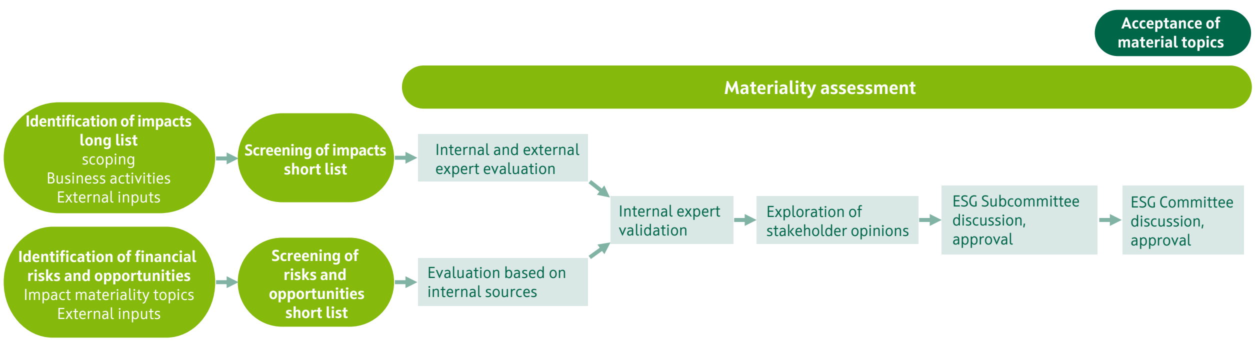
The purpose of the materiality assessment is to enable OTP Group to identify the impacts, risks, and opportunities to be presented in the Sustainability Statement. The materiality assessment focused on determining whether a topic is material. The depth of examination of individual impacts, risks, and opportunities were carried out with this perspective.

The methodology for the procedure of identifying and evaluating impacts, risks, and opportunities was developed for the reporting process – in accordance with ESRS requirements – building on the existing processes of the Group where available. Management of impacts, risks, and opportunities is accomplished through several different processes within OTP Group (operation of the @ESG organization, implementation of the @ESG Strategy and @ESG Risk management). The risk management processes are presented under @ESG Risk management disclosure requirements.

In recent years, several materiality analyses have been conducted as part of the sustainability reporting process, aligning with GRI requirements. The most recent analysis preceding the current was completed in early 2022, and it examined the two dimensions of impact materiality and financial materiality. However, due to requirements of ESRS, the current materiality analysis presented below was prepared with a significantly revised and expanded methodology compared to the one before in 2022. The materiality analysis is planned to be reviewed annually, next time in the course of 2025.

The process of materiality assessment, including the methods, and the decision-making process are illustrated in the following diagram.

The OTP Group's double materiality assessment process:



Identification and Evaluation of Impacts

During the materiality assessment, OTP Group focused on factors associated with an increased risk of adverse impacts. The activities within the Group provide a suitable starting point for identifying the increased risk of adverse impacts, therefore we grouped the companies included in OTP Group by activity sector and identified the impacts arising from their own activities and along the value chain.

We identified three relevant activity sectors: the most significant being (1) financial services; (2) the real estate sector – as several group members are involved in real estate development, operation, and ownership that is not related to the operation of OTP Group (e.g. office buildings, bank branches) but service external parties; (3) the agriculture sector – several companies are involved in agriculture and the food industry.

The long list of impacts was determined based on the ESRS topic list and additional inputs (GRI Standards 2021 topics, GRESB Real Estate Assessment criteria, UNEP FI Consumer Banking identification module, regulatory expectations, topics from the previous materiality assessment, benchmarks). The topics defined by ESRS were supplemented with OTP Group-specific content, and OTP Group-specific topics were also identified. Taxation, Financial awareness, Community engagement, Attitude shaping, Privacy (and information security, cybersecurity), Corporate culture (and compliance, anti-money laundering).

The criteria for evaluating and ranking impacts are shown in the table below.

Impact type	Assessment factors	
Actual negative	severity (scale, scope, irreversibility)	
Potential negative	severity (scale, scope, irreversibility)	likelihood
Actual positive	scale, scope	
Potential positive	scale, scope	likelihood

From the long list of impacts – based on the criteria and inputs presented above – we narrowed down the list of impacts to be evaluated for those where it is reasonable that a material impact may arise (short list). The short list of sustainability impacts was evaluated using a scoring methodology in a multi-round iterative process involving internal experts, managers of the Banking Group, external experts, and stakeholders. The extent of the impacts was determined based on objective data to the extent possible. Previous sustainability reporting data sources and additional internal information were used. To determine material impacts and topics with reasonable effort, we consistently aimed to rely on extensive information for the evaluation and, in addition to internal inputs, relied on generally accepted views within the profession (e.g. which sector has which material sustainability impacts).
The information characterizing the impacts is not comparable in most cases, so a scale was needed to be used for the evaluation on which these different types of information could be placed and compared. For this purpose, we used a scale of 0–5 for scoring the scale, scope, and reversibility of the impact in the case of negative impacts. Thus, the maximum score for an impact was 15.
If any characteristic of the impact received a score of 5, the impact became material regardless of the other criteria. For positive impacts, reversibility is not evaluated, so a greater impact was required to reach the materiality threshold.
The impacts were evaluated over the time period where their severity is expected to be the greatest.
Sustainability topics were evaluated at the ESRS subtopic or sub-subtopic level. A sustainability topic became material if at least one assigned impact reached a score of 9 based on the above evaluation.
We considered sub-subtopic level evaluation in all cases where ESRS identified a sub-subtopic, but we only evaluated at the sub-subtopic level if the identified impact could be separated into a sub-subtopic for OTP Group.

For the evaluation of the loan portfolio, we started from the activities of the financed companies based on NACE code classifications when estimating impacts and potential impacts. At the time of the analysis, there was no clear classification system that would match the categories appearing in ESRS with activity sectors. Therefore, we identified these sectors using and synthesizing various sources. To achieve the best approximation, we considered industries that also appeared in different sources as relevant and used the available experience regarding the sustainability impacts of different industries.
Regarding the impacts of the agriculture and real estate sectors, we considered sector-level materiality (where a sustainability topic is not material at the entire group level).
For climate-related issues, GHG emissions were specifically used. To identify the **impacts** of our own operations, we identified actual and potential future emission sources based on activities and along the value chain.
For Scope 1–2 emissions, we used the already available data. For Scope 3 emissions, partial data were available for the loan portfolio and investment fund management for the year 2023 at the time of the analysis.
For this information, please refer to Chapter @Climate Change disclosures and @Annual Report of OTP Group 2023.
In addition to the direct impact, we also considered the importance of setting an example when evaluating the impacts.
The evaluation of the effects related to pollution and resource use and the circular economy was also carried out in the above manner, in relation to our own activities and the entire value chain, no further investigation was carried out.
The evaluation of impacts related to biodiversity was also carried out in the above manner, covering our own activities and the entire value chain, without further examination. Among the corporate group's agricultural companies, some operate in or near Natura 2000 protected areas. The activities of Agromag Plusz Ltd. and Nemesszalóki Mezőgazdasági Ltd. affect protected areas, and to mitigate the impacts, the companies manage these areas by com-

plying with nature conservation and environmental regulations and fulfilling the expected reporting obligations to the authorities.

Consultation with Stakeholders

We used various sources to understand the opinions and expectations of stakeholders, which were considered during the identification and evaluation of material impacts.

Among others, we used:

- ESG assessments and questionnaires: Sustainalytics, MSCI, Moody's.
- Residential TRI*M Index research (Cross-country brand and satisfaction international, nationally representative[24] residential research), which measured brand, satisfaction, and loyalty.
- Employee engagement surveys, particularly OTP Group's[25] 2023 engagement measurement, which included 28,990 responses.
- Specifically for OTP Group's materiality assessment, we sought opinions through an online stakeholder questionnaire from civil organizations and universities; authorities, supervisory authorities and public administration; financial analysts and stock exchanges; the media; and employee representatives. Based on the feedback received, one topic was included in the list of material topics (employees: work-life balance), as more than a third of the respondents rated it as material. Regarding impact materiality, all stakeholders received the same questionnaire. We also sought the opinions of financial analysts and stock exchange stakeholders from a financial materiality perspective. The questionnaire primarily contained multiple-choice questions, but there was also the opportunity to raise additional potentially material topics and, in the case of one question, to provide an open-ended response. Participants were informed about the background information needed to complete the questionnaire and the purpose of the questionnaire.

Stakeholders specifically affected by pollution and resource use and the circular economy were not consulted.

Identification and Evaluation of Financial Risks and Opportunities

The identification of financial risks and opportunities related to sustainability topics was the result of an iterative process.

As a starting point for identifying financial risks and opportunities (long list):

- We used the topics included in ESRS,
- Supplemented with inputs also used for impact materiality,
- SASB standards for the financial sector, and
- ESG rating topics.

Based on the latter two inputs, no new topics needed to be added.
The sustainability topics where relevant risks or opportunities might arise for OTP Group (short list) were identified in workshops and subsequent consultations with the involvement of OTP Bank's experts. Participants considered whether the risks and opportunities were relevant in the short, medium, or long-term. The deeper exploration and evaluation of risks and opportunities began for the relevant topics. The Banking Group does not use a threshold applicable to all areas for financial materiality. OTP Group experts did not consider it justified or practical to apply such a threshold, partly because different risks and opportunities can have different financial impacts. Therefore, during the evaluation we applied the threshold values (or derived conclusions) from the documents used for the evaluation, and if these were not available, we determined the threshold value during the materiality assessment.
OTP Group has detailed risk management policies and systems covering all types of risks (loan, country, counterparty, market, liquidity, operational, compliance), including ESG risk management, the practice of which is continuously evolving. OTP Group takes a holistic

[24] Except for Moldova, Ukraine and Uzbekistan, where the survey was conducted based on an urban sample.
[25] The process of understanding the opinions of the employees of the Uzbek subsidiary will be introduced gradually, according to a unique schedule. In the Russian subsidiary, the engagement survey was carried out on a different platform and based on a list of questions.

approach to ESG risks and ESG factors, integrating them into the risk management frameworks of the main risk types, i.e. treating ESG risk as a risk type rather than a stand-alone risk type. Sustainability risks are considered together with other risks.

Financial risks and opportunities arising from sustainability topics can originate from three main sources, which were examined as follows:

- For opportunities, the ESG strategy and annual plans are decisive, as the strategy focuses on exploiting material opportunities.
- The implementation of the Climate & Environmental (C&E) Risk Materiality Assessment for the group-level assessment of sustainability risks related to lending activities started in 2024, in line with the European Banking Authority (EBA) requirements. The results of this assessment were not available at the time of the materiality assessment and the start of this reporting. Therefore, as an alternative solution for evaluating these risks, we analysed the results of the climate change stress test and the income from interest and net fees and commissions based on activities broken up by NACE codes. The matching of risks with activities was done in the same way as applied for impact materiality. Another source of information was the Environmental Risk Materiality Assessment available at some subsidiaries.
- Other topics representing relevant risks fall into the category of operational risks. OTP Group conducts an annual group-level Risk and Control Self-Assessment (RCSA) to identify operational risks. During the process, departments identify operational risks in their processes, their likelihood of occurrence in different cases, and link risk mitigation mechanisms, i.e., control functions and activities, to the identified operational risks. Among the risks identified in this process, those attributable to sustainability reasons were assigned to sustainability topics.

We evaluated relevant risks and opportunities on a 3-level scale (large, medium, small) based on (1) their potential magnitude and (2) their likelihood. **We considered medium/large and large/large risks and opportunities as material.**

Additional information to the assessment of climate change related topics:
In line with the general procedure applied during the identification and evaluation of impacts, the identification of risks and opportunities was also based on activities.
Regarding the assessment of transition and physical **risks** related to lending activities:

- OTP Group's 2023 group-level climate change stress test evaluated the risks as presented in the @Stress test (For long-term impacts, the use of NGFS[26] climate scenarios in the banking sector is the generally accepted and mostly alternative-free approach.)
- The group-level stress test provided suitable basis for the evaluation, while some subsidiaries had their own environmental risk materiality assessments (C&E Risk Materiality Assessment), which cover other credit risks, among which we considered the assessments of the Bulgarian and Croatian subsidiaries as examples.

With regards to the assessment of financial risks related to own operations, the following was analysed:

- The annual group-level Risk and Control Self-Assessment (RCSA) 2023 provided the basis for the analysis of operational risks. During the annual self-assessment process, departments identify operational risks in their processes, their likelihood of occurrence in different cases, and link risk mitigation mechanisms to the identified operational risks. The annual RCSA results and their detailed evaluation were submitted to the Group Operational Risk Management Committee, and these results are also part of the calculation of operational risk management capital requirements. The RCSA measures the risks for the next year (short-term), with the risk trend indicating medium and long-term risks. Climate-related hazards identified during the evaluation fell into the category of physical risks, and the risk of events occurring in the supply chain was also identified. Participants could identify any climate-related hazard or risk, and no prior exclusion of climate-related risks was made. Based on the applied methodology, similar to other non-climate-related risks, departments did not evaluate risks using a predefined hazard list and asset list. Climate change-related risks did not reach the materiality threshold in the RCSA evaluation.
- The Climate & Environmental Risk Materiality Assessment of the Bulgarian and Croatian subsidiary bank also examined operational risks, among other things, and the results were taken into account. The Croatian document classified the operational risks mainly due to extreme weather events (physical risk) as low-medium risk in the short to medium-term and medium risk in the long-term (which is not a material risk level according to the document's own classification). The Bulgarian analysis indicated moderate exposure.

The above documents did not address the identification of assets and business activities that are incompatible with the transition to a climate-neutral economy or those requiring significant effort for this transition. The risks identified in relation to climate change were considered manageable for OTP Group.
For **financial opportunities,** we considered the ESG strategy (@Strategy) and annual plans as decisive, as the strategy focuses on exploiting material opportunities. Expanding the green loan portfolio is included as a financial opportunity in the ESG strategy. The strategy covered the time period up to 2025 at the time of the analysis.
The material impacts, risks, and opportunities related to climate change are presented in the @ESRS SBM-3 disclosure.

Validation of the evaluation and approval
The evaluation of impacts, risks, and opportunities was followed by a multi-round internal review. As part of this, the evaluation

[26] The Network of Central Banks and Supervisors for Greening the Financial System.

of impacts rated below but close to the materiality threshold was reviewed based on stakeholder feedback. Representatives of Hungarian subsidiaries and foreign subsidiary banks could also provide feedback on the materiality assessment.

The ESG Sub-Committee discussed the list of material impacts, risks, and opportunities and, after one modification, approved it by majority decision in accordance with the Sub-Committee's operating rules.

The ESG Committee discussed and approved the results of the materiality assessment. A unanimous decision was required for approval in accordance with the Committee's operating rules. The Chairman of the ESG Committee is a member of the Board of Directors.

The results of the materiality analysis were included in the Board of Directors' briefing on the agenda items of the ESG Committee's quarterly meetings.

ESRS SBM-3

OTP Group's Material Sustainability Impacts, risks and opportunities:

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/Risk/ opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[27]	Short-term	Medium-term	Long-term
E1 Climate Change								
Climate Change Mitigation								
OTP Group's impact stems from direct and indirect greenhouse gas emissions, exacerbating climate change. This effect is significant for the entire group. OTP Group's indirect emissions related to its loan portfolio (Scope 3) exceed Scope 1–2 emissions by several orders of magnitude, and significant Scope 3 emissions are also associated with asset managers. Direct emissions from operations and indirect emissions from energy consumption (Scope 1–2) are relatively small for most companies, given that they provide financial or other services. However, due to the Group's size, these emissions are significant overall. This impact is material for the entire group. Several group members, which are significantly smaller[28] compared to financial institutions, operate in the agricultural and food sectors, as well as the real estate sector, where these emissions are also relatively higher.	The Banking Group aims to facilitate climate change mitigation by reducing emissions associated with its lending and operations. By the end of 2024, it prepared a decarbonization (transition) plan for its loan portfolio. The ESG strategy has set a KPI for green lending for the period up to 2025. The balance sheet green exposure of the OTP Group is continuously increasing. In addition to efficiency measures, the use of green electricity plays a significant role in reducing Scope 1–2 emissions.	Actual negative impact		X	X	X	X	X
OTP Group, through its financial products, encourages the mitigation of climate change within its portfolio. Through its applied practices, the Banking Group also has a significant exemplary and awareness-raising impact, considering its wide customer base.		Actual positive impact		X	X	X	X	X
A significant business opportunity for the Banking Group is the expansion of green lending that facilitates climate change mitigation in the countries where it engages in corporate lending and retail mortgage lending (there is no active green lending according to OTP standards in Ukraine).		Opportunity			X	X	X	X
@E1-SBM-3 This is material for OTP Group's lending activities because, in connection with climate change mitigation, transition risks arise for a portion of the customer base, which indirectly also poses a risk to the Banking Group. The extent of this risk is estimated through stress testing of the corporate portfolio.	Risk management is conducted within the framework of ESG risk management.	Risk			X		X	X
Climate Change Adaptation								
OTP Group's lending practices impact adaptation, either facilitating (by expecting or supporting with favourable conditions), hindering, or remaining neutral towards clients' adaptation efforts. The need for adaptation is strongly necessary in several sectors within the portfolio (e.g. mortgage loans, agriculture, real estate, construction sectors.	The Banking Group aims to facilitate adaptation to climate change through green lending. Risk management is conducted within the framework of ESG risk management.	Actual positive impact			X	X	X	X
The Banking Group strives to leverage the business opportunity arising from lending that facilitates adaptation to climate change.		Opportunity			X		X	X
E1-SBM-3 18 This also includes the physical risks associated with lending activities, as well as some transition risks (investments necessary for adaptation).		Risk			X		X	X

[27] For client-related topics, we have indicated only where the impact depends on the client's practice, the influence of the Group is indirect.
[28] Sales revenue, balance sheet total, number of employees.

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/Risk/ opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[27]	Short-term	Medium-term	Long-term
Energy								
By financing energy-intensive industries, the Bank Group has a negative impact.	Within green loans, these goals represent a particularly large proportion, and financing is also significant in the affected sectors. The Banking Group addresses this topic through the methods and tools presented in the previous two topics.	Actual negative impact			X	X	X	X
The Group has a positive impact by providing incentive loans for renewable, carbon-free energy sources considered green during the transition, and by encouraging energy efficiency.		Actual positive impact			X	X	X	X
Similar to climate change mitigation and adaptation, the business opportunity arises within green lending, where the expansion of the use of renewable and green-certified energy sources plays a significant role.		Opportunity			X		X	X
Financing energy-intensive and fossil fuel-using companies poses credit and reputational risks for OTP Bank and its subsidiaries.		Risk			X		X	X
E3 Water and Marine Resources								
Water Withdrawal								
In OTP Group's corporate loan portfolio, the presence of sectors with high water withdrawal is significant. To better understand the impacts, it is necessary to investigate the practices employed by these companies.	There is an opportunity to finance these goals within green lending. The Banking Group's minimum expectation for its clients, which is monitored, is compliance with relevant environmental and social laws and regulations, as well as possessing the necessary permits and authorizations for their operations. Understanding clients' practices beyond these requirements is ongoing, in parallel with the evolving and strengthening regulatory expectations. Based on this, expectations that encourage responsible behaviour can be formulated.	Actual negative impact			X	X	X	X
Green lending finances activities that have a positive impact.		Actual positive impact			X	X	X	X
Financial risk primarily arises in relation to those loan clients who are unable to adequately manage changing or existing environmental expectations (e.g., stricter regulations, changing consumer preferences, fines) or face difficulties in ensuring the water needs of their activities. A deeper understanding of the risk requires further analysis.		Risk			X	X	X	X
E4 Biodiversity and Ecosystems[29]								
Direct impact drivers of biodiversity loss								
In the corporate loan portfolio of OTP Group, sectors potentially negatively impacting biodiversity and ecosystems are significant. To better understand these impacts, it is necessary to uncover the practices employed by the companies.	The minimum expectations set and monitored by the Banking Group for its clients include compliance with relevant environmental and social laws and regulations, as well as possessing the necessary permits and licenses for their operations (currently, there are significantly fewer requirements related to biodiversity compared to water).	Actual negative impact			X	X	X	X
The Banking Group indirectly influences the extent of these impacts through financing conditions and can encourage positive effects.	Understanding clients' practices beyond these requirements is ongoing alongside the evolving and strengthening regulatory expectations, which will form the basis for articulating expectations that encourage responsible behaviour.	Potential positive impact			X	X	X	X

[29] E4 SBM-3 No significant negative impacts were identified in terms of lnd degradation, desertification/soil sealing.

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/Risk/opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[27]	Short-term	Medium-term	Long-term
S1 Own Workforce OTP Group employs 43,118 people, so many impacts on its own workforce are significant.								
Working conditions: Work-life balance								
The Banking Group influences work-life balance through the provision of overtime, flexible employment opportunities, and access to child-care facilities. The family-related commitments of female employees are typically stronger, and the fact that approximately two-thirds of the Group's employees are women amplifies these impacts.	At OTP Group, various employee benefits and support systems are continuously available to help maintain employee well-being. The measures focus on the areas of working hours and flexibility, holidays and absences, well-being and recreation.	Actual positive impact		X		X	X	X
The effects may be negative if OTP Group practices do not adequately take employee considerations into account.		Potential negative impact		X		X	X	X
Working conditions: Health and safety								
Stress emerges as a relevant risk for a significant portion of employees, considering that most staff at the member companies work in non-hazardous positions. Occupational safety risks are more significant in agricultural companies.	OTP Group operates occupational health and safety programs to maintain a safe and healthy working environment. It is a common, ongoing practice within the group to conduct regular, preventive health examinations for employees and stress management is also supported by action packages.	Actual negative impact		X		X	X	X
Equal treatment and equal opportunities: Gender equality and equal pay for work of equal value								
This is a topic that strongly influences employee well-being, made even more important by the high proportion of female employees. The corporate group monitors the pay ratio between men and women in the same positions, and at the parent bank and most subsidiaries, this difference is minimal.	OTP Bank has a strategy for creating gender equality, and several subsidiary banks have specific diversity policies in place. The majority of group members continuously implement measures to promote equal opportunities and diversity. Leadership training and internal awareness campaigns are implemented to strengthen an inclusive mindset.	Actual positive impact		X		X	X	X
The proportion of female managers is consistently lower at higher levels. At some subsidiary banks, the difference is greater for employees in the same position.		Actual negative impact		X		X	X	X
Equal treatment and equal opportunities: Training and skills development								
OTP Group's training and skills development practices influence the sector and other employers due to its significant role as an employer. Access to training is always ensured. Performance evaluations at the Group's member companies follow different methodologies, with a smaller proportion of employees participating in this process at several member companies.	OTP Group provides a wide training portfolio for its employees. Professional and personal development training, as well as other (e.g. mandatory) training. These plans are developed with employee involvement and take into account the results of performance evaluations.	Actual positive impact		X		X	X	X
The impacts may be negative if OTP Group practices do not ensure equal access to training.		Potential negative impact		X			X	X
Equal treatment and equal opportunities: Employment and inclusion of persons with disabilities								
Due to its size and scope of activities (as a wide range of society interacts with its employees), the Banking Group could have a significant impact on the employment of persons with disabilities and the change in this employment culture.	The Banking Group prohibits all forms of discrimination, but measures to support the employment of persons with disabilities are not widely implemented.	Actual positive impact		X		X	X	X
Currently, the employment of these individuals is low at the group level.		Actual negative impact		X			X	X

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/Risk/ opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[27]	Short-term	Medium-term	Long-term
Equal treatment and equal opportunities: Measures against violence and harassment in the workplace								
The large number of employees and the high proportion of female employees make this topic important, further emphasized by the lower proportion of female employees in higher positions (increasing the risk of abuse). No reported and confirmed cases of abuse have occurred, so the impact is potential.	The Banking Group implements measures related to the application of the Code of Ethics.	Potential negative impact		X		X	X	X
Equal treatment and equal opportunities: Diversity								
Due to the significant number of employees, the member companies of the Banking Group have both the opportunity and the role to implement diversity. OTP Group prohibits all forms of discrimination. (This topic partially overlaps with gender equality and the employment of persons with disabilities.)	*See: Gender Equality and Equal Pay for Work of Equal Value*	Actual positive impact		X		X	X	X
The Banking Group's practices provide room for improvement in implementing diversity.		Actual negative impact		X			X	X
S4 Consumers and end-users These topics are material for member companies providing financial products and services.								
Information security and data protection[30]								
The banks within the Banking Group hold a large amount of sensitive data about their customers. By protecting personal data and implementing information security and cyber protection, the Banking Group has a positive impact on its customers.	Security systems and workflows are constantly evolving, and staff training is also regular. The Group aims to use the most modern solutions for data management, data security and data leakage prevention, supported by organizational development, technical, customer education and cooperation measures. The parent bank continuously supports and monitors the anti-fraud efforts of its subsidiaries. The Banking Group's data management processes operate within a permanent framework, according to regular activities.	Actual positive impact		X		X	X	X
Despite OTP Group's practices that prioritize safety and secure operations, it sometimes happens that customers suffer losses.		Actual negative impact		X		X	X	X
A breach of personal data protection, fraud, or violation of legal requirements, as well as successful attacks and incidents in the field of information security and cybersecurity, can cause significant losses to both the banks of OTP Group and their customers. Data protection deficiencies, violations, and potential incidents not only carry the risk of significant financial penalties but can also lead to customer complaints and loss of customers. Consequently, the reputation of the banks would decrease.		Risk		X			X	X
Access to quality information[31]								
Quality information provision ensures objective information and understanding of financial products for all customers. Its implementation affects customers' well-being and financial situation, as a financial product can have a significant impact on a customer's life. This topic is primarily important for retail and SME customers, and its significance is even more pronounced for vulnerable social groups. The practices of OTP Group have a positive impact.	Information and communication about banking products and services are highly regulated areas in most countries where OTP Group operates. Member companies support good financial decisions and knowledge expansion through educational videos and calculators, among other tools. The Group's member companies are continuously improving the understandability of financial services.	Actual positive impact		X		X	X	X
Despite the efforts made, opportunities for development can always be identified, given the complexity of financial products, information obligations and their continuous changes.		Actual negative impacts		X		X	X	X

[30] ESRS: Information-related effects on consumers and/or end-users: Protection of privacy (ESRS 1 AR 16) In addition to the protection of personal data, this topic at the OTP Group also includes information security and cyber security.
Protection, as these are interrelated topics in the OTP Group, but not specifically mentioned in the ESRS.

[31] ESRS: Impacts related to information on consumers and/or end-users: Access to (quality) information (ESRS 1 AR 16).

Impact/Risk/Opportunity	Management (The report will elaborate further in line with disclosure requirements.)	Type of Impact/Risk/opportunity	Concentration of Impact, Risk, Opportunity			Time period		
			Up-stream	OTP Group	Down-stream[27]	Short-term	Medium-term	Long-term
Access to financial products and services[32]								
Access to financial products and services can support customers' well-being and prosperity. In addition, access for residents of disadvantaged areas and those in disadvantaged social situations is material. Ensuring access to financial products for disadvantaged customers requires careful consideration and strict regulation to protect the interests of depositors and prevent excessive indebtedness. The Banking Group can also support adequate housing, as mortgage loans are an important market segment in most areas of operation.	At the group level, the goal is to expand the range of products that are partially or fully available digitally, ensuring that these processes are as convenient and accessible to as many customers as possible. These solutions can also facilitate access for residents of disadvantaged areas. The Banking Group pays attention to imparting knowledge related to the use of online channels. Accessibility is continuously improving. In addition to market-based products, the Banking Group ensures the availability of significant state-supported mortgage loan schemes in several countries.	Actual positive impact		X		X	X	X
The accessibility cannot be considered comprehensive.		Actual negative impact		X		X	X	X
G1 Business Conduct								
Corporate culture, compliance, anti-money laundering								
The business conduct of OTP Group not only affects its direct partners and stakeholders but also influences the attitude of employees and customers towards ethical business conduct. Corporate governance characteristics and transparent decision-making are also important to investors. The fight against money laundering is essential for the banks within the Banking Group, aiming to prevent customers' attempts at money laundering. From a societal perspective, careful and prudent practice is particularly important. Implementing ethical business conduct and ensuring legal operations are of utmost importance to OTP Group.	The foundations and guidelines for ethical business conduct are summarized in the Code of Ethics OTP Group operates an ethics reporting system and conducts annual ethics training for all employees. The Banking Group conducts regular mandatory training to increase the awareness of its relevant employees on AML/CFT. OTP Bank operates a separate whistleblowing system in relation to AML/CFT.	Actual positive impact		X		X	X	X
Despite OTP Group's emphasis on striving for ethical business operations, non-compliances cannot be completely eliminated.		Actual negative impact		X			X	X
Non-compliance with laws and regulations can result in fines and reputational loss. Banks are also expected to play an active role in preventing money laundering. Violating anti-money laundering rules can lead to liquidity problems and the termination of correspondent banking relationships. Breaching business ethics rules can cause dissatisfaction and complaints from employees and business partners.		Risk		X		X	X	X
Corruption and bribery								
The effectiveness of corruption prevention impacts the efficiency of resource utilization. Due to its size, OTP Group's anti-corruption practices can influence economic morale (especially within the sector). The practices implemented by OTP Group have a positive impact.	The fight against corruption is supported by an anti-corruption training system, the application of an anti-corruption clause among contractual partners, the expansion of which at group level is in progress, and regular risk assessments.	Actual positive impact		X		X	X	X
Even with careful and constantly evolving practices, abuse can occur.		Potential negative impact		X		X	X	X

[32] ESRS: Social inclusion of consumers and/or end-users: Access to products and services (ESRS 1 AR 16)

Regarding the management of potential financial impacts of ESG risks, no provisions are made for ESG risks, and the management has not established a capital buffer for such risks. Based on the ECB's Novel Risk Recommendation, OTP Group has identified risks in Slovenia (OTP Bank Slovenia) and Bulgaria (DSK Bank) for which it has recognized impairment, which is also reflected in the consolidated IFRS 9 ECL (expected credit loss). The additional capital requirement related to climate risks is not material. ESG aspects are expected to be included in the rating models of the Group in 2025. In the context of operational risk loss data collection, an ESG flag is used if an ESG risk factor can be identified behind the given loss event. No significant losses were realized in 2024 concerning material topics. The analysis of expected financial impacts and the estimation of expected financial impacts will be carried out in 2025. OTP Group's risk management processes, prudent behaviour, and business planning practices ensure its resilience in managing sustainability impacts and risks, as well as leveraging opportunities. The Group conducted a @Stress test to assess the potential impacts of climate change justified by both regulatory and business considerations. No resilience assessment was conducted in connection to the biodiversity and ecosystem topic, as it was not financially material. In order to properly address complex environmental challenges, the involvement of the banking sector is necessary, making it likely that further resilience analyses will be warranted in the future. The Banking Group continuously monitors market opportunities to exploit them and keeps track of regulatory expectations to respond appropriately.

Sanctions Supplement: OTP Group's operations are affected by various anti-corruption laws, sanctions enacted and applied by the UN, the UK and the EU, as well as the United States. In addition, OTP Group's operations in Russia are subject to various Russian countersanctions. In the course of its business activities, OTP Group may come into contact with organizations whose employees are considered public officials.
Applicable sanctions may restrict OTP Group's dealings with certain sanctioned countries, individuals and organizations. OTP Group is particularly exposed to risks related to economic sanctions imposed by the United States, the EU and the United Kingdom against Russia and the Russian-occupied territories of Ukraine, as well as certain targeted Russian and Ukrainian organizations and individuals, as well as entities owned or controlled by such targeted organizations and individuals.
The imposition of any current or future sanctions may result in OTP Group's existing or future customers being subject to sanctions, directly or indirectly. If OTP Group is unable to cease providing services to sanctioned parties within the permitted wind-down period (if any) and such customers continue to be subject to sanctions and/or are included in sanction lists, this may also expose OTP Group to the risk of being subject to sanctions.
OTP Group cannot provide assurances that current or future sanctions targeting Russia, Russian companies and associated companies will not have a material impact on OTP Group's operations.
Litigation or investigations related to alleged or suspected violations of anti-corruption laws and sanctions may result in OTP Group being fined, restricted in its activities, revoked in its licenses, damaged in its reputation, and other adverse consequences on its activities and financial consequences. Additionally, violations of anti-corruption laws and sanctions regulations may result in financial disadvantage.
OTP Group also applies **entity-specific disclosures** to inform about the impacts of the following material topics:

- Water withdrawal is a material topic concerning the value chain, for which entity-specific disclosure will be developed later
- Direct impact drivers of biodiversity loss is a material topic concerning the value chain, for which entity-specific disclosure will be developed later
- Information security and data protection

- Access to (quality) information
- Access to financial products and services
- Corporate culture, compliance, anti-money laundering

1.5 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement and general reporting policy

ESRS 2 IRO-2

Among the disclosure requirements and data points in the thematic standards of ESRS, we report those that are related to the material sub-topics for OTP Group. To link material topics and disclosure requirements, we used the EFRAG ID 177 – Links between AR16 and Disclosure requirements guideline, and the identification of data points was based on the interpretation of data point expectations.

Data points

We report voluntarily reportable data points if the required information can be produced without significant effort or if we have previously reported them. In several cases, we utilize the phased introduction option specified in the ESRS, and these data points are not included in the report.
Regarding environmental topics, only Climate Change Mitigation is material – in terms of impact materiality – for our own operations. We do not consider data points related to other E1 (climate change) topics, E3 (water and marine resources), and E4 (biodiversity and ecosystems) topics relevant for our own operations. The material impacts and risks related to the S4 (Consumers and End-users) topic are specifically material for the clients and specific portion of clients of the (banks within the Group) (see @ESRS SBM-3). We report the related data points for these clients.

Policies, Actions and Targets

We disclose available policies, actions and targets in cases when they apply:

- to the entire OTP Group or nearly the entire group
- to the parent bank and subsidiaries, or for a smaller group that includes these member companies:
  - OTP Bank
  - Merkantil Bank
  - DSK Bank (Bulgaria)
  - OTP Bank Slovenia
  - OTP Bank Croatia
  - OTP Bank Serbia
  - Ipoteka Bank (Uzbekistan)
  - OTP Bank Ukraine
  - CKB (Montenegro)
  - OTP Bank Albania
  - OTP Bank Russia

Considering the mid-year sale of OTP Bank Romania, we do not present policies, actions, or objectives for this operation.
OTP Lakástakarék has a narrow scope of activity, focusing specifically on housing savings and loans, OTP Mortgage Bank focuses specifically on mortgage lending, the companies have a relatively small central organisation, and they use the branch network of the parent bank, the sales agents of OTP Financial Point Ltd. and other sales partners to carry out their specific business activities. The activities of the two subsidiary banks are therefore not presented separately.

- to asset managers in the context of Climate Change Mitigation, if relevant information has been disclosed in connection with SFDR[33] expectations, to ensure the information can be linked
  - OTP Fund Management,
  - OTP Real Estate Investment Fund Management,
  - PortfoLion Venture Capital Fund Management,
  - DSK Asset Management (Bulgaria),
  - OTP Invest (Croatia).
- and in case of Own Workforce (S1) topic, to companies with an active workforce of over 250 employees as of 31.12.2024:
  - the above banks,
  - CIL-Babér,

[33] Regulation (EU) No 2019/2088 of the European Parliament and of the Council of 27 November 2019 on disclosures in the financial services sector related to sustainability. The Ukrainian LLC AMC OTP Capital and the Serbian OTP INVEST DRUŠTVO ZA UPRAVLJANJE UCITS I ALTERNATIVNIM FONDOVIMA AD BEOGRAD are not covered, the Romanian OTP Asset Management was sold during the year and therefore no information is disclosed.

- OTP Factoring,
- Nádudvari Élelmiszer,
- NAGISZ.

We report if the Group has not adopted a policy, action, or target for the given sustainability issue if these are not available for any of the companies listed above.
Conditional data points for minimum disclosure requirements for policies, measures and objectives are reported if they are relevant to the policy, measure or objective presented.

Metrics

For metrics, our goal is to fully report the relevant data points. We have set a threshold value in exceptional cases, specifically for the @ESRS S1-16 Compensation Metrics (pay gap and total compensation) disclosure requirement. The threshold value was determined to reduce reporting burdens. We refrain from obtaining data for metric components if it is negligible under reasonable assumptions and would require significant effort to determine.
The metrics have not been validated by an external body other than the service provider providing the assurance.

Entity-Specific Disclosures

We deemed it necessary to define entity-specific disclosures for those material topics named in the @ESRS SBM-3 disclosure requirement that were supplemented with OTP Group-specific content compared to the list in ESRS 1 AR16, and for S4 topics, as ESRS currently does not define metrics for these topics. Regarding E3 and E4 topics, the Banking Group did not collect information during the reporting period that would adequately characterize these impacts. Regulatory expectations and data to be requested from clients are under development in these matters. After finalizing these and implementing data collection, we will define entity-specific disclosures (if sectoral ESRSs covering these topics are not published in the meantime) and report them.
Operational control: The situation where the enterprise is able to direct the operational activities and relationships of an entity, location, operation or asset.
Business relationships: Business relationships include relationships in the upstream and downstream value chain of the enterprise and are not limited to direct contractual relationships.
Where associates or joint ventures are accounted for using the equity method in IFRS financial statements and are part of the Group's value chain, the Bank includes information about them together with the approach applied to other business relationships in the value chain. When the Bank determines impact indicators, the data of the associate or joint venture is not limited to the equity share owned but takes into account the impacts that arise through business relationships related to the Group's products and services.
The management, executive and supervisory bodies of OTP Group are the Board of Directors, Supervisory Board and Audit Committee of OTP Bank Plc.
Gender distribution of members of the management, executive and supervisory bodies, the percentage of female and male board members compared to all members, based on the number of employees expressed in persons at the end of the year.
The proportion of independent members of the boards is the number of independent members divided by the total number of board members based on the year-end data.
Regarding the independence criteria for board members, the Bank considers the relevant provisions of Act V of 2013 on the Civil Code (Ptk.) to be guiding principles, the details of which are disclosed by the Bank in the document OTP Bank Plc. @Statement on the Independence of Board Members.
The breakdown by country applies to those countries where the Group has 50 or more employees and these employees represent at least 10% of the total number of employees.
The number of employees is given in chapter S1 according to employees, the year-end headcount is reported, including active employees.
Total income is the sum of Interest income and income similar to interest income + Income

from fees and commissions + Other operating income in the consolidated IFRS report for the year 2024.

2. Environmental Information

OTP Group aims to take a regional leadership role in financing a fair and gradual transition to a low carbon economy, and building a sustainable future. To achieve this objective, the Group significantly increased its green loan and corporate bond portfolio in 2024 and considers the preparation of its climate target-setting document[34] a milestone. Various aspects of the Group's risk management systems have been improved. OTP Group's objective is to reduce its environmental footprint resulting from its operations.

Material subtopic	Source of impact	Type of impact, risk, opportunity	Description of impact, risk, opportunity
E1 Climate change			
Mitigation of climate change Energy	entire OTP Group's own operations, loan portfolio, fund managers' investments	negative impact	Direct and indirect GHG emission
Mitigation of climate change Adaption to climate change Energy	loan portfolio, fund managers' investments	positive impact	Green financial products
Mitigation of climate change	entire OTP Group own operations	positive impact	Shaping mindsets through applied practices
Mitigation of climate change Adaptation to climate change Energy	loan portfolio	financial opportunity financial risk	Green financial products Conversion and physical risks in the portfolio
E2 Water and marine resources			
Water withdrawal	loan portfolio	negative impact	Financing sectors with high water abstraction
		positive impact	Green lending
		financial risk	Water dependency and environmental compliance risk in the portfolio
E4 Biodiversity and ecosystems			
Factors directly causing biodiversity loss	loan portfolio	negative impact	Funding for sectors with negative impacts on biodiversity and ecosystems
		potential positive impact	The possibility of setting expectations to encourage responsible behaviour by customers

For a more detailed description of the impacts, risks and opportunities and how to manage them, see @ESRS SBM-3 and the following sections of this chapter.

[34] This document defines a GHG target for 2030 in both absolute and relative terms, relating to category 15 of OTP Group's Scope 3 emissions, and identifies the main instruments to ensure the achievement of the target; however, it is not considered a transition plan according to the ESRS E1-1 disclosure requirement.

2.1 Disclosures under the EU Taxonomy Regulation

2.1.1 EU Taxonomy Regulation Disclosures

Information to be disclosed by companies covered by Articles 19a or 29a of Directive 2013/34/EU of the European Parliament and of the Council (EU) 2020/852 on environmentally sustainable economic activities, based on the methodology set out in Commission Delegated Regulation (EU) 2021/2178. For the credit institutions of OTP Group, the reporting is based on exposures and balance sheets corresponding to the scope of prudential consolidation according to Section 2 of Chapter 2 of Title II of Regulation (EU) No 575/2013, as set out in Annex V, point 1 of the current Commission Delegated Regulation (EU) No 2021/2178.
OTP Bank is committed to sustainable financing and social responsibility.

Mandatory Disclosures

The Taxonomy Regulation applies to financial market participants that make available financial products and undertakings which are subject to the obligation to publish a non-financial statement or a consolidated non-financial statement pursuant to Article 19a or Article 29a of Directive No. 2013/34/EU of the European Parliament and of the Council, respectively (Article 1 (b) and (c) of Chapter I of (EU) 2020/852). Pursuant to Article 8 of the Taxonomy Regulation, any undertaking which is subject to an obligation to disclose non-financial information pursuant to Article 19a or Article 29a of Directive No. 2013/34/EU shall include in its non-financial statement or consolidated non-financial statement information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable under Articles 3 and 9 of (EU) 2020/852 Regulation. OTP Group report is based on the exposures and balance sheet according to the scope of prudential consolidation in accordance with Regulation (EU) No. 575/2013, Title II, Chapter 2, Section 2 for the types of assets and accounting portfolios specified in point 1.1.2 of Annex V of Commission Delegated Regulation (EU) No. 2021/2178, including information on stock and flows, on transitional and enabling activities, and on specialized and general purpose lending.
The tables below present the consolidated information on OTP Group's mandatory KPIs under Regulation (EU) No. 2020/852 (Taxonomy Regulation), which have been prepared using the template published in Annex VI of Regulation No. 2021/2178. The gross carrying amount is based on the reference date of 31 December 2024.
OTP Group discloses the relevant KPIs on a consolidated basis, considering the scope of prudential consolidation, in accordance with Annex V, point 1.1.1 of EU 2021/2178. Accordingly, the exposures of the various subsidiaries, including those of fund managers and credit institutions, are part of the consolidated credit institution KPIs.
In regard to the publication of the table in Appendix 2 of the third Commission Notice of November 2024 (C/2024/6691 Commission Notice), OTP Group has chosen not to publish it in this reporting year, due to the late publication of the Notice. The publication of the table will be taken into account by OTP Group in the next reporting year. In the case of OTP Fund Management Ltd, the requirements for asset managers have been taken into account and the KPIs for asset managers is presented in a separate chapter.
The calculation of the main KPI indicators has been based on the best understanding of the requirements set out in the Delegated Regulation and the KPIs have been set accordingly.
In accordance with the legislation, the main KPI indicators are calculated as a proportion of total green assets, which is not equal to the Bank's total balance sheet. OTP Group's corporate loan portfolio is dominated by companies that are not subject to the obligation to disclose non-financial information under Articles 19a or 29a of Directive 2013/34/EU. As the eligible and aligned exposures to these

entities are not included in the mandatory disclosure, they are disclosed in the 000 section of this report. Exposures to non-EU subsidiary banks as defined above are also not covered by the mandatory reporting and are excluded from the calculation of the KPIs.

The qualitative disclosures required by Annex XI of the Delegated Regulation provide detailed information on the data and methodology used by the Bank.
The main stock and flow KPI indicators of OTP Group show the following changes compared to the previous year:

Mandatory GAR KPIs of OTP Group:

		2024		2023	
		Turnover	CapEx	Turnover	CapEx
Main KPI	Green asset ratio (GAR) Stock	0.10%	0.29%	0.05%	0.09%
Additional KPIs	Green asset ratio (GAR) Flow	0.13%	0.45 %	0.00%	0.01%

Significant efforts in green financing lead to improvements in key KPIs. For taxonomy aligned stocks, compared to the same data last year, the KPI shows a significant increase on both a CapEx and turnover basis. On turnover basis, our taxonomy aligned exposures increased from 0.05% to 0.10% and on a CapEx basis from 0.09% to 0.29% of GAR assets.
The proportion of assets included in the calculation of the main KPIs within the total balance sheet remained broadly unchanged at around 65%. Both GAR assets and total bank balance sheet data increased by more than 13%.
Taxonomy- eligible and aligned exposures to financial institutions improved severalfold, one of the main reasons being the wider availability of taxonomy reports for financial corporations. Taxonomy-eligible exposures reach 2.5%, while taxonomy-aligned exposures reach 0.10%.
Taxonomy-eligible exposures to non-financial corporates exceed 8.5% on a turnover basis and the taxonomy-aligned ratio on turnover basis is above 3%.
With respect to exposures to households, in case only the substantial contribution (SC) criterion is met, the Bank does not report these exposures as taxonomy-aligned exposures, given that it cannot currently demonstrate compliance with the DNSH conditions.
In line with the interpretation of the third Commission Notice (C/2024/6691 Commission Notice) published in November 2024, the Bank interprets this category as its entire gros exposure to gross households (not limited to the exposure of the subsidiary banks operating in the EU).

For gross household exposures, the taxonomy-eligible ratio is close to 28%, while for exposures secured by real estate the ratio is 57%. For retail motor vehicle finance, the taxonomy-eligible ratio is close to 37%. Tables 1 to 5 published in Annex VI to Regulation 2021/2178, which are to be published by credit institutions in accordance with Article 8 of the Taxonomy Regulation, are presented below.
In calculating the eligibility and alignment KPIs according to the EU taxonomy for the managed assets, the OTP Group is making a restatement regarding the data for the 2023 financial year:

1. Assets considered for GAR calculation – Asset management data provided in lines 55–57 of Revenue-based (T-1)

On a Turnover basis Template 1 – Assets for the calculation of GAR Turnover, Row 55 – Assets under management Total [gross] carrying amount is restated by **+ 1,526,575** million HUF.
On a Turnover basis Template 1 – Assets for the calculation of GAR Turnover, Row 55 – Assets under management [CCM+CCA] of which towards taxonomy relevant sectors (Taxonomy-eligible) is restated by **+ 124,025** million HUF.
On a Turnover basis Template 1 – Assets for the calculation of GAR Turnover, Row 55 – Assets under management (CCM+CCA) of which

environmentally sustainable (Taxonomy-aligned) is restated by **+ 9,337** million HUF.

2. Assets considered for GAR calculation – Asset management data provided in lines 55–57 of CapEx-based (T-1)

On a CapEx basis Template 1 – Assets for the calculation of GAR Turnover, Row 55 – Assets under management Total (gross) carrying amount is restated by **+ 1,526,575** million HUF.
On a CapEx basis Template 1 – Assets for the calculation of GAR Turnover, Row 55 – Assets under management (CCM+CCA) of which towards taxonomy relevant sectors (Taxonomy-eligible) is restated by **+ 314,352** million HUF.
On a CapEx basis Template 1 – Assets for the calculation of GAR Turnover, Row 55 – Assets under management [CCM+CCA] of which environmentally sustainable (Taxonomy-aligned) is restated by **+ 14,882** million HUF.

Therefore, the consolidated sustainability data for 2023 published in this report are not comparable to the data published in last year's report.
According to Article 8 of EU 2021/2178 financial undertakings and non-financial undertakings shall provide in the non-financial statement the key performance indicators covering the previous annual reporting period.
OTP Group presents its consolidated, comparative GAR KPIs for the previous reporting period, as required by Article 8, where Annex VI templates explicitly require the disclosure of the t-1 period. This included 'Template 1 – Assets for the calculation of GAR' and 'Template 3 – GAR KPI stock'.
OTP Group believes that these disclosure practices do not hinder the comparability of GAR KPI's as required by Article 8 of the legislation.

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation:

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI*	KPI**	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Main KPI	**Green asset ratio (GAR) stock**	**30,365**	**82,911**	**0.10%**	**0.29%**	**64.76%**	**27.43%**	**35.24%**

* Based on the Turnover KPI of the counterparty.
** Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used.
*** % of assets covered by the KPI over banks' total assets.

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	10,625	35,351	0.13%	0.45%	58.52%	19.93%	41.48%
	Financials guarantees	-	-					
	Asset under management	15,963	29,556	0.37%	0.68%			

Notes:
- Across the reporting templates: cells shaded in grey should not be reported.
- Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026.

1. Assets for the calculation of GAR – Turnover-based data:

	HUF million	Disclosure reference date 31 December 2024													
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,727,599	3,950,274	30,345	776	7,922	12,245	719	18	0	0	887	0	0	0
2	**Financial undertakings**	2,157,696	53,932	2,208	776	401	430	84	18	0	0	0	0	0	0
3	Credit institutions	1,724,030	50,227	2,123	724	379	423	60	13	0	0	0	0	0	0
4	Loans and advances	1,145,822	50,227	2,123	724	379	423	60	13	0	0	0	0	0	0
5	Debt securities, including UoP	578,186	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	22	0	0		0	0	0	0		0	0	0		0
7	Other financial corporations	433,666	3,706	85	52	22	6	23	5	0	0	0	0	0	0
8	of which investment firms	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
12	of which management companies	6,625	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	6,625	0	0		0	0	0	0		0	0	0		0
16	of which insurance undertakings	1,966	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,669	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	297	0	0		0	0	0	0		0	0	0		0
20	**Non-financial undertakings**	877,837	74,200	28,137	0	7,521	11,816	635	0	0	0	887	0	0	0
21	Loans and advances	859,587	71,778	27,662	0	7,432	11,816	259	0	0	0	887	0	0	0
22	Debt securities, including UoP	18,159	2,332	386	0	0	0	376	0	0	0	0	0	0	0
23	Equity instruments	91	90	90		90	0	0	0		0	0	0		0
24	**Households**	13,692,065	3,822,141	0	0	0	0	0	0	0	0				
25	of which loans collateralised by residential immovable property	6,014,461	3,422,059	0	0	0	0	0	0	0	0				
26	of which building renovation loans	127,700	127,014	0	0	0	0								
27	of which motor vehicle loans	743,909	273,068	0	0	0	0								
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	16,115	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Total (gross) carrying amount	Disclosure reference date 31 December 2024												
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	12,303,916													
33	**Financial and non-financial undertakings**	9,719,235													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346													
35	Loans and advances	6,561,296													
36	of which loans collateralised by commercial immovable property	0													
37	of which building renovation loans	0													
38	Debt securities	306,914													
39	Equity instruments	67,136													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889													
41	Loans and advances	2,767,099													
42	Debt securities	14,052													
43	Equity instruments	2,737													
44	**Derivatives**	50,334													
45	**On demand interbank loans**	379,446													
46	**Cash and cash-related assets**	667,872													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	1,487,029													
48	**Total GAR assets**	29,047,630	3,950,274	30,345	776	7,922	12,245	719	18	0	0	887	0	0	0
49	**Assets not covered for GAR calculation**	15,804,501													
50	**Central governments and Supranational issuers**	8,149,592													
51	**Central banks' exposure**	7,012,747													
52	**Trading book**	642,162													
53	**Total assets**	44,852,131	3,950,274	30,345	776	7,922	12,245	719	18	0	0	887	0	0	0
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	7,206	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	4,346,946	80,313	14,452	0	1,552	12,899	2,146	1,266	0	1,262	112	37	0	26
56	Of which debt securities	551,901	41,261	0	0	0	0	239	0	0	0	46,449	0	0	0
57	Of which equity instruments	526,720	39,053	9,822	0	898	8,924	1,907	14	0	184	56,560	133	0	22

	HUF million	Disclosure reference date 31 December 2024																	
			Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
		Total (gross) carrying amount	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,727,599	569	2	0	0	5,767	0	0	0	17,065	0	0	0	3,975,280	30,365	776	7,922	12,245
2	**Financial undertakings**	2,157,696	108	0	0	0	0	0	0	0	0	0	0	0	54,124	2,226	776	401	430
3	Credit institutions	1,724,030	0	0	0	0	0	0	0	0	0	0	0	0	50,287	2,136	724	379	423
4	Loans and advances	1,145,822	0	0	0	0	0	0	0	0	0	0	0	0	50,287	2,136	724	379	423
5	Debt securities, including UoP	578,186	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	22	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	433,666	108	0	0	0	0	0	0	0	0	0	0	0	3,837	90	52	22	6
8	of which investment firms	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	6,625	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	6,625	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	1,966	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,669	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	297	0	0		0	0	0		0	0	0		0	0	0		0	0
20	**Non-financial undertakings**	877,837	461	2	0	0	5,767	0	0	0	17,065	0	0	0	99,015	28,139	0	7,521	11,816
21	Loans and advances	859,587	461	2	0	0	5,767	0	0	0	17,065	0	0	0	96,217	27,663	0	7,432	11,816
22	Debt securities, including UoP	18,159	0	0	0	0	0	0	0	0	0	0	0	0	2,708	386	0	0	0
23	Equity instruments	91	0	0		0	0	0		0	0	0		0	90	90		90	0
24	**Households**	13,692,065	0	0	0	0									3,822,141	0	0	0	0
25	of which loans collateralised by residential immovable property	6,014,461	0	0	0	0									3,422,059	0	0	0	0
26	of which building renovation loans	127,700													127,014	0	0	0	0
27	of which motor vehicle loans	743,909													273,068	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	16,115	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2024																	
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	12,303,916																	
33	**Financial and non-financial undertakings**	9,719,235																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346																	
35	Loans and advances	6,561,296																	
36	of which loans collateralised by commercial immovable property	0																	
37	of which building renovation loans	0																	
38	Debt securities	306,914																	
39	Equity instruments	67,136																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889																	
41	Loans and advances	2,767,099																	
42	Debt securities	14,052																	
43	Equity instruments	2,737																	
44	**Derivatives**	50,334																	
45	**On demand interbank loans**	379,446																	
46	**Cash and cash-related assets**	667,872																	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	1,487,029																	
48	**Total GAR assets**	29,047,630	569	2	0	0	5,767	0	0	0	17,065	0	0	0	3,975,280	30,365	776	7,922	12,245
49	**Assets not covered for GAR calculation**	15,804,501																	
50	**Central governments and Supranational issuers**	8,149,592																	
51	**Central banks' exposure**	7,012,747																	
52	**Trading book**	642,162																	
53	**Total assets**	44,852,131	569	2	0	0	5,767	0	0	0	17,065	0	0	0	3,975,280	30,365	776	7,922	12,245
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	7,206	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	4,346,946	7,019	185	0	73	4,351	22	0	1	1,914	0	0	0	95,855	15,963	0	1,552	14,262
56	Of which debt securities	551,901	300	0	0	0	19	0	0	0	0	0	0	0	88,268	0	0	0	0
57	Of which equity instruments	526,720	5,051	184	0	73	186	22	0	1	1,914	0	0	0	104,670	10,174	0	1,178	9,204

1. Assets for the calculation of GAR – Turnover-based data (T–1):

	HUF million	Disclosure reference date 31 December 2023													
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	13,420,637	3,018,478	12,435	0	974	1,007	15	0	0	0	0	0	0	0
2	**Financial undertakings**	2,012,646	4,288	0	0	0	0	0	0	0	0	0	0	0	0
3	Credit institutions	1,301,023	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	854,447	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	446,575	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
7	Other financial corporations	711,623	4,288	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	59,625	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	59,624	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	1	0	0		0	0	0	0		0	0	0		0
12	of which management companies	26,032	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	26,032	0	0		0	0	0	0		0	0	0		0
16	of which insurance undertakings	1,797	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,795	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	1	0	0		0	0	0	0		0	0	0		0
20	**Non-financial undertakings**	176,625	21,188	12,435	0	974	1,007	15	0	0	0	0	0	0	0
21	Loans and advances	60,818	10,110	6,132	0	0	0	0	0	0	0	0	0	0	0
22	Debt securities, including UoP	115,807	11,078	6,304	0	974	1,007	15	0	0	0	0	0	0	0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
24	**Households**	11,231,366	2,993,002	0	0	0	0	0	0	0	0				
25	of which loans collateralised by residential immovable property	4,524,697	2,694,148	0	0	0	0	0	0	0	0				
26	of which building renovation loans	127,689	127,416	0	0	0	0	0	0	0	0				
27	of which motor vehicle loans	446,413	171,438	0	0	0	0								
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	9,789	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2023													
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	11,562,435													
33	**Financial and non-financial undertakings**	9,385,343													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,860,587													
35	Loans and advances	6,712,884													
36	of which loans collateralised by commercial immovable property														
37	of which building renovation loans														
38	Debt securities	146,932													
39	Equity instruments	771													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,524,756													
41	Loans and advances	2,492,214													
42	Debt securities	30,472													
43	Equity instruments	2,070													
44	**Derivatives**	41,967													
45	**On demand interbank loans**	574,648													
46	**Cash and cash-related assets**	605,799													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	954,677													
48	**Total GAR assets**	25,679,052	3,018,478	12,435	0	974	1,007	15	0	0	0	0	0	0	0
49	**Assets not covered for GAR calculation**	13,930,092													
50	**Central governments and Supranational issuers**	6,307,758													
51	**Central banks' exposure**	7,401,137													
52	**Trading book**	221,197													
53	**Total assets**	39,609,144	3,018,478	12,435	0	974	0	0	0	0	0	0	0	0	0
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	173,787	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management*	3,177,939	144,741	10,195		1,038	9,157	1,566	1,175		1,175				
56	Of which debt securities	266,078	1,752	1,752		331	1,421	717	717		717				0
57	Of which equity instruments	359,496	8,443	8,443		707	7,736	14	0		0				

* Restated

	HUF million	Disclosure reference date 31 December 2023																	
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	13,420,637	0	0	0	0	0	0	0	0	0	0	0	0	3,018,493	12,435	0	974	1,007
2	**Financial undertakings**	2,012,646	0	0	0	0	0	0	0	0	0	0	0	0	4,288	0	0	0	0
3	Credit institutions	1,301,023	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	854,447	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	446,575	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	711,623	0	0	0	0	0	0	0	0	0	0	0	0	4,288	0	0	0	0
8	of which investment firms	59,625	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	59,624	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	1	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	26,032	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	26,032	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	1,797	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,795	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	1	0	0		0	0	0		0	0	0		0	0	0		0	0
20	**Non-financial undertakings**	176,625	0	0	0	0	0	0	0	0	0	0	0	0	21,203	12,435	0	974	1,007
21	Loans and advances	60,818	0	0	0	0	0	0	0	0	0	0	0	0	10,110	6,132	0	0	0
22	Debt securities, including UoP	115,807	0	0	0	0	0	0	0	0	0	0	0	0	11,093	6,304	0	974	1,007
23	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	**Households**	11,231,366	0	0	0	0									2,993,002	0	0	0	0
25	of which loans collateralised by residential immovable property	4,524,697	0	0	0	0									2,694,148	0	0	0	0
26	of which building renovation loans	127,689													127,416	0	0	0	0
27	of which motor vehicle loans	446,413													171,438	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	9,789	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Total (gross) carrying amount	Disclosure reference date 31 December 2023																
			Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	11,562,435																	
33	**Financial and non-financial undertakings**	9,385,343																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,860,587																	
35	Loans and advances	6,712,884																	
36	of which loans collateralised by commercial immovable property																		
37	of which building renovation loans																		
38	Debt securities	146,932																	
39	Equity instruments	771																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,524,756																	
41	Loans and advances	2,492,214																	
42	Debt securities	30,472																	
43	Equity instruments	2,070																	
44	**Derivatives**	41,967																	
45	**On demand interbank loans**	574,648																	
46	**Cash and cash-related assets**	605,799																	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	954,677																	
48	**Total GAR assets**	25,679,052	0	0	0	0	0	0	0	0	0	0	0	0	3,018,493	12,435	0	974	1,007
49	**Assets not covered for GAR calculation**	13,930,092																	
50	**Central governments and Supranational issuers**	6,307,758																	
51	**Central banks' exposure**	7,401,137																	
52	**Trading book**	221,197																	
53	**Total assets**	39,609,144	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	173,787	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	3,177,939													146,307	11,371		1,038	10,332
56	Of which debt securities	266,078													2,469	2,469		1,048	2,138
57	Of which equity instruments	359,496													8,457	8,443		707	7,736

1. Assets for the calculation of GAR – CapEx-based:

	HUF million	Disclosure reference date 31 December 2024													
		Total (gross) carrying amount	Climate Change Mitigation (CCM) of which towards taxonomy relevant sectors (Taxonomy-eligible)					Climate Change Adaptation (CCA) of which towards taxonomy relevant sectors (Taxonomy-eligible)				Water and marine resources (WTR) of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,727,599	4,002,781	80,382	767	45,373	10,740	304	38	0	0	33	0	0	0
2	**Financial undertakings**	2,157,696	53,508	3,106	756	719	695	109	22	0	0	0	0	0	0
3	Credit institutions	1,724,030	50,014	2,979	704	675	688	99	22	0	0	0	0	0	0
4	Loans and advances	1,145,822	50,014	2,979	704	675	688	99	22	0	0	0	0	0	0
5	Debt securities, including UoP	578,186	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	22	0	0		0	0	0	0		0	0	0		0
7	Other financial corporations	433,666	3,494	127	52	44	8	10	0	0	0	0	0	0	0
8	of which investment firms	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0
12	of which management companies	6,625	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	6,625	0	0		0	0	0	0		0	0	0		0
16	of which insurance undertakings	1,966	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,669	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	297	0	0		0	0	0	0		0	0	0		0
20	**Non-financial undertakings**	877,837	127,133	77,275	11	44,654	10,045	195	16	0	0	33	0	0	0
21	Loans and advances	859,587	124,733	76,343	11	44,573	10,045	90	16	0	0	33	0	0	0
22	Debt securities, including UoP	18,159	2,318	851	0	0	0	105	0	0	0	0	0	0	0
23	Equity instruments	91	81	81		81	0	0	0		0	0	0		0
24	**Households**	13,692,065	3,822,141	0	0	0	0	0	0	0	0				
25	of which loans collateralised by residential immovable property	6,014,461	3,422,059	0	0	0	0	0	0	0	0				
26	of which building renovation loans	127,700	127,014	0	0	0	0	0	0	0	0				
27	of which motor vehicle loans	743,909	273,068	0	0	0	0								
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	16,115	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2024													
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	12,303,916													
33	**Financial and non-financial undertakings**	9,719,235													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346													
35	Loans and advances	6,561,296													
36	of which loans collateralised by commercial immovable property	0													
37	of which building renovation loans	0													
38	Debt securities	306,914													
39	Equity instruments	67,136													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889													
41	Loans and advances	2,767,099													
42	Debt securities	14,052													
43	Equity instruments	2,737													
44	**Derivatives**	50,334													
45	**On demand interbank loans**	379,446													
46	**Cash and cash-related assets**	667,872													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	1,487,029													
48	**Total GAR assets**	29,047,630	4,002,781	80,382	767	45,373	10,740	304	38	0	0	33	0	0	0
49	**Assets not covered for GAR calculation**	15,804,501													
50	**Central governments and Supranational issuers**	8,149,592													
51	**Central banks' exposure**	7,012,747													
52	**Trading book**	642,162													
53	**Total assets**	44,852,131	4,002,781	80,382	767	45,373	10,740	304	38	0	0	33	0	0	0
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	7,206	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	4,346,946	104,814	27,998	0	5,363	22,635	5,351	1,334	0	1,331	205	169	0	142
56	Of which debt securities	513,985	46,449	0	0	0	0	300	0	0	0	19	0	0	0
57	Of which equity instruments	526,720	56,560	18,606	0	3,251	15,356	5,051	1,329	0	1,328	186	75	0	75

	HUF million	Disclosure reference date 31 December 2024																	
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,727,599	5,127	2,492	0	0	3,825	0	0	0	3	0	0	0	4,012,073	82,911	767	45,373	10,740
2	**Financial undertakings**	2,157,696	108	0	0	0	0	0	0	0	0	0	0	0	53,725	3,128	756	719	695
3	Credit institutions	1,724,030	0	0	0	0	0	0	0	0	0	0	0	0	50,113	3,001	704	675	688
4	Loans and advances	1,145,822	0	0	0	0	0	0	0	0	0	0	0	0	50,113	3,001	704	675	688
5	Debt securities, including UoP	578,186	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	22	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	433,666	108	0	0	0	0	0	0	0	0	0	0	0	3,612	127	52	44	8
8	of which investment firms	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	1,934	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	6,625	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	6,625	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	1,966	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,669	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	297	0	0		0	0	0		0	0	0		0	0	0		0	0
20	**Non-financial undertakings**	877,837	5,019	2,492	0	0	3,825	0	0	0	3	0	0	0	136,207	79,783		44,654	10,045
21	Loans and advances	859,587	5,007	2,492	0	0	3,825	0	0	0	3	0	0	0	133,691	78,851	11	44,573	10,045
22	Debt securities, including UoP	18,159	12	0	0	0	0	0	0	0	0	0	0	0	2,435	851	0	0	0
23	Equity instruments	91	0	0		0	0	0		0	0	0		0	81	81		81	0
24	**Households**	13,692,065	0	0	0	0									3,822,141	0	0	0	0
25	of which loans collateralised by residential immovable property	6,014,461	0	0	0	0									3,422,059	0	0	0	0
26	of which building renovation loans	127,700	0	0	0	0									127,014	0	0	0	0
27	of which motor vehicle loans	743,909													273,068	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	16,115	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	HUF million	Total (gross) carrying amount	Disclosure reference date 31 December 2024																
			Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	12,303,916																	
33	**Financial and non-financial undertakings**	9,719,235																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346																	
35	Loans and advances	6,561,296																	
36	of which loans collateralised by commercial immovable property	0																	
37	of which building renovation loans	0																	
38	Debt securities	306,914																	
39	Equity instruments	67,136																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889																	
41	Loans and advances	2,767,099																	
42	Debt securities	14,052																	
43	Equity instruments	2,737																	
44	**Derivatives**	50,334																	
45	**On demand interbank loans**	379,446																	
46	**Cash and cash-related assets**	667,872																	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	1,487,029																	
48	**Total GAR assets**	29,047,630	5,127	2,492	0	0	3,825	0	0	0	3	0	0	0	4,012,073	82,911	767	45,373	10,740
49	**Assets not covered for GAR calculation**	15,804,501																	
50	**Central governments and Supranational issuers**	8,149,592																	
51	**Central banks' exposure**	7,012,747																	
52	**Trading book**	642,162																	
53	**Total assets**	44,852,131	5,127	0	0	0	0	0	0	0	0	0	0	0	4,008,248	80,419	767	45,373	10,740
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	7,206	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	4,346,946	5,787	51		24	2,397	1	0	1	7	2	0	0	118,560	29,556	0	5,363	24,133
56	Of which debt securities	513,985	3	0		0	3	0	0	0	0	0	0	0	46,773	0	0	0	0
57	Of which equity instruments	526,720	5,784	51		24	2,394	6	0	1	2,394	2	0	2	72,369	20,069	0	4,681	16,786

1. Assets for the calculation of GAR – CapEx-based (T–1):

	HUF million	Disclosure reference date 31 December 2023													
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	13,420,637	3,038,192	23,138	0	0	0	0	0	0	0	0	0	0	0
2	**Financial undertakings**	2,012,646	3,358	0	0	0	0	0	0	0	0	0	0	0	0
3	Credit institutions	1,301,023	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	854,447	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	446,575	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
7	Other financial corporations	711,623	3,358	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	59,625	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	59,624	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	1	0	0		0	0	0	0		0	0	0		0
12	of which management companies	26,032	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	26,032	0	0		0	0	0	0		0	0	0		0
16	of which insurance undertakings	1,797	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,795	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	1	0	0		0	0	0	0		0	0	0		0
20	**Non-financial undertakings**	176,625	41,833	23,138	0	0	0	0	0	0	0	0	0	0	0
21	Loans and advances	60,818	21,221	13,844	0	0	0	0	0	0	0	0	0		0
22	Debt securities, including UoP	115,807	20,612	9,293	0	0	0	0	0	0	0	0	0		0
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0
24	**Households**	11,231,366	2,993,002	0	0	0	0	0	0	0	0				
25	of which loans collateralised by residential immovable property	4,524,697	2,694,148	0	0	0	0	0	0	0	0				
26	of which building renovation loans	127,689	127,416	0	0	0	0	0	0	0	0				
27	of which motor vehicle loans	446,413	171,438	0	0	0	0								
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0			
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0			
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0			
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	9,789	0	0	0	0	0	0	0	0	0	0			

	HUF million	Total (gross) carrying amount	Disclosure reference date 31 December 2023												
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
					of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	11,562,435													
33	**Financial and non-financial undertakings**	9,385,343													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,860,587													
35	Loans and advances	6,712,884													
36	of which loans collateralised by commercial immovable property														
37	of which building renovation loans														
38	Debt securities	146,932													
39	Equity instruments	771													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,524,756													
41	Loans and advances	2,492,214													
42	Debt securities	30,472													
43	Equity instruments	2,070													
44	**Derivatives**	41,967													
45	**On demand interbank loans**	574,648													
46	**Cash and cash-related assets**	605,799													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	954,677													
48	**Total GAR assets**	25,679,052	2,993,002												
49	**Assets not covered for GAR calculation**	13,930,092													
50	**Central governments and Supranational issuers**	6,307,758													
51	**Central banks' exposure**	7,401,137													
52	**Trading book**	221,197													
53	**Total assets**	39,609,144	2,993,002												
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations															
54	Financial guarantees	173,787	0												
55	Assets under management	3,177,939	339,475	19,267		3,988	15,279	6,673	1,745		1,742				
56	Of which debt securities	266,078	3,648	3,648		1,281	2,367	5	5		2				
57	Of which equity instruments	359,496	15,619	15,619		2,707	12,913	1,740	1,740		1,740				

	HUF million	Disclosure reference date 31 December 2023																	
		Total (gross) carrying amount	Circular economy (CE) – of which towards taxonomy relevant sectors (Taxonomy-eligible)	CE – of which environmentally sustainable (Taxonomy-aligned)	CE – of which use of proceeds	CE – of which enabling	Pollution (PPC) – of which towards taxonomy relevant sectors (Taxonomy-eligible)	PPC – of which environmentally sustainable (Taxonomy-aligned)	PPC – of which use of proceeds	PPC – of which enabling	Biodiversity and Ecosystems (BIO) – of which towards taxonomy relevant sectors (Taxonomy-eligible)	BIO – of which environmentally sustainable (Taxonomy-aligned)	BIO – of which use of proceeds	BIO – of which enabling	Total (CCM + CCA + WTR + CE + PPC + BIO) – of which towards taxonomy relevant sectors (Taxonomy-eligible)	Total – of which environmentally sustainable (Taxonomy-aligned)	Total – of which use of proceeds	Total – of which transitional	Total – of which enabling
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	13,420,637	0	0	0	0	0	0	0	0	0	0	0	0	3,038,192	23,138	0	0	0
2	**Financial undertakings**	2,012,646	0	0	0	0	0	0	0	0	0	0	0	0	3,358	0	0	0	0
3	Credit institutions	1,301,023	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	854,447	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	446,575	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
7	Other financial corporations	711,623	1	0	0	0	0	0	0	0	0	0	0	0	3,358	0	0	0	0
8	of which investment firms	59,625	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	59,624	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	1	0	0		0	0	0		0	0	0		0	0	0		0	0
12	of which management companies	26,032	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	26,032	0	0		0	0	0		0	0	0		0	0	0		0	0
16	of which insurance undertakings	1,797	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	1,795	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	1	0	0		0	0	0		0	0	0		0	0	0		0	0
20	**Non-financial undertakings**	176,625	0	0	0	0	0	0	0	0	0	0	0	0	41,833	23,138	0	0	0
21	Loans and advances	60,818	0	0		0	0	0	0	0	0	0	0	0	21,221	13,844	0	0	0
22	Debt securities, including UoP	115,807	0	0		0	0	0	0	0	0	0	0	0	20,612	9,293	0	0	0
23	Equity instruments	0	0	0		0	0	0		0	0	0		0	0	0		0	0
24	**Households**	11,231,366	0	0	0	0									2,993,002	0	0	0	0
25	of which loans collateralised by residential immovable property	4,524,697													2,694,148	0	0	0	0
26	of which building renovation loans	127,689													127,416	0	0	0	0
27	of which motor vehicle loans	446,413													171,438	0	0	0	0
28	**Local governments financing**	0	0				0				0				0	0	0	0	0
29	Housing financing	0	0				0				0				0	0	0	0	0
30	Other local government financing	0	0				0				0				0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	9,789	0				0				0				0	0	0	0	0

	HUF million	Disclosure reference date 31 December 2023																	
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
					of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	11,562,435																	
33	**Financial and non-financial undertakings**	9,385,343																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,860,587																	
35	Loans and advances	6,712,884																	
36	of which loans collateralised by commercial immovable property																		
37	of which building renovation loans																		
38	Debt securities	146,932																	
39	Equity instruments	771																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,524,756																	
41	Loans and advances	2,492,214																	
42	Debt securities	30,472																	
43	Equity instruments	2,070																	
44	**Derivatives**	41,967																	
45	**On demand interbank loans**	574,648																	
46	**Cash and cash-related assets**	605,799																	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	954,677																	
48	**Total GAR assets**	25,679,052													3,038,192	23,138			
49	**Assets not covered for GAR calculation**	13,930,092																	
50	**Central governments and Supranational issuers**	6,307,758																	
51	**Central banks' exposure**	7,401,137																	
52	**Trading book**	221,197																	
53	**Total assets**	39,609,144													3,038,192	23,138			
	Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations																		
54	Financial guarantees	173,787																	
55	Assets under management*	3,177,939													346,148	21,012		3,988	17,021
56	Of which debt securities	266,078													3,653	3,653		1,283	2,369
57	Of which equity instruments	359,496													17,359	17,359		4,446	14,652

* Restated

2. GAR Sector information – Turnover-based data:

	Breakdown by sector – NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (WTR)	HUF million	of which environmentally sustainable (WTR)
1	7022	131	3							24			
2	2932	1,756	35										
3	2511	515	2			3							
4	1920	42	2							1			
5	4711	40	8										
6	4730	379	379										
7	4646	2,048											
8	2120	376				376							
9	1062	3,444	3,251										
10	2016	20	1							4			
11	3811	64	2							12			
12	2059	2,524	62							467			
13	4531	19	19										
14	2720	0											
15	1039	4,950											
16	3511	9,066	1,994										
17	4519	72	2							13			
18	4931	4,562	2,199							251			
19	3523	224	205										
20	6420	5,502	5,044										
21	4950												
22	2910	0											
23	5510	309											
24	7010	15,274	10,266										
25	8020	15	0							3			
26	5310	811	396										
27	6492	587	14							109			
28	3514	0	0										
29	2442	1,065	1,065										
30	3513	1,010	1,008										
31	6110	176	2										
32	6120	36											
33	6203	0											
34	4520	660											
35	1082	23											
36	2351	2,293	210										
37	2221	1,779											
38	0520	0	0										
39	3522	7	4							0			
40	6820	21	19										
41	6831	5,642	1,124										
42	3020	17	8										
43	3512	8,691	794										
44	2443	8	8										
45	4671	13	0							2			
46	6920	1	1										
47	8220	8	8										
48	6209	18	0										
49	2012					0	0						
50	6201					256							

	Breakdown by sector – NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	7022													156	3		
2	2932													1,756	35		
3	2511													518	2		
4	1920													43	2		
5	4711													40	8		
6	4730													379	379		
7	4646													2,048			
8	2120					0				0				753			
9	1062													3,444	3,251		
10	2016													24	1		
11	3811													76	2		
12	2059													2,992	62		
13	4531	0												19	19		
14	2720													0			
15	1039	33				2,772								7,755			
16	3511													9,066	1,994		
17	4519													86	2		
18	4931													4,813	2,199		
19	3523													224	205		
20	6420													5,502	5,044		
21	4950																
22	2910													0			
23	5510									17,063				17,372			
24	7010	287				2,995								18,556	10,266		
25	8020													18	0		
26	5310													811	396		
27	6492													696	14		
28	3514													0	0		
29	2442													1,065	1,065		
30	3513													1,010	1,008		
31	6110	89												265	2		
32	6120	11												47			
33	6203													0			
34	4520													660			
35	1082	4								2				29			
36	2351	11	2											2,304	211		
37	2221													1,779			
38	0520													0	0		
39	3522					0				1				8	4		
40	6820													21	19		
41	6831													5,642	1,124		
42	3020													17	8		
43	3512													8,691	794		
44	2443													8	8		
45	4671													16	0		
46	6920													1	1		
47	8220													8	8		
48	6209	25												43	0		
49	2012													0	0		
50	6201													256			

2. GAR Sector information – CapEx-based:

	Breakdown by sector – NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCM)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (CCA)	HUF million	of which environmentally sustainable (WTR)	HUF million	of which environmentally sustainable (WTR)
1	7022	326	139										
2	2932	1,826	56										
3	2511	326	3			13							
4	1920	179	89										
5	4711	1,126	185										
6	4730	5,976	5,976										
7	4646	2,048											
8	2120	359	254			105							
9	1062	3,958	3,617										
10	2016	50	21										
11	3811	160	68										
12	2059	6,264	2,680										
13	4531	49	45										
14	2720	0											
15	1039	7,920								33			
16	3511	9,066	5,077										
17	4519	179	77										
18	4931	6,242	3,976										
19	3523	559	522										
20	6420	13,755	12,838										
21	4950												
22	2910	0	0										
23	5510	6,078											
24	7010	36,501	35,490										
25	8020	38	16										
26	5310	268	34										
27	6492	1,456	623										
28	3514	1	1										
29	2442	584	584			16	16						
30	3513	1,029	974										
31	6110	133	15										
32	6120	71											
33	6203	20											
34	4520	660											
35	1082	501											
36	2351	1,990	189										
37	2221	1,779											
38	0520	0	0										
39	3522	9	9										
40	6820	52	49										
41	6831	5,375	1,570										
42	3020	15	5										
43	3512	9,991	2,022										
44	2443	11	11										
45	4671	25	14										
46	6920	3	3										
47	8220	32	31										
48	6209	4	4										
49	2012					0	0						
50	6201	137	8			61							

	Breakdown by sector – NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (CE)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (PPC)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	HUF million	of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	7022	65												391	139		
2	2932													1,826	56		
3	2511													339	3		
4	1920	3												182	89		
5	4711													1,126	185		
6	4730													5,976	5,976		
7	4646													2,048			
8	2120					0								464	254		
9	1062													3,958	3,617		
10	2016	10												60	21		
11	3811	32												192	68		
12	2059	1,247												7,511	2,680		
13	4531													49	45		
14	2720													0			
15	1039					858								8,811			
16	3511													9,066	5,077		
17	4519	36												215	77		
18	4931	669												6,911	3,976		
19	3523													559	522		
20	6420													13,755	12,838		
21	4950																
22	2910													0	0		
23	5510	115												6,193			
24	7010					2,967								39,468	35,490		
25	8020	8												46	16		
26	5310													268	34		
27	6492	290												1,746	623		
28	3514													1	1		
29	2442	2,451	2,451											3,050	3,050		
30	3513													1,029	974		
31	6110													133	15		
32	6120	20												91			
33	6203													20			
34	4520													660			
35	1082													501			
36	2351	41	41											2,031	230		
37	2221													1,779			
38	0520													0	0		
39	3522									3				12	9		
40	6820													52	49		
41	6831	35												5,410	1,570		
42	3020													15	5		
43	3512													9,991	2,022		
44	2443													11	11		
45	4671													25	14		
46	6920													3	3		
47	8220													32	31		
48	6209													4	4		
49	2012													0	0		
50	6201													198	8		

3. GAR KPI Stock – Turnover-based data:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	23.6%	0.2%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	2.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	2.9%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	4.4%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	8.5%	3.2%	0.0%	0.9%	1.4%	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
21	Loans and advances	8.4%	3.2%	0.0%	0.9%	1.4%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	12.8%	2.1%	0.0%	0.0%	0.0%	2.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	98.5%	98.5%		98.5%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
24	**Households**	27.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	56.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	99.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	36.7%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	13.6%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																	Proportion of total assets covered
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	23.8%	0.2%	0.0%	0.1%	0.1%	37.29%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.5%	0.1%	0.0%	0.0%	0.0%	4.81%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.9%	0.1%	0.0%	0.0%	0.0%	3.84%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.4%	0.2%	0.1%	0.0%	0.0%	2.55%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.29%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.97%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.01%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.01%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.1%	0.0%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	1.9%	0.0%	0.0%	0.0%	11.3%	3.2%	0.0%	0.9%	1.4%	1.96%
21	Loans and advances	0.1%	0.0%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	2.0%	0.0%	0.0%	0.0%	11.2%	3.2%	0.0%	0.9%	1.4%	1.92%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.9%	2.1%	0.0%	0.0%	0.0%	0.04%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	98.5%	98.5%		98.5%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									27.9%	0.0%	0.0%	0.0%	0.0%	30.53%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									56.9%	0.0%	0.0%	0.0%	0.0%	13.41%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									99.5%	0.0%	0.0%	0.0%	0.0%	0.28%
27	of which motor vehicle loans													36.7%	0.0%	0.0%	0.0%	0.0%	1.66%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.04%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	13.7%	0.1%	0.0%	0.0%	0.0%	64.76%

3. GAR KPI Stock – CapEx-based:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	23.9%	0.5%	0.0%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	2.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	2.9%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	4.4%	0.3%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	14.5%	8.8%	0.0%	5.1%	1.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	Loans and advances	14.5%	8.9%	0.0%	5.2%	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	12.8%	4.7%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	88.7%	88.7%		88.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	27.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	56.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	99.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	36.7%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	13.8%	0.3%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	24.0%	0.5%	0.0%	0.3%	0.1%	37.29%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.5%	0.1%	0.0%	0.0%	0.0%	4.81%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.9%	0.2%	0.0%	0.0%	0.0%	3.84%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.4%	0.3%	0.1%	0.1%	0.1%	2.55%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.29%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%	0.97%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.01%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.01%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.6%	0.3%	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	15.5%	9.1%	0.0%	5.1%	1.1%	1.96%
21	Loans and advances	0.6%	0.3%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	15.6%	9.2%	0.0%	5.2%	1.2%	1.92%
22	Debt securities, including UoP	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	13.4%	4.7%	0.0%	0.0%	0.0%	0.04%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	88.7%	88.7%		88.7%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									27.9%	0.0%	0.0%	0.0%	0.0%	30.53%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									56.9%	0.0%	0.0%	0.0%	0.0%	13.41%
26	of which building renovation loans													99.5%	0.0%	0.0%	0.0%	0.0%	0.28%
27	of which motor vehicle loans													36.7%	0.0%	0.0%	0.0%	0.0%	1.66%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.04%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	13.8%	0.3%	0.0%	0.2%	0.0%	64.76%

3. GAR KPI Stock – Turnover-based data (T–1):

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2023												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	22.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	12.0%	7.0%	0.0%	0.6%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	Loans and advances	16.6%	10.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	9.6%	5.4%	0.0%	0.8%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%
24	**Households**	26.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	59.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	99.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	38.4%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	10.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2023																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	22.5%	0.1%	0.0%	0.0%	0.0%	29.92%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	4.49%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.90%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.91%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.00%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	1.59%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.13%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.13%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.06%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.06%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	12.0%	7.0%	0.0%	0.6%	0.6%	0.39%
21	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	16.6%	10.1%	0.0%	0.0%	0.0%	0.14%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	9.6%	5.4%	0.0%	0.8%	0.9%	0.26%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									26.7%	0.0%	0.0%	0.0%	0.0%	25.04%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									59.5%	0.0%	0.0%	0.0%	0.0%	10.09%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									99.8%	0.0%	0.0%	0.0%	0.0%	0.28%
27	of which motor vehicle loans													38.4%	0.0%	0.0%	0.0%	0.0%	1.00%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.02%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	10.4%	0.0%	0.0%	0.0%	0.0%	64.83%

3. GAR KPI Stock – CapEx-based (T–1):

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2023												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	22.6%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	23.7%	13.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	Loans and advances	34.9%	22.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	17.8%	8.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	26.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	59.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	99.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	38.4%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	10.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2023																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	22.6%	0.2%	0.0%	0.0%	0.0%	29.92%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	4.49%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.90%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.91%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.00%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	1.59%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.13%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.13%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.06%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.06%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	23.7%	13.1%	0.0%	0.0%	0.0%	0.39%
21	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	34.9%	22.8%	0.0%	0.0%	0.0%	0.14%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.8%	8.0%	0.0%	0.0%	0.0%	0.26%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									26.7%	0.0%	0.0%	0.0%	0.0%	25.04%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									59.5%	0.0%	0.0%	0.0%	0.0%	10.09%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									99.8%	0.0%	0.0%	0.0%	0.0%	0.28%
27	of which motor vehicle loans													38.4%	0.0%	0.0%	0.0%	0.0%	1.00%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.02%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	10.3%	0.0%	0.0%	0.0%	0.0%	64.83%

4. GAR KPI Flow – Turnover-based data:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	19.7%	0.2%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	6.8%	3.5%	0.0%	0.4%	2.6%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
21	Loans and advances	6.7%	3.5%	0.0%	0.4%	2.6%	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	24.1%	0.0%	0.0%	0.0%	0.0%	24.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	23.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	65.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	99.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	30.1%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	13.0%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																	Proportion of total assets covered
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	19.78%	0.20%	0.00%	0.02%	0.15%	38.59%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.13%	0.01%	0.01%	0.00%	0.00%	4.16%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.07%	0.01%	0.01%	0.00%	0.00%	3.43%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.08%	0.01%	0.01%	0.00%	0.00%	2.83%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%	0.00%	0.00%	0.00%	0.00%	0.60%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.40%	0.03%	0.00%	0.02%	0.01%	0.73%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%	8.05%	3.53%	0.00%	0.35%	2.60%	2.21%
21	Loans and advances	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%	8.05%	3.55%	0.00%	0.36%	2.61%	2.19%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	48.26%	0.00%	0.00%	0.00%	0.00%	0.01%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									23.12%	0.00%	0.00%	0.00%	0.00%	32.22%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									65.10%	0.00%	0.00%	0.00%	0.00%	9.72%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									99.48%	0.00%	0.00%	0.00%	0.00%	0.17%
27	of which motor vehicle loans													30.12%	0.00%	0.00%	0.00%	0.00%	3.18%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	13.04%	0.13%	0.00%	0.01%	0.10%	58.52%

4. GAR KPI Flow – CapEx-based:

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
				of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
	GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	20.2%	0.7%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	**Financial undertakings**	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
7	Other financial corporations	0.4%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
20	**Non-financial undertakings**	15.3%	11.8%	0.0%	8.8%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	Loans and advances	15.2%	11.8%	0.0%	8.9%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Debt securities, including UoP	23.0%	16.3%	0.0%	0.0%	0.0%	6.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%
24	**Households**	23.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
25	of which loans collateralised by residential immovable property	65.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
26	of which building renovation loans	99.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%				
27	of which motor vehicle loans	30.1%	0.0%	0.0%	0.0%	0.0%								
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**Total GAR assets**	13.3%	0.4%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

	% (compared to total covered assets in the denominator)	Disclosure reference date 31 December 2024																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
				of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling	
	GAR – Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.2%	0.7%	0.0%	0.5%	0.0%	38.59%
2	**Financial undertakings**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	4.16%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	3.43%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	2.83%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.60%
6	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.1%	0.0%	0.0%	0.0%	0.73%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.01%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.01%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
11	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
15	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.01%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.01%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
19	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
20	**Non-financial undertakings**	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	15.6%	11.8%	0.0%	8.8%	0.8%	2.21%
21	Loans and advances	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	15.6%	11.8%	0.0%	8.9%	0.8%	2.19%
22	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	29.8%	16.3%	0.0%	0.0%	0.0%	0.01%
23	Equity instruments	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.0%		0.0%	0.0%	0.00%
24	**Households**	0.0%	0.0%	0.0%	0.0%									23.1%	0.0%	0.0%	0.0%	0.0%	32.22%
25	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%									65.1%	0.0%	0.0%	0.0%	0.0%	9.72%
26	of which building renovation loans	0.0%	0.0%	0.0%	0.0%									99.5%	0.0%	0.0%	0.0%	0.0%	0.17%
27	of which motor vehicle loans													30.1%	0.0%	0.0%	0.0%	0.0%	3.18%
28	**Local governments financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
29	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
30	Other local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%
32	**Total GAR assets**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	13.3%	0.4%	0.0%	0.3%	0.0%	58.52%

5. KPI off-balance sheet exposures (Stock) – Turnover-based data:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
			of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
1 Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2 Assets under management (AuM KPI)	1.8%	0.3%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
1 Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2 Assets under management (AuM KPI)	0.2%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.2%	0.4%	0.0%	0.0%	0.3%

5. KPI off-balance sheet exposures (Stock) – CapEx-based:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
			of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
1 Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2 Assets under management (AuM KPI)	2.4%	0.6%	0.0%	0.1%	0.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
1 Financial guarantees (FinGuar KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2 Assets under management (AuM KPI)	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.7%	0.7%	0.0%	0.1%	0.6%

5. KPI off-balance sheet exposures (Flow) – Turnover-based data:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
			of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

5. KPI off-balance sheet exposures (Flow) – CapEx-based:

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)		
			of which use of proceeds	of which transitional	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
	of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which enabling			of which use of proceeds	of which transitional	of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation – DSK:

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI*	KPI**	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Main KPI	**Green asset ratio (GAR) stock**	**0.00**	**0.00**	**0.00%**	**0.00%**	**70.82%**	**27.90%**	**29.18%**

* Based on the Turnover KPI of the counterparty.
** Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used.
*** % of assets covered by the KPI over banks' total assets.

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	0.00	0.00	0.00%	0.00%	47.48%	7.26%	52.52%
	Financials guarantees	0.00	0.00	0.00%	0.00%			
	Asset under management	14.61	35.97	0.02%	0.05%			

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation – OBH:

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI*	KPI**	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Main KPI	**Green asset ratio (GAR) stock**	**311.75**	**787.60**	**0.01%**	**0.03%**	**73.48%**	**20.94%**	**26.52%**

* Based on the Turnover KPI of the counterparty.
** Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used.
*** % of assets covered by the KPI over banks' total assets.

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	276.50	678.12	0.04%	0.09%	54.02%	14.57%	45.98%
	Financials guarantees	0.00	0.00	0.00%	0.00%			
	Asset under management	27.91	78.57	0.04%	0.10%			

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation – OBS:

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI*	KPI**	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Main KPI	**Green asset ratio (GAR) stock**	**7,210.51**	**14,451.81**	**0.19%**	**0.38%**	**62.55%**	**22.65%**	**37.45%**

* Based on the Turnover KPI of the counterparty.
** Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used.
*** % of assets covered by the KPI over banks' total assets.

		Total environmentally sustainable assets, (million HUF) [turnover-based]	Total environmentally sustainable assets, (million HUF) [CapEx-based]	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7[2] and [3] and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7[1] and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	1,570.04	1,447.26	0.17%	0.15%	46.67%	16.42%	53.33%
	Financials guarantees	0.00	0.00	0.00%	0.00%			
	Asset under management	0.00	0.00	0.00%	0.00%			

Notes:
- Across the reporting templates: cells shaded in grey should not be reported.
- Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026.

The separate report published by the OTP Fund Manager and the tables indicated in Annex XII of Regulation 2021/2178 are presented under a separate sub-heading.

General qualitative information on the content and methodology of KPIs published in Annex XI of Regulation No. 2021/2178:
The scope of assets and activities covered by the KPIs:

Asset portfolio covered
The calculation of the green asset ratio (GAR) for on-balance sheet exposures shall cover the following accounting categories of financial assets, including loans and advances, debt securities, equity holdings and repossessed collaterals:

- financial assets at amortised cost;
- financial assets at fair value through other comprehensive income;
- investments in subsidiaries;
- joint ventures and associates;
- financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss;
- real estate collaterals obtained by credit institutions by taking possession in exchange for the cancellation of debts.

The ESG strategy's key element of OTP Group is to increase the green loan portfolio. The alignment of green lending with the EU Taxonomy is ensured through the Group's green frameworks. The presentation of the frameworks can be found in the @Voluntary GAR reporting.

In accordance with Article 7(1) of Regulation No. 2021/2178, exposures to central governments, central banks and supranational issuers shall be excluded from the calculation of the numerator and denominator of key performance indicators of financial undertakings.

Pursuant to Article 7 of Regulation No. 2021/2178, the following assets are excluded from the numerator of the GAR:

- financial assets held for trading;
- on-demand interbank loans;
- (c) exposures to undertakings that are not obliged to publish non-financial information pursuant to Article 19a or 29a of Directive No. 2013/34/EU;
- derivatives;
- cash and cash-related assets;
- other categories of assets (e.g. goodwill, goods etc.).

Based on the guidance in Annex III of EU Regulation No. 2021/2178, gross exposures have been aggregated in the relevant row of Template 1 of the GAR for credit institutions based on the separate report of OTP Fund Management. Exposures on assets under management are shown on a consolidated basis in the asset GAR indicator in summary template 0, based on data on the total assets of the Fund Manager.

Financial data are identified based on the Bank's analytical credit and risk database and FINREP balance sheet data. In respect of alignment with the taxonomy, data were generated through individual data requests or from publicly available data.

Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '0'

The use of CAPEX and turnover-based reporting has necessitated the duplication of KPI cells.

The definition of the KPIs shall be based on the following components:

a) the numerator, which shall cover the loans and advances, debt securities, equities and repossessed collaterals, financing Taxonomy-aligned economic activities based on turnover KPI and CapEx KPI of underlying assets.

b) the denominator, which shall cover the total loans and advances, total debt securities, total equities and total repossessed collaterals and all other covered on-balance sheet assets.

Pursuant to point 1.2.3. (Fees and commissions) of Annex V, KPIs for trading book items and fees and commissions are applicable from 1 January 2026.

Findings concerning Annex VI of Regulation No. 2021/2178, Template 1

The template has been duplicated on the basis of counterparty turnover and CapEx data.

The numerators of the two GAR KPIs differ for (general) loans for unknown purpose, bond exposure and equity holdings to non-financial undertakings.

Exposures were analysed along the following customer segmentation:

- financial undertakings
- non-financial undertakings
- retail customers (with the following sub-categories: residential property, home renovation and car loans)
- local governments (only with the following sub-category: housing financing) – rental housing financing or known green loan purpose
- collateral obtained by taking possession, residential and commercial real estate

Tables T-1 are filled in using the latest version of the data as at 31.12.2023, where available.

Information on financial undertakings

The collection of data on the taxonomy reports of financial enterprises was carried out taking into account the latest available data. Pursuant to the financial materiality threshold, exposures that did not reach 0.01% of the portfolio's size in terms of taxonomy evaluation were not taken into account. When collecting and processing the taxonomy reports, the Bank made all reasonable efforts in order to ensure portfolio coverage is as comprehensively as possible.

Information on non-financial undertakings

The range of customers covered by the NFRD has been identified for each subsidiary bank, taking into account local regulations.

Filtering criteria (Hungary):

	Based on Accounting Act C./2000: in the two consecutive business years preceding the business year, on the balance sheet date, any two of the following three indicators exceeded the following limit:
Number of employees	> 250 persons
Total assets	> HUF 10 billion
Annual net sales revenue	> HUF 20 billion

For the application of the above filtering criteria, data compiled by an external data provider and existing in the banking systems were used. Loans and debt securities exposures to non-financial undertakings were taken into account on the basis of known and unknown loan purposes. In the case of known loan purposes, transactions that have been designated on the basis of the Bank's eligibility and alignment checks have been taken into account. In the case of unknown loan purposes and for equity exposures, the counterparty's disclosed turnover and CAPEX eligibility and alignment information has been taken into account.
If no published information was available for the counterparty concerned, the Bank did not take into account the counterparty's exposures for the purposes of eligibility and alignment in the course of reporting.
We have made every reasonable effort to identify the NFRD-obliged companies that appear in the parent company consolidation. At the same time, in the absence of up-to-date, comprehensive data provided by a public authority or a market operator, it is conceivable that not all of our NFRD-obligated customers have been identified. The Bank's short-term plans include the full, up-to-date identification of the non-financial partners involved in the GAR report and the integration of the required data into the bank's IT systems.
Loans and advances belonging to the specialized financing segment that can be identified in the controlling system are examined for the special lending category. In the case of bond exposures, the debt securities invested in project financing exposures were examined.

Information on households

GAR for retail exposures to residential real estate or house renovation loans was calculated as a proportion of loans to households collateralised by residential immovable property or granted for house renovation purposes that is Taxonomy-aligned in accordance with the relevant technical screening criteria for buildings, in particular renovation and acquisition and ownership in accordance with Annex I and Sections 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, and 7.7 respectively of Annex II to Delegated Regulation (EU) No. 2021/2139 or Sections 3.1 and 3.2 of Annex II to Delegated Regulation (EU) No. 2023/2486, compared to total loans to households collateralised by residential immovable property or granted for house renovation purposes.
According to the Bank's interpretation, based on EU Regulation 2021/2178, gross exposure to households means the Bank's exposure to all households, not just loans secured by residential real estate. The taxonomic examination can be interpreted in the case of exposures secured by residential real estate, loans secured by non-residential real estate are excluded during the taxonomic examination.
In line with the spirit of the legal interpretation, in order to avoid duplication of exposures,

the Bank has decided to show exposures related to building modernization as defined in Section 7.2 of Annex I of the Delegated Act only in row 28 of Template and to exclude these exposures from loans collateralized by residential immovable property.
GAR for consumer credit exposures for car loans shall be calculated as the proportion of loans financing cars complying with the technical screening criteria as laid down in Section 6.5 of Annex I to Climate Delegated Act. This GAR includes disclosures related to transition activities, as well as the disclosure of loan portfolios for loans granted only after the start date of the application of Regulation EU 2021/2178, as well as the publication of flow of loans. Given that the Bank is currently unable to verify DNSH compliance in the case of residential exposures, the Bank does not display data related to taxonomy-aligned residential real estate financing for 2024.
The value for special lending in this residential exposure category is the same as the taxonomy-aligned value.
The Bank was unable to identify any exposure to rental housing financing beyond any doubt, so the fields in this category do not contain any data. Based on the interpretation of the legislation, exposures related to other non-rental housing or known green loan purposes must be excluded from the numerator of the GAR.
For the given exposure class, the methodology used shall contain the gross carrying amount of commercial and residential repossessed real estate collaterals compliant with the technical screening criteria for buildings in Section 7.7 of Annex I to Delegated Act. The denominator contains the total gross book value of the commercial and residential real estate collateral seized by the credit institution.

Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '2'

The Bank's interpretation is that column (a) of the template should contain – in a breakdown by 4-digit NACE code – the core activities of all the Bank's counterparties that fall within the scope of the NFRD.
The table contains exposures that are eligible and aligned to EU Taxonomy, per the given NACE code.

Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '3'

In this template, the Bank has disclosed the GAR KPI for the loan portfolio, which have been calculated for the covered assets on the basis of the data reported in template 1, using the formulae provided in the template published by the Commission.
The Bank has duplicated this template for turnover-based and CapEx-based disclosures.

Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '4'

The Bank has duplicated this template for turnover-based and CapEx-based disclosures.
In disclosing information on changes in portfolio, the Bank has reported exposures incurred in the current year.

Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '5'

In the calculation of the KPIs for off-balance sheet exposures (financial guarantees and assets under management), the Bank has used the data on covered assets provided in Table 1 and the formulas suggested in this table. Exposures for which information was not available in the Bank's systems are not considered and disclosed in this report.

Findings and publication regarding Annex XII to 2021/2178

Pursuant to Article 8, points 6–7 of Decree 2021/2178, the Bank makes the following disclosures, which we prepared on the basis of data published by the parties concerned.
In case a value of a cell is zero, the cell will not be filled, it will remain empty.

Compared to last year, with the exception of table 3, the values show no significant, small changes. The amount and share of economic activity in the taxonomy of electricity generation from nuclear energy has fallen to a third of the previous year's level in this reporting cycle, both on a turnover and CapEx basis.

Template 1: Nuclear and fossil gas related activities:

Row	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes
	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator):

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) – Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) – CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.23	0.00%	0.23				0.01	0.00%	0.01			
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.23	0.00%	0.23				0.43	0.00%	0.43			
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,752.38	0.01%	2,752.38				5,914.98	0.02%	5,914.98			
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							243.24	0.00%	243.24			
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3.88	0.00%	1.60		2.28		2.26	0.00%	2.26			
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	29,044,873.54	99.99%					29,041,469.33	99.98%				
8	**Total applicable KPI**	29,047,630.26	100%					29,047,630.26	100%				

Template 3 – Taxonomy-aligned economic activities (numerator):

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) – Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) – CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00				0.10	0.00%	0.10			
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.00	0.00%	0.00									
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2,451.47	8.07%	2,451.47				5,791.00	7.28%	5,791.00			
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							0.06	0.00%	0.06			
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.43	0.00%	0.43		0.00		0.07	0.00%	0.07			
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							1.16	0.00%	1.16			
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	27,911.41	91.92%					74,626.96	92.80%				
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	30,363.31	100,00%					80,419.34	100,00%				

Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities:

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) – Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) – CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.05	0.00%	0.05				0.02	0.00%	0.02			
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7.38	0.00%	7.38									
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	131.99	0.00%	131.99				15.31	0.00%	15.31			
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	14.14	0.00%	14.14				299.37	0.01%	299.37			
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	304.35	0.01%	304.35		0.00		231.15	0.01%	231.15			
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.58	0.00%	1.58									
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	3,920,169.56	99.99%					3,922,120.35	99.99%				
8	**Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the numerator of the applicable KPI**	3,920,629.05	100.00%					3,922,666.19	100.00%				

Template 5 – Taxonomy non-eligible economic activities:

Row	Economic activities	Turnover		CapEx	
		Amount	%	Amount	%
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,289.39	0.01%		
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	8.94	0.00%	22.95	0.00%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4.75	0.00%		
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,925.52	0.01%	706.89	0.00%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.14	0.00%	1.15	0.00%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	25,092,408.15	99.98%	25,043,813.73	100.00%
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	25,096,637.90	100.00%	25,044,544.72	100.00%

The data on nuclear energy and fossil gas activities published in the 2023 Financial Report are published below:

Template 1: Nuclear and fossil gas related activities (T–1):

Row	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes
	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator; T–1):

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) – Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) – CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4,241.3	0.02%	4,241.3				5,831.8	0.02%	5,831.8			
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	25,851,399	99.98%					25,849,808	99.98%				
8	**Total applicable KPI**	25,855,640	100%					25,855,640	100%				

Template 3 – Taxonomy-aligned economic activities (numerator; T–1):

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) – Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) – CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI												
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI												
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	3,997.4	32%	3,997.4				5,916.6	25%	5,916.6			
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI												
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI												
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI												
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	8,454	68%					17,564	75%				
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	12,451	100%					23,481	100%				

Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities (T–1):

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) – Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) – CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	10.6	0%	10.6									
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							171.4	0.01%	171.4			
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	507.2	0.02%	507.2				402.3	0,01%	402.3			
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							16.4	0%	16.4			
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	3,374,915	99.98%					3,389,945	99.98%				
8	**Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the numerator of the applicable KPI**	3,375,433	100%					3,390,535	100%				

Template 5 – Taxonomy non-eligible economic activities (T-1):

Row	Economic activities	Turnover Amount	Turnover %	CapEx Amount	CapEx %
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,708.3	0.01%	1,371.6	0.01%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	22,478,499	99.99%	22,463,733	99.99%
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	22,480,207	100%	22,465,105	100%

According to the third Commission Notice (C/2024/6691 Commission Notice) Annex XII templates should be published on a flow basis. However due to the publishing date of the notice – November 2024 – OTP Group does not prepare Annex XII templates on a flow basis in the current reporting period.

Independent report published by the OTP Fund Manager

The following is the mandatory report for the OTP Fund Manager. The report for 2024 includes the data of the Fund Manager's subsidiaries[35] as well, while the report for 2023 includes the exposures of OTP Fund Manager as a separate legal entity, which limits the comparability of the results for the two years.

Reference date: 31 December 2024

	in HUF million
The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:	The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with following weights for investments in undertakings per below:
Turnover-based: **0.80%**	Turnover-based: **22,290**
CapEx-based: **1.66%**	CapEx-based: **45,959**
The percentage of assets covered by the KPI relative to total investments (total AuM). Excluding investments in sovereign entities.	The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.
Coverage ratio: **63.87%**	Coverage: **2,776,316**

[35] DSK Asset Management EAD, LLC AMC OTP Capital, OTP Alapkezelő Ltd., OTP INVEST DRUŠTVO ZA UPRAVLJANJE UCITS I ALTERNATIVNIM FONDOVIMA AD BEOGRAD, OTP Invest d.o.o.

Additional, complementary disclosures: breakdown of denominator of the KPI	in HUF million
The percentage of derivatives relative to total assets covered by the KPI. –	The value in monetary amounts of derivatives: –
A 2013/34/EU irányelv 19a. és 29a. cikkének hatálya alá nem tartozó uniós pénzügyi és nem pénzügyi vállalkozásokkal szembeni kitettségek aránya a KPI által lefedett összes eszközön belül:	A 2013/34/EU irányelv 19a, és 29a, cikkének hatálya alá nem tartozó uniós pénzügyi és nem pénzügyi vállalkozásokkal szembeni kitettségek értéke:
For non-financial undertakings: **1.39%**	For non-financial undertakings: **38,685**
For financial undertakings: **4.95%**	For financial undertakings: **137,523**
The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: **39.90%**	For non-financial undertakings: **1,107,738**
For financial undertakings: **24.89%**	For financial undertakings: **691,142**
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: **7.24%**	For non-financial undertakings: **201,019**
For financial undertakings: **11.19%**	For financial undertakings: **310,588**
The proportion of exposures to other counterparties and assets over total assets covered by the KPI: **10.43%**	Value of exposures to other counterparties and assets: **289,622**
The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI: ***87.53%***	The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI: ***2,430,102***
The value of all the investments that are funding taxonomy-eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI: ***7.62%***	Value of all the investments that are funding Taxonomy-eligible economic activities, but not taxonomy-aligned: ***211,491***
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings:	For non-financial undertakings:
Turnover-based: **0.68%**	Turnover-based: **18,755**
Capital expenditures-based: **1.47%**	Capital expenditures-based: **40,872**
For financial undertakings:	For financial undertakings:
Turnover-based: **0.00%**	Turnover-based: **1**
Capital expenditures-based: **0.00%**	Capital expenditures-based: **9**
The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:	Value of Taxonomy-aligned exposures to other counterparties and assets:
Turnover-based: **0.13%**	Turnover-based: **3,526**
Capital expenditures-based: **0.18%**	Capital expenditures-based: **5,079**

Breakdown of the numerator of the KPI per environmental objective:

Taxonomy-aligned activities:				
1. Climate change mitigation				
Transitional activities:	Turnover:	**0.06%**	Turnover:	**1,552**
	CapEx:	**0.19%**	CapEx:	**5,363**
Enabling activities:	Turnover:	**0.46%**	Turnover:	**12,899**
	CapEx:	**0.82%**	CapEx:	**22,635**
2. Climate change adaptation				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**5**
	CapEx:	**0.00%**	CapEx:	**3**
Enabling activities:	Turnover:	**0.05%**	Turnover:	**1,262**
	CapEx:	**0.05%**	CapEx:	**1,331**
3. The sustainable use and protection of water and marine resources				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**11**
	CapEx:	**0.00%**	CapEx:	**26**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**26**
	CapEx:	**0.01%**	CapEx:	**142**
4. The transition to a circular economy				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**112**
	CapEx:	**0.00%**	CapEx:	**27**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**73**
	CapEx:	**0.00%**	CapEx:	**24**
5. Pollution prevention and control				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**21**
	CapEx:	**0.00%**	CapEx:	**1**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**1**
	CapEx:	**0.00%**	CapEx:	**1**
6. The protection and restoration of biodiversity and ecosystems				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**2**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**

OTP Fund Management publishes the following report for the financial year 2023:

	in HUF million
The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:	The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with following weights for investments in undertakings per below:
Turnover-based: **0.54%**	Turnover-based: **14,222**
CapEx-based: **1.05%**	CapEx-based: **27,842**
The percentage of assets covered by the KPI relative to total investments (total AuM). Excluding investments in sovereign entities.	The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.
Coverage ratio: **83.22%**	Coverage: **2,644,791**
Additional, complementary disclosures: breakdown of denominator of the KPI	
The percentage of derivatives relative to total assets covered by the KPI: –	The value in monetary amounts of derivatives: –
The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: **0.72%**	For non-financial undertakings: **19,087**
For financial undertakings: **3.06%**	For financial undertakings: **81,042**
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: **35.43%**	For non-financial undertakings: **937,141**
For financial undertakings: **44.25%**	For financial undertakings: **1,170,413**
The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:
For non-financial undertakings: **6.29%**	For non-financial undertakings: **166,292**
For financial undertakings: **7.40%**	For financial undertakings: **195,762**
The proportion of exposures to other counterparties and assets over total assets covered by the KPI: **2.84%**	Value of exposures to other counterparties and assets: **75,053**
The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI: ***79.69%***	The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI: **2,107,555**
The value of all the investments that are funding taxonomy-eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI: ***14.73%***	Value of all the investments that are funding Taxonomy-eligible economic activities, but not taxonomy-aligned: **389,520**
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings:	For non-financial undertakings:
Turnover-based: **0.50%**	Turnover-based: **13,283**
Capital expenditures-based: **1.01%**	Capital expenditures-based: **26,679**
For financial undertakings:	For financial undertakings:
Turnover-based: **0.00%**	Turnover-based: **0**
Capital expenditures-based: **0.00%**	Capital expenditures-based: **0**
The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:	Value of Taxonomy-aligned exposures to other counterparties and assets:
Turnover-based: **0.04%**	Turnover-based: **938**
Capital expenditures-based: **0.04%**	Capital expenditures-based: **1,163**

Breakdown of the numerator of the KPI per environmental objective:

Taxonomy-aligned activities:				
1. Climate change mitigation				
Transitional activities:	Turnover:	**0.04%**	Turnover:	**1,038**
	CapEx:	**0.15%**	CapEx:	**3,988**
Enabling activities:	Turnover:	**0.35%**	Turnover:	**9,157**
	CapEx:	**0.58%**	CapEx:	**15,279**
2. Climate change adaptation				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**4**
	CapEx:	**0.00%**	CapEx:	**3**
Enabling activities:	Turnover:	**0.04%**	Turnover:	**1,175**
	CapEx:	**0.07%**	CapEx:	**1,742**
3. The sustainable use and protection of water and marine resources				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**
4. The transition to a circular economy				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**
5. Pollution prevention and control				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**
6. The protection and restoration of biodiversity and ecosystems				
Transitional activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**2**
Enabling activities:	Turnover:	**0.00%**	Turnover:	**0**
	CapEx:	**0.00%**	CapEx:	**0**

Contextual information in support of the quantitative indicators including the scope of assets and activities covered by the KPIs, information on data sources and limitation.

The KPI covers equity and bond assets within the funds and portfolios managed by Fund Manager and its subsidiaries. Collective investment forms representing a significant portion of each portfolio were considered only if the ESG service provider used by Fund Manager (MSCI ESG Research) can break down underlying investments, excluding state securities. The coverage is further limited as the data reporting obligations under Articles 19a and 29a of Directive 2013/34/EU only extend to a limited group of target companies receiving Fund Manager's investments, so for a significant portion of investments, the Fund Manager and the ESG service provider do not have usable data. 63.87% of the 11 billion EUR assets managed by the Fund Manager and its subsidiaries were considered. In terms of the evolution of the GAR ratio over time, the calculated GAR ratio increased from 0.54% to 0.8% on a turnover basis and from 1.05% to 1.66% on a CapEx basis. For each activity, only activities related to mitigating climate change and adapting to climate change were fully considered in this reporting period. Activities related to sustainable use and protection of water and marine resources, transition to circular economy, and pollution prevention and reduction were only provided by non-financial companies.

Fund Manager relied solely on data provided by the ESG service provider (MSCI ESG Research) when calculating the KPIs and did not use any other external ESG providers or conduct its own data collection.

Due to the data provision of MSCI ESG Research, the breakdown taxonomy aligned activities of OTP Fund Manager is only possible according to transitional and enabling activities, in the Annex VI templates of OTP Group. OTP Fund Manager's monetary amount of taxonomy aligned activities dislosed according to Annex IV also consist of those taxonomy aligned activities which have not received a transitional or enabling flag, hence the two values are different.

An explanation of the nature and purpose of the economic activities aligned with the Taxonomy and an explanation of the evolution of the economic activities aligned with

The taxonomy over time from the second year of implementation, distinguishing between business-related and methodological and data-related elements.

Explanation of the nature and objectives of the economic activities aligned with the taxonomy, and the explanation of the evolution of these activities over time starting from the second year of implementation, distinguishing between business-related, methodological, and data-related elements.

OTP Fund Management does not have a general, overarching goal for economic activities aligned with the taxonomy but considers the environmental objectives of sustainability when evaluating a given investment, focusing primarily on greenhouse gas emissions, waste and pollutant emissions, and water stress.

In calculating the eligibility and alignment KPIs according to the EU taxonomy for the managed assets, the OTP Group is making a restatement regarding the data for the 2023 financial year. Therefore, the consolidated sustainability data for 2023 published in this report are not comparable to the data published in last year's report.

The OTP Climate Change Fund

The OTP Climate Change Fund integrates sustainability considerations into investment decision-making as follows:

The Fund's reference index is aligned with its investment strategy (70% MSCI ACWI IMI SDG 7 Affordable and Clean Energy Select Index + 25% MSCI EMU Climate Change ESG Select NETR EUR + 5% RMAX). The two MSCI indices in the reference index are ESG-focused. Using an ESG-type benchmark supports achieving the ESG goals outlined in the investment policy by overweighting companies with high ESG scores compared to those with low ESG scores, following a methodology equivalent to the Fund's investment policy.

The MSCI ACWI IMI SDG 7 Affordable and Clean Energy Select Index aims to support SDG 7 goals (affordable, sustainable, and clean energy for all), one of the 17 sustainability goals adopted in the UN's 2030 Agenda.
The MSCI EMU Climate Change ESG Select Index aims to consider sustainability aspects in its composition and adjusts company capitalization based on low emissions and positive contributions to climate change.
During the investment strategy, we filter securities in the reference indices to create a shortlist of interesting investment targets for the Fund. Companies in the reference indices are already ESG-screened, and companies with more than 5% of their revenue from arms manufacturing or tobacco sales cannot be included.
The shortlist may include securities not in the reference index but are seen as contributing to sustainable development or having good ESG ratings within their industry. Companies without ESG ratings but contributing to sustainability goals or leading their industry in sustainability may also be included with limited weight.
Companies with more than 5% of their revenue from arms manufacturing or tobacco sales cannot be included in the shortlist. The Fund also does not invest in companies with more than 50% of their revenue from coal, natural gas, or oil extraction.
The final portfolio must consist of at least 70% of shares that, in addition to contributing to the preservation of the planet, have good, sustainable ratings in the ESG approach. Good, sustainable ratings are defined as MSCI ratings between AAA–BBB for developed market shares and AAA–BB for emerging market shares.
The Fund's primary goal is to mitigate climate change and promote adaptation to climate change. The Fund aims to achieve this goal in line with Article 16 of the Taxonomy Regulation by investing in companies whose activities, primarily through their products, directly contribute to other companies' significant contributions to combating climate change.
The Fund does not have a sustainability objective but commits to investing at least 51% in sustainable investments, including 10% in environmentally sustainable investments aligned with the taxonomy.

OTP Omega Fund of Funds

The Fund invests in other actively and passively managed funds in accordance with the fund of funds structure. The research advisor (MSCI) publishes an ESG rating for some funds, but not for others. This depends partly on the business considerations of the ESG consultant, but also partly on the business considerations of the individual fund managers themselves. The Fund does not have a sustainability objective but commits to investing at least 51% of its investments in sustainable programs, within which it will not invest in taxonomy-aligned environmentally sustainable investments.

OTP Ecotrend Fund

The Fund seeks to make a commitment to promoting environmental features, primarily through its bond portfolio. The Fund plans to invest partly in green government bonds to finance or refinance expenditures that promote the transition to a low-carbon, climate resilient and environmentally sustainable economy. Thus, it falls into one of the six green sectors: renewable energy, energy efficiency, waste and water management, land use and use of living natural resources, clean transport, and adaptation. The Fund does not have a sustainability objective, nor does it have a commitment to a minimum ratio of sustainable investments.

The KPI data calculated by the Fund Manager for the year 2024 and its breakdown compared to the year 2023 have changed due to the portfolio compositions, coverage, and the expansion of available data. The Fund Manager did not examine the individual effects of the change factors, and a trend regarding the change cannot be determined from data of two years alone.

Description of the compliance with Regulation (EU) No. 2020/852 in the financial undertaking's business strategy, product design processes and engagement with clients and counter-parties.

OTP Fund Management is committed to taking sustainability risks into account in its investment decisions and to continuously increasing the number of SFDR-rated products that invest in a significant share of sustainable investments. For funds and portfolios that have a commitment to sustainable investment under the Taxonomy Regulation, the EU taxonomy DNSH indicators are considered in addition to the sustainability indicator calculated by the ESG data provider selected by the Fund Manager to determine Taxonomy compliance, in accordance with the commitment of the fund/portfolio concerned.

The Fund Management currently has one Fund (OTP Climate Change Fund) or which the Fund Manager has committed that at least 10% of the investments will be aligned with the EU Taxonomy. (This ratio was approximately 30% in the fund at the end of 2024).

2.1.1 Voluntary Reporting

OTP Group wishes to present its sustainability efforts in the most transparent way possible. For this reason, it takes the opportunity to present its green portfolio, its composition, the calculation methodology used and the underlying definitions in the voluntary green portfolio report.

In addition to reporting the mandatory green asset ratio set by the Taxonomy Regulation, the Bank discloses the total composition of its green portfolio, as defined by the Bank, and the relevant ratios based on other market and regulatory standards beyond the Taxonomy regulation.

One of the key objectives of OTP Group's ESG strategy is the continuous expansion of its green portfolio. The Group actively finances the region's green transition and has introduced a green asset KPI at the subsidiary level in line with local ESG strategies to monitor and promote this goal. By the end of 2024, the green portfolio reached HUF 1,027 billion, marking a 56% increase compared to the previous year's green portfolio.[36]

Further detailing of objectives continued, and OTP Bank Management Committee approved specific targets for 2025, segmented into retail and corporate categories. The Group has committed to achieving HUF 1,500 billion in green loan portfolio volume by 2025 through dynamic expansion across all key customer segments.

The corporate green portfolio grew by 64% compared to the previous year, with sustainable corporate assets representing over 80% of the total sustainable portfolio. The proportion of sustainable exposures relative to gross book value reached 2,3%, reflecting an improvement of more than 50% from the previous year.

The corporate green bond portfolio grew by 35% year-over-year, maintaining a consolidated gross book value ratio of 40%, while its share within the sustainable portfolio exceeded 5%.

The majority of the retail green portfolio is linked to Hungarian entities. The portfolio's green share increased by more than 13% compared to the previous year, a trend expected to continue as data quality improves. The retail segment's share within the total sustainable portfolio approached 19%.

OTP Group as green loan portfolios in nine countries: Hungary, Bulgaria, Slovenia, Croatia, Serbia, Uzbekistan, Montenegro, Albania and Moldova. Green financing is ongoing.

OTP Group integrates green/climate-conscious[37] lending into its business activities and aims to ensure that over time, any customer in any sector can receive a loan under green conditions if the customer has a green/sustainable goal they wish to achieve with the loan.

The maturity of this process varies by country, industry, and customer segment.

The expected impact of green lending on reducing GHG emissions is presented in the @E1-4 disclosure requirement, but this has not been measured so far.

[36] Increasing the green portfolio is one of the main action packages related to the three climate change subtopics according to the ESRS.

[37] The Group does not specifically address the sub-topics set out in the ESRS.

OTP Group's Green Portfolio

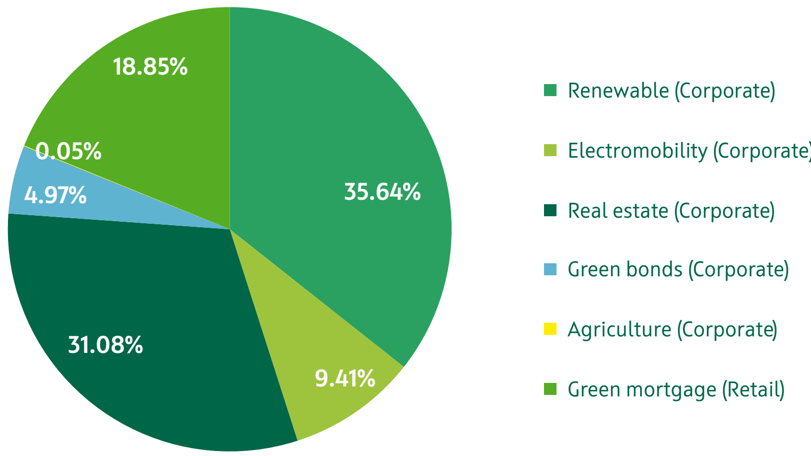
OTP Group's sustainable frameworks are defined by the Green Lending Framework, the Sustainable Finance Framework, the MNB's green housing, as well as green corporate and municipal capital requirement discount programs, and the EU Taxonomy. OTP Group considers exposures that meet the criteria defined in these frameworks as green exposures, records them as green loans in its internal databases, and sets quantitative targets for these exposures. Hereinafter, we refer to this as the OTP Group's green portfolio.

To demonstrate the correlations with the mandatory GAR report figures, the table below presents the OTP Group's green portfolio in proportion to the total balance sheet total and the GAR asset total data defined in the mandatory report under the Taxonomy Regulation.
The table takes into account the exposures determined by the OTP Group that meet the sustainable criteria detailed below and are recorded as green. The figures include green loan and bond exposures of enterprises outside the EU, as well as exposures of clients who are not subject to the NFRD/CSRD during the reporting period, i.e., those that cannot be included in the mandatory GAR report.

		Green Portfolio as defined by OTP Group			
	Gross book value*	Green portfolio	Green portfolio as a proportion of gross exposure by customer segment	Green portfolio as a proportion of Total assets	Green portfolio as a proportion of Total GAR assets
	HUF million	HUF million	%	%	%
Total assets	**44,852,131**				
Total GAR assets	**29,047,630**				
Non-financial corporations	10,597,072	833,809	7.87%	1.86%	2.87%
Loans and advances	10,187,983	782,721	7.68%	1.75%	2.69%
Debt securities	339,126	51,088	15.06%	0.11%	0.18%
Other	69,964				0.00%
Households	13,692,065	193,634	1.41%	0.43%	0.67%
Green portfolio of OTP Group**		**1,027,443,09**		**2.29%**	**3.54%**

* According to Gross Book Value of EU Taxonomy.
** As defined in 2.3.

Distribution of OTP Group's green portfolio based on loan purpose



This allocation demonstrates the portfolio's diversification and balance across various green investment areas. Renewable energy and corporate real estate projects represent a significant portion of the green portfolio, with electromobility and residential mortgage loans also significant. Although agriculture and corporate green bonds account for smaller portions, they contribute to the portfolio's year-over-year growth.

OTP Group's Green Loan and Sustainable Finance Frameworks

The Group has developed its green loan and sustainable finance frameworks by taking into account internation best practices.
The @Green Loan Framework, endorsed by external experts (SPOs), was updated and approved in July 2023 by the Hungarian National Bank. This ensures that loans meeting the conditions of the framework are eligible for the MNB's Green Corporate and Municipal Capital Relief Program Category B, which defines the scope of "eligible transactions under the framework".
Throughout 2024, various IT and controlling developments were implemented. However, further significant improvements are required in the data infrastructure for sustainable exposures to ensure efficient group-wide tracking and the utilization of non-financial data for classification.

OTP Group identifies corporate exposures as part of its green portfolio based on loan purpose and individual transaction assessments, shaped to be in line with EU Taxonomy and MNB's green capital relief program, where applicable. Taxonomy-aligned exposures are classified according to the EU Taxonomy's technical screening criteria (TSC).
Similarly, retail exposures in OTP Group's sustainable green portfolio are assessed based on their loan purpose and compliance with one or more green criteria defined in frameworks aligned with the EU Taxonomy. The Group did not assess compliance with DNSH (Do No Significant Harm) and MSS (Minimum Social Safeguards) criteria.

Green Loan Framework

The Green Loan Framework defines the general principles of green lending and has been extended beyond Hungary to the following countries: Bulgaria, Slovenia, Croatia, Serbia, Albania, and Montenegro.
As part of the 2023 expansion to subsidiaries, the framework was broadened to include green loan purposes most relevant to OTP Group's portfolio and the climate mitigation and adaptation priorities of the specific countries.
The framework covers the following sectors named in the EU Taxonomy and the CBI (Climate Bond Initiative) Taxonomy:

- EU Taxonomy: energy, manufacturing, transportation, construction & real estate, forestry, waste management

- CBI Taxonomy: energy, industry, transportation, buildings, land use and marine sources, waste and pollution control

The framework also allows for water management-related financing.[38]
Scope of the framework applies to non-retail customers, including multinational corporations, SMEs, municipalities, and residential housing associations. The Green Alignment Assessment Tool (GAAT) is used to evaluate loan eligibility, with country-specific conditions and supporting documents.
Compliance with EU Taxonomy includes the verification of minimum safeguards (MS), where applicable.

Sustainable Finance Framework
OTP Group's funding activities continued to be supported in 2024 by the @Sustainable Finance Framework, covering both environmental and social sustainability areas.
This framework was updated in 2024 with external expert[39] validation and is available on OTP Group's @website.

Under this framework, OTP Bank and its subsidiaries can issue green and social financial instruments, including bonds (sustainable financial instruments), in compliance with: ICMA[40] Green Bond Principles, 2022; ICMA Social Bond Principles, 2023; LMA[41] Green Loan Principles, 2023 and the LMA Social Bond Principles.
The framework includes the following restrictions: Sustainable financial instruments cannot be used to finance fossil fuel production, nuclear energy production, weapons and defense-related activities, mining, gambling or tobacco-related activities.

Eligible green categories for financing[42]:
- green buildings
- renewable energy
- clean transportation

Eligible social categories for financing:
- Job creation and unemployment mitigation programs, particularly those addressing economic crises or social disruptions, including SME financing with positive social impact

OTP Group is committed to annual investor reporting within one year of issuing a sustainable financial instrument, continuing until all proceeds are allocated. The 2023 @Allocation report and @Impact report are available on OTP Group's website. The 2024 reports will be published in summer 2025.
OTP Mortgage Bank publishes on its @website an annual report on the allocation of proceeds from green mortgage bond issuances, ensuring transparency and alignment with Green Bond Principles and the underlying Hungarian Central Bank Green Mortgage Loan program, where applicable.

Corporate Green Lending

In 2024, OTP Group significantly expanded its green loan and bond portfolio, in line with its ESG strategy. The combined corporate green loan and bond portfolio grew from HUF 508 billion to HUF 834 billion, strengthening OTP's role in financing a fair and gradual transition to a low-carbon economy.

Within the green portfolio, the corporate loan portfolio – primarily comprising large corporate and project finance loans – continued to expand in 2024. This growth was driven by financing projects in renewable energy sources and sustainable real estate development. Additionally, financing for energy production from sustainable fuel sources (e.g. biomass and biogas power plants) increased.
The number of green SME loans more than doubled, exceeding HUF 90 billion in total volume.

[38] Drought poses a significant physical climate change risk related to the crop production activities of agricultural clients. Investments aimed at mitigating this risk involve, either partially or entirely, water supplementation activities that affect the quantitative and qualitative state of surface and/or groundwater.
[39] SPO: Second Party Opinion
[40] International Capital Market Association
[41] Loan Market Association
[42] The exact criteria are included in the framework.

In Hungary, Széchenyi Investment Loan Max+ was introduced, a state-supported green investment loan for micro, small, and medium-sized enterprises (SMEs). Within this program a special green variant, option D – based on the KAVOSZ[43] criteria – was launched, to offer preferential interest rates for green investments that align with OTP Group's definitions of green financing.
To further integrate sustainability principles into lending, OTP Group implemented internal developments, which are expected to drive additional growth in green loan volumes.
Subsidiaries continued the momentum from 2023, with a strong focus on renewable energy financing and electric vehicle financing.
The composition of renewable energy financing varies by country, depending on geographical and regulatory conditions, influencing the balance of solar, wind, and hydropower investments.

In real estate financing, meeting the conditions defined in the EU Taxonomy based on primary energy demand calculations poses a significant challenge. At the member state level, the regulatory environment related to energy-efficient buildings and the availability of official documents (energy certificates) vary, which greatly complicates the provision of EU Taxonomy-based green loans in the real estate sector.

Retail Green Lending

The green loan portfolio for retail customers reached HUF 193 billion by the end of 2024.[44]
In 2024, nearly HUF 25.68 billion was disbursed under the two green products introduced in 2023: OTP Green Mortgage Loan and the Green "Évnyerő" Mortgage Loan. Both products are designed for the purchase and construction of new homes and energy-efficient home renovations. The difference between the two products is the repayment structure.

The Hungarian **Green Home Program** (ZOP) loans, available in 2021–2022, still represent a major share of the retail green portfolio. This portfolio exceeds HUF 150 billion and is primarily used for energy-efficient new home purchases and construction.
In Croatia, the subsidiary bank's green home loan portfolio saw strong growth in the second half of 2024, reaching HUF 15 billion by year-end. The Sunny Loan product supports new home (apartment or house) construction and purchases and used home purchases and renovations if they meet energy efficiency criteria.

2.2 Climate Change

Policies
ESRS E1–2, E3-1, E4-2

Group Credit Risk Policy

Key content: As OTP Group continues to expand its international exposure, the complexity of lending processes and the range of credit products it offers have increased. This policy establishes the minimum credit risk management requirements at the Group level to ensure an efficient and structured risk management process. The primary objective of credit risk management is to enable safe business growth by maintaining the quality of the loan portfolio while staying within the Group's risk appetite. The Banking Group takes a holistic approach to environmental and climate risks as part of ESG risks, and ESG risks are integrated into the risk management framework for the main risk types. An ESG credit risk management framework has been incorporated into the Group Credit Risk Policy, which sets out the assessment methodology for assessing ESG risks for the non-retail segment and leasing transactions (see @2.4.2). The document aims to establish a framework that provides sufficient flexibility to adapt to changing market conditions. The policy is related to significant risks identified in the loan portfolio concerning

[43] KAVOSZ coordinates the state-subsidized loan.
[44] The amount shows the current exposure of green product structures disbursed in Hungary and certain subsidiaries, a significant domestic portion of which is accounted for in the MNB's green capital requirement discount program for housing purposes. The above figure does not include the green mortgage loan portfolio tied to non-green structures.

climate change mitigation, climate change adaptation, and energy transition.
Scope: This is a group-wide policy, applicable to domestic and international banking subsidiaries, in addition to financial subsidiaries, including leasing companies.
Accountable for implementation:
The policy is reviewed annually and approved by OTP Bank's Board of Directors.
Reference to third-party standards: MNB expects financial institutions under consolidated supervision to consider group-level risk management requirements, including ESG-related risks, within the general risk management requirements established by law, as outlined in the MNB Recommendation 11/2022 (VIII. 2.) on credit risk undertaking, measurement, management, and control (paragraph 11). The policy is in line with the EBA guidelines on loan origination and monitoring (EBA/GL/2020/06).

Corporate Lending Policy/Operational Lending Limits and Guidelines (OLLP)

Key content: The Corporate Lending Policy (OLLP) defines the general principles of corporate lending, including segment- and product-specific guidelines, related financing conditions and operational lending limits. This policy provides a structured approach to financial risk assessment while ensuring consistent ESG risk integration across the Group's corporate lending activities. The corporate lending policy aims to set general corporate lending guidelines and risk appetite and to define a set of tools to enforce this, including ESG risk-related content. As part of this, lending guidelines for environmental and climate risks and guidelines for the assessment of financial risks based on these risks have been included in the policy.
The lending policy also includes limits related to ESG risks. In this way, the policy is linked to the significant risks identified in the loan portfolio in the areas of climate change mitigation, climate change adaptation and energy.
Scope: This policy serves as a Group-wide lending standard, with subsidiaries required to integrate the ESG elements into their local lending policies. Exceptions: The Russian and Uzbek subsidiaries are not required to implement ESG provisions in 2025, but ESG-related guidance has been shared with them for voluntary adoption.
Accountable for implementation: The Hungarian corporate lending policy is approved by OTP Bank's Board of Directors. The subsidiaries' lending policies are approved by their respective local decision-making bodies.

Climate Change Mitigation policies in Asset Management

Key content: Certain OTP Group asset management companies have adopted climate change mitigation policies as part of their Sustainable Finance Disclosure Regulation (SFDR).[45] These commitments are outlined in the Principal Adverse Impact (PAI) Statement, which assesses the negative environmental impact of investment portfolios. These policies also comprehensively address climate change. OTP Fund Management primarily aims to reduce greenhouse gas emissions, particularly the carbon footprint, and decrease energy consumption intensity in sectors with significant climate impact by carefully selecting new investments and, if necessary, phasing out existing investments. OTP Real Estate Fund Management strives to achieve and maintain a declining trend in indicators related to GHG emissions and energy use. DSK Asset Management has formulated the general goal of mitigating impacts.
Scope: OTP Asset Management, DSK Asset Management, and investment portfolio of OTP Real Estate Investment Fund Management.
Accountable for implementation:
The CEOs of the companies are responsible for the implementation of the policies.
Availability: The policies are available to the public on the companies' websites as part of the PAI statements (@OTP Fund Management, @OTP Real Estate Investment Fund Management, @DSK Asset Management).
OTP Group does not have a policy related to water, biodiversity, and ecosystems.
The development of policies related to water,

[45] Sustainable Finance Disclosure Regulation, Regulation (EU) 2019/2088.

biodiversity and ecosystems must be preceded by a deeper analysis of the emerging risks in these areas.
Nevertheless, OTP Group's Code of Ethics declares the corporate group's commitment to environmental sustainability and environmental values (see @4.1 Corporate Governance).

Targets
ESRS E1-4, E3-3, E4-4, E1-9

OTP Group has defined two main goals regarding climate change: firstly, a portfolio-specific GHG emission reduction target as part of its **climate target setting;** and secondly, a goal related to **green lending.**[46]

Climate target setting

In line with regulatory expectations, in 2024 OTP Group defined targets[47] to reduce its financed GHG emissions by 2030. These targets are derived from Net Zero 2050 (NZE 2050) scenarios of the International Energy Agency (IEA) and national decarbonization plans as required by regulation, but they take into account the portfolio composition of OTP Group (in terms of countries and portfolio segments broken down by borrowers' activity types).
The Group-level targets were built up from country-, asset class- and sector-specific targets that were taken over either from the IEA's NZE 2050 sector-specific trajectories, which are by definition aligned with the objective of the Paris Agreement, or from national decarbonization plans whose GHG emission trajectories until 2030 are reasonably close the relevant sector-specific emission trajectories of the IEA's NZE 2050.[48]
The interpretation of the targets OTP Group has set is the following: if the economic environment of OTP Group progresses alongside the IEA's Net Zero 2050 scenarios, then OTP Group's financed emissions should reach the predefined targets, unless the Group turns to the financing of borrowers which are more carbon-intensive relative to the average of the economy than the current ones. Thus, these targets should be interpreted much more like a "baseline scenario" on which OTP Group's financed emissions progress if the worldwide transition to a carbon-neutral economy is successful. It is important to emphasize that OTP Group alone cannot ensure that these targets will be met if the economic environment follows a completely different trajectory. OTP Group alone cannot enforce the carbon-neutral transition either in the world economy, or in the countries, in which the Group is active. OTP Group can however put in place a number of measures to alter its course away from the path of the general economic environment to some extent (see more below).
OTP Group's targets for the reduction of its own financed carbon footprint are set for a range of scopes. The Group's primary goal is to reduce the financed Scope 1–2 emissions of its loan portfolio, excluding sovereign exposure, by 2030[49]. This target is based on the methodology for calculating financed emissions (Scope 3 emissions/Category 15), which we present in the @E1-6 disclosure requirement.
OTP Group's primary goal relates to the intensity of financed GHG emissions, i.e., the amount of financed Scope 1–2 GHG emissions per euro of exposure (g CO_2eq/euro)[50].
This is a relative target, as it focuses on reduction compared to the base year (2023), not the level to be achieved in 2030[51]. The metric underlying the target, which is limited to financed Scope 1–2 emissions excluding sovereign exposures, provides the most

[46] These goals should be interpreted as objectives in the subtopics of Climate Change Mitigation, Climate Change Adaptation and Energy.
[47] These targets apply to the GHG emissions related to the financing directly provided by the members of OTP Group, and not to the GHG emissions related to the assets managed by OTP Group's asset and fund management members.
[48] Defining target was executed by OTP Group's staff internally.
[49] Interim targets between 2023 and 2030 were not set as they were not deemed to be reasonable: the underlying metrics have a level of uncertainty due to data quality and methodological reasons that do not enable setting smaller, eventually annual targets. Also, the benchmark scenarios – such as NZE 2050 of IEA – do not have forecast points for intermittent targets until 2030.
[50] However, the Group is required to report its financed GHG emissions in HUF due to CSRD requirements. Therefore, the baseline and outcome levels of the reduction target are reported in g CO_2eq/HUF. We assume that the HUF/EUR exchange rate of the base year (2023) remains unchanged, and the effects of exchange rate fluctuations are excluded when assessing the achievement of the targets.
[51] Relative targeting is indeed beneficial because it helps to avoid distortions caused by changes in the size of the Group, such as acquisitions, divestitures, or fluctuations in market shares.

reliable and robust indicator for tracking the Group's financed emissions.

In addition to relative reduction targets, current legislation also requires OTP Group to set targets for absolute financed GHG emissions by 2030. We derive absolute targets from relative reduction targets, using a "static balance sheet assumption" (in line with various regulatory practices, such as EBA stress test procedures): that is, we assume that the Group's balance sheet and its structure will not change until 2030. Although this is not a realistic assumption, applying other assumptions would be highly speculative. OTP Group considers absolute reduction targets for financed GHG emissions to be subordinate to relative reduction targets: OTP Group will interpret that it has achieved its goals if the relative reduction targets are met, even if the absolute targets published here are not met simultaneously (e.g., due to future acquisitions, increasing market share etc.).

The Group's relative reduction target for 2030 for financed Scope 1–2 emissions – excluding the sovereign portfolio – is –29.8% compared to the 2023 base year, i.e., the reduction of the 2023 emission intensity of 219 gCO_2eq/euro or 0.57 g CO_2eq/forint in the defined portfolio segment and emission type to 154 g CO_2eq/euro (0.40 gCO_2eq/forint, assuming an unchanged forint/euro exchange rate) by 2030. This reduction target defined according to the composition of the Group's existing portfolios is consistent with the IEA NZE 2050 scenario's reduction target for the global economy.

OTP Group's target settings for financed Scope 1–2 emissions and without the sovereign portfolio:

	2023, base year	Climate target setting 2023–2030	2030, target
Total financed Scope 1–2 emissions (t CO_2eq)	9,183,905	static balance sheet assumption	6,447,102
Total loan volume from all PCAF-asset classes except sovereign (HUF million)	16,024,767		16,024,767
Financed Scope 1–2 GHG intensity of the portfolio without sovereign (g CO_2eq/HUF)	0.57	(29.8)%	0.40
CAGR of targeted reduction rate (2023–2030)		*(4.9)%*	

OTP Group sets targets for all GHG emissions, including scope 3 emissions, and for the entire portfolio, including sovereign exposures, in accordance with the Partnership for Carbon Accounting Financials (PCAF) Standard scope 3 emissions category 15. In this portfolio and emission scope, there are many items for which the quantification of the financed emissions for the base year or for any future years will remain very speculative and will lack robustness due to a series of methodological issues. Therefore, the OTP Group will consider its climate targets for financed emissions to be met in the future even if it only achieves the above relative emission reduction target for financed Scope 1–2 GHG emissions, excluding sovereign emissions, but does not meet its targets that also include financed Scope 3 emissions and sovereign exposures.

OTP Group's target settings for all financed GHG emissions (including financed Scope 1, 2 and 3):

	2023, base year	Climate target setting	2030, target
Total financed GHG emissions (t CO_2eq)	25,007,832	static balance sheet assumption	16,855,279
Total loan volume from all PCAF-asset (HUF million)	22,058,449		22,058,449
Financed GHG intensity of the portfolio in all PCAF asset classes (g CO_2eq/HUF)	1.13	(32.6)%	0.76
Az állított csökkentési cél évesített változata (2023–2030)		*(5.5)%*	

Disclaimers and potential future revisions of targets

It is important to emphasize that the quantification methodology of financed GHG emissions still contains a very high degree of uncertainty. Therefore, changes in this methodology and the underlying data that alter the results of the estimations on the Group's financed GHG emissions and make retrospective corrections necessary – possibly even in terms of magnitudes – should be expected. Furthermore, the monitoring of the financed emission reduction targets of OTP Group will inevitably make it necessary that the Group revises either the targets themselves or – more likely – the base year data compared to which those targets were set. The following events and developments might justify such retroactive revisions and a posteriori adjustments necessary (non-exhaustive list): a) having more reliable (reported and measured) emission data from borrowers; b) changes in price levels (inflation); c) changes in portfolio composition, d) changes in public policies with regard to climate change or any other issues; or e) any other unforeseeable event that make such adjustments reasonable.

OTP Group reserves all rights to adjust retroactively either the base year estimates of its financed GHG emissions or any other GHG-related indicators related to its GHG reduction targets or the targets themselves, if this is justified by the circumstances. If such retroactive adjustments are necessary to undertake, the Group shall provide satisfactory explanation for them.

Measures to reduce financed GHG emissions

The Group will monitor the pathway on which its financed GHG emissions progress until 2030, to assess whether reaching the reduction targets is still realistic. Also, the regulatory environment of the key GHG emitting industries will remain key in the decarbonization process.

However, OTP Group can take some measures by which it is able to decrease its financed GHG emissions on its own.[52] A non-exhaustive list of such measures is listed in the table below alongside their estimated impacts on the Group's financed GHG emissions per exposure volume.

Some of the measures (more green loans and transition financing, financing more electric cars) assume that the Group would increase the share of the greener, low-emission exposures and thus lower its financed GHG intensity measure. Other measures (cutting financing to coal-fuelled power plants, to the mining industries, to pollutive industries and to vehicle finance) assume that the Group would exit from the financing of high GHG-emitter industries and replace them with lower ones. Lowering financing ratios would decrease the Group's share in responsibility for the borrowers' GHG emissions.

When interpreting the above list of measures, it is important to note that the Group might decide on the implementation of these measures on a discretionary basis, but it does not commit automatically to taking all or even any of these measures.

Furthermore, when deciding whether to introduce any of these measures, it also considers factors other than the reduction of financed GHG emissions. These factors may include the Group's financial interests, social responsibility, and the impacts on its environment and stakeholders, feasibility, or energy security.

[52] As these measures are related to the "business-as-usual" application of the lending policy, it is not reasonable to support them by a CapEx and OPEX plans – which are more reasonable for industrial companies that have to undertake large investments into technological shifts.

List of potential steering measures and their estimated impacts on OTP Group' financed Scope 1–2 emissions per euro of exposure impacted:

Short name of measure	Impact in g CO_2 emission/HUF of exposures impacted	Description of measures
1. More green loans	(2.29)	Share of green loans would increase
2. Lower financing ratios	(0.76)	The loan volume weighted average financing ratio (attribution factor) would be decreased
3. Cutting financing to coal-fueled power plants	(2.01)	Annulate all loans where borrowers' electricity production is fueled by coal in more than 25% and provide the same amount of loans to average companies
4. Cutting finance to the mining industry	(2.64)	Annulate all loans to the mining industry and provide the same amount of loans to average companies
5. Less financing to heavy industries	(0.25)	Decrease loans to cement, steel, iron, aluminum, chemicals by 50% and replace them with loans to the "rest of the economy" (service sector)
6. Less vehicle loans	(0.60)	Decrease the amount of vehicle loans and provide the same amount of loans to an "average" client (based on total portfolio average emission intensity)
7. More electric cars	(0.38)	An increase of electric cars within the car finance

Note: the interpretation of the above table is the following: the estimated impact indicates the amount of GHG emissions in grams of CO_2eq per one euro of exposure impacted by the measure. E.g. - 0.38 CO_2eq/euro in case of measure "7. More electric cars" means that the Group's Scope 3/Category 15 GHG emission would decrease by 0.38 g CO_2eq if 1 euro of loan amount would be allocated to a car loan financing an electric car, whereas 1 euro of loan would be withdrawn from (or not provided to) a car loan financing an "average vehicle" (that is mostly a petrol-fueled one). Therefore, if we were to perform the same operation for HUF 1,000, the Group's financed scope 1 and 2 emission would decrease by 380 g CO_2eq.

The impacts of the measures presented in the table above were estimated using the following method: assuming a static balance sheet, we examined the effect of replacing higher GHG-intensity assets with lower GHG-intensity assets. We calculated the Group's exposure-weighted financed GHG emissions for both and then their difference. The GHG intensity of each asset was estimated using the same methods as those later presented in the section on GHG emissions (@Emissions, GHG Intensity). The impact calculation was based on the 2023 GHG intensity of each asset type and was static in the sense that we did not consider potential changes in the GHG intensity of each asset type by 2030, nor were the measures scalable. It should be noted that some measures can only be applied to a limited extent by the exposures: for example, the Group cannot withdraw more financing from coal-based power producers than it currently has exposure to such clients. Furthermore, when estimating the impacts of the measures, we did not consider factors that might hinder their implementation, such as the contractual maturities of existing exposures or the limited demand for "less polluting" loans etc. Therefore, the list of measures described above should be interpreted more as possible decision directions rather than a detailed and feasible action plan.

The approval of the climate target setting document by the Executive Steering Committee is planned for 05.02.2025.

OTP Group does not have a transition plan; a decision on its development is expected in the near future.

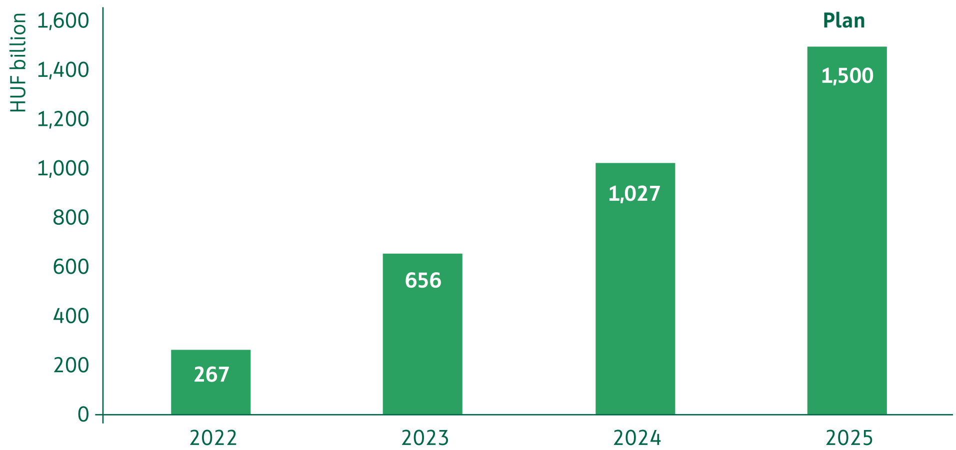
Green lending target

As in its ESG strategy declared in 2021, OTP Group's unchanged goal is to play a regional leading role in financing a fair and gradual transition to a low-carbon economy and to build a sustainable future with responsible solutions.[53]

The Banking Group plans to build a green loan portfolio worth HUF 1,500 billion by 2025. Green lending is a goal in all countries except Russia and Ukraine. In Russia consumer lending is predominant, so green lending is not a goal. In Ukraine, due to the war, there is no green lending that meets the standards, and its development is not a goal until the conflict is resolved.

[53] Green financing is an objective in all three climate change-related subtopics named in the ESRS, and OTP Group does not treat these topics separately. We have not identified a base year for the objective; we have been measuring green exposures in the portfolio since 2022.

End-of-year green exposure portfolio at group level



Green exposures refer to corporate green loan and bond exposures, as well as retail green loan exposures, according to OTP Group's own definition (see @green portfolio).

The goal for the green portfolio is not based on scientific evidence; it aligns with OTP Group's objective to finance the transition to a low-carbon economy. Achieving this goal will result in revenue growth for the corporate group. The relevant departments of OTP Group participated in setting this goal.

Additional targets

We do not publish a group-level goal for operational activities related to climate change mitigation. Partial targets for Scope 1–2 emissions currently exist at the subsidiary level for some subsidiaries. A group-level target, consistent with the Paris Agreement and based on the same reference, is planned for 2026, with further details to be developed in the next period. Emissions are continuously monitored, but the effectiveness of measures to reduce emissions is not currently measured.

OTP Bank's goal set in its 2021 ESG strategy is to achieve carbon-neutral operations by 2030. This absolute target covers Scope 1–2 emissions, with a recorded net-zero emission of 0 tCO_2e, without specifying a base year.

Net-zero emissions involve reducing greenhouse gas emissions as much as possible and neutralizing unavoidable emissions through carbon removal. The goal is not based on scientific evidence; the relevant departments of OTP Bank participated in its development. OTP Bank's market-based Scope 1–2 emissions were 6,644 tCO_2e in 2024[54]. OTP Bank primarily uses green energy for electricity, with about three-quarters of emissions coming from natural gas use and vehicle fuel consumption. The preparation of a plan to reduce emissions intensity related to properties and the fleet has begun, with an ESG Committee resolution to complete it in 2025.

Some foreign subsidiaries have expressed their commitment to reducing operational emissions in their ESG strategies. Several subsidiaries have achieved significant results, primarily through green energy procurement. Emissions are continuously monitored, but the effectiveness of measures to reduce emissions is not comprehensively measured. OTP Group currently does not have goals related to water, biodiversity, and ecosystems; developing these goals requires deeper analysis. The corporate group currently does not monitor the effectiveness of its policies and measures in these areas (the Group currently only has measures related to water).

[54] Comparability with previous years is not feasible due to the different reporting methodology required by the ESRS.

Actions and resources
ESRS E1-3, E3-2, E4-3

OTP Group has defined two main packages of measures regarding climate change: firstly, the portfolio-specific measures defined within the **climate target setting** detailed in the @E1-4 disclosure requirement, and secondly, the **green lending** measures[55] presented in chapter @2.1.2 and @Credit Rating. The measures of OTP Fund Management are represented by the funds with environmental objectives presented in chapter @2.1.1 Measures to reduce GHG emissions from operations are of lesser significance and are presented in aggregate.

Measures to Reduce Scope 1–2 Emissions

Primarily, the larger banks in the Banking Group are implementing or planning to implement measures to reduce carbon dioxide emissions. Among the planned measures, the procurement of green electricity has the greatest impact; in 2024 OTP Bank, OTP Bank Slovenia, OTP Bank Croatia, and OTP Bank Serbia mainly covered their consumption with green electricity. These practices are planned to continue in 2025. Additionally, planned measures include lighting replacement, boiler replacement, optimization of heating and cooling, insulation, and solar panel installation. OTP Bank Serbia and OTP Bank Albania have moved to more energy-efficient central buildings, with the Albanian bank's headquarters being LEED Gold certified.
The effectiveness of the implemented measures is monitored at the subsidiary level using various methods, and the results are not aggregated.
OTP Group has not yet defined measures related to biodiversity and ecosystems. A more detailed assessment of the impacts is necessary before developing appropriate measures.

Emissions, GHG Intensity
ESRS E1-6: GHG

OTP Group's gross Scope 1, Scope 2 and Scope 3 GHG emissions are presented in the table below.

[55] These measures should also be interpreted as actions in the subtopics of Climate Change Mitigation, Climate Change Adaptation, Energy, and Water Withdrawal.

OTP Group's GHG emissions:

	Retrospective				Milestones and target years		
	Base year 2023	Comparison 2023[1]	2024	2024/2023	2025	2030	Annual% target value/ Base year
Scope 1 GHG emissions							
Scope 1 gross GHG emissions (tCO_2e)	N/A	N/A	118,470	N/A	N/A	N/A	N/A
Percentage of GHG emissions from regulated emissions trading schemes in Scope 1 (%)	0	0	0	0	0	0	0
Scope 2 GHG emissions							
Scope 2 gross GHG emissions – location-based (tCO_2e)	N/A	N/A	58,076	N/A	N/A	N/A	N/A
Scope 2 gross GHG emissions – market-based (tCO_2e)	N/A	N/A	48,834	N/A	N/A	N/A	N/A
Significant Scope 3 GHG emissions							
Total[2] gross indirect (Scope[3]) GHG emissions (tCO_2e)	25,007,832	25,007,832	24,835,989	(1)%	N/A	16,855,279	(5.5)%
15. Investments	25,007,832	25,007,832	24,835,989	(1)%	N/A	16,855,279	(5.5)%
Total GHG emissions							
Total GHG emissions (location-based) (tCO_2e)	N/A	N/A	25,012,535	N/A	N/A	N/A	N/A
Total GHG emissions (market-based) (tCO_2e)	N/A	N/A	25,012,535	N/A	N/A	N/A	N/A

[1] Note: The issues disclosed in the "Comparative 2023" column are based on the composition of OTP Group as at 31 December 2024 and differ from the "Base year 2023" data, which represents OTP Group as at 31 December 2023. There are no other differences in methodology.
Biogenic emissions in 2024 were 734 tones.

[2] Note: The total gross indirect emissions of OTP Group (Scope 3) do not include funded emissions related to assets managed by the Group's subsidiaries acting as fund managers, as these assets are not part of the Group's consolidated assets (as they are not owned by OTP Group). The emissions for the year 2023 do not include the OTP Bank Romania group.

Allocation of OTP Group Scope 1–2 emissions, 2024:

	Consolidated financial reporting group	Operational management
Scope 1 gross GHG emissions (tCO_2e)	114,940	3,530
Scope 2 gross GHG emissions – location-based (tCO_2e)	53,668	4,409
Scope 2 gross GHG emissions – market-based (tCO_2e)	41,561	7,273

Among the Scope 2 emissions, OTP Group members cover part of their electricity consumption with green electricity certified by guarantees of origin or renewable energy certificates. 36.49% of the total electricity consumption comes from such sources. There is no district heating consumption certified by guarantees of origin. 31.23% of energy consumption related to Scope 2 emissions comes from consumption certified by guarantees of origin. The certificates are provided to the subsidiaries by utility providers.

GHG intensity based on revenue:

	Comparison	2024	%, 2024/2023
Total GHG emissions per net revenue (location-based) (tCO_2e/million HUF)	N/A	5,85	N/A
Total GHG emissions per net revenue (market-based) (tCO_2e/million HUF)	N/A	5,85	N/A

Scope 3/Category 15 emissions

Scope 3/15 emissions are also referred to as "OTP Group financed emissions" or "our financed emissions". In this section of the report, we first present OTP Group's financed emissions and later describe the underlying estimation methodology.

Scope 3/Category 15 emissions in 2023

The below table provides an overview on OTP Group's financed emissions (Scope 3/ Category 15) in 2023 by PCAF asset classes and by the type of emission scope of the clients. OTP Group considers the most reasonable and reliable indicator of its financed emissions to be the sum of financed Scope 1–2 emissions of all PCAF asset classes without sovereigns, which accounted for 9.2 million tons CO_2eq. This is the most meaningful indicator of OTP Group's financed carbon footprint, as Scope 3 emission estimates are very speculative and so are emission estimates for sovereign exposures in general. The bulk (73%) of this financed Scope 1–2 emissions is coming from the business loan segment. A material contributor with a 20% share was the vehicle financing portfolio. Financed emissions of the real estate related portfolios (whether residential or commercial) represent a fraction of the total financed emissions – in line with macro-statistics of buildings' share in global GHG emission.

OTP Group's financed GHG emissions broken down by PCAF asset classes, 2023 (w/o OBR Group):

<table>
<tr><th>PCAF asset class</th><th>PCAF average data quality score</th><th>Total exposure</th><th>Financed Scope 1 emission</th><th>Financed Scope 2 emission</th><th>Financed Scope 3 emission</th><th>Total finance emissions</th></tr>
<tr><td>(Unit of measurement):</td><td></td><td>(HUF million)</td><td>(tons CO_2eq)</td><td>(tons CO_2eq)</td><td>(tons CO_2eq)</td><td>(tons CO_2eq)</td></tr>
<tr><td>Listed equity and corporate bonds</td><td>4.4</td><td>488,160</td><td>158,577</td><td>31,489</td><td>451,391</td><td>641,457</td></tr>
<tr><td>Business loans, unlisted equity and project loans</td><td>4.2</td><td>8,284,605</td><td>5,266,204</td><td>1,222,157</td><td>10,763,652</td><td>17,252,014</td></tr>
<tr><td>Commercial real estate financing</td><td>5.0</td><td>570,766</td><td colspan="2">44,075</td><td>N/A</td><td>44,075</td></tr>
<tr><td>Mortgages</td><td>4.1</td><td>5,134,422</td><td colspan="2">651,600</td><td>N/A</td><td>651,600</td></tr>
<tr><td>Vehicle loans</td><td>4.8</td><td>1,546,814</td><td colspan="2">1,809,803</td><td>N/A</td><td>1,809,803</td></tr>
<tr><td>Total without sovereign debt</td><td>4.3</td><td>16,024,767</td><td colspan="2">9,183,905</td><td>11,215,043</td><td>20,398,948</td></tr>
<tr><td>Sovereign debt</td><td>1.4</td><td>6,033,682</td><td>2,543,807</td><td>487,273</td><td>1,577,804</td><td>4,608,884</td></tr>
<tr><td>Total (all PCAF asset classes)</td><td>3.5</td><td>22,058,449</td><td colspan="2">12,214,985</td><td>12,792,847</td><td>25,007,832</td></tr>
</table>

Regarding the financed GHG intensity (financed emissions/outstanding financing volume), which forms the basis of OTP Group's main climate target (financed emission reduction targets), the most relevant indicator with the smallest estimation uncertainty is also the Group's financed Scope 1–2 intensity excluding the sovereign portfolio, which was 0.57g CO_2eq/HUF in 2023.
The most GHG-intensive portfolio segments were the corporate segment and vehicle financing.

Financed GHG intensity (financed emissions/loan volume provided) of OTP Group's portfolio in 2023, w/o OBR Group:

PCAF asset class	Financed Scope 1 intensity	Financed Scope 2 intensity	Financed Scope 3 intensity	Total emission intensity
(Unit of measurement):	(g CO_2eq/HUF)	(g CO_2eq/HUF)	(g CO_2eq/HUF)	(g CO_2eq/HUF)
Listed equity and corporate bonds	0.32	0.06	0.92	1.31
Business loans, unlisted equity and project loans	0.64	0.15	1.30	2.08
Commercial real estate financing	0.08		N/A	0.08
Mortgages	0.13		N/A	0.13
Vehicle loans	1.17		N/A	1.17
Total without sovereign debt	**0.57**		**0.70**	**1.27**
Sovereign debt	0.42	0.08	0.26	0.76
Total (all PCAF asset classes)	**0.55**		**0.58**	**1.13**

Financed GHG emissions (Scope 3/Category 15) of OTP Group in 2024

OTP Group prepared a preliminary estimation for its financed emissions for 2024. These estimations were based on the same approach as in the estimates for 2023, however on less complete data. The underlying reason for the latter is that much essential data[56] to quantify the financed emissions of OTP Group was not available before the cut-off date of the recent Integrated Report.

The below table provides an overview on OTP Group's financed emissions (Scope 3/ Category 15) in 2024 by PCAF asset classes and by the type of emission scope of the clients.

OTP Group's total financed emissions broken down by emission scopes and asset classes as for 2024:

PCAF asset class	PCAF average data quality score	Total exposure	Financed Scope 1 emission	Financed Scope 2 emission	Financed Scope 3 emission	Total finance emissions
(Unit of measurement):	(1–5)	(million HUF)	(tons CO_2eq)	(tons CO_2eq)	(tons CO_2eq)	(tons CO_2eq)
Listed equity and corporate bonds	4.4	549,420	169,045	32,618	472,556	674,219
Business loans, unlisted equity and project loans	4.1	8,558,410	4,339,808	1,095,399	10,094,675	15,529,883
Commercial real estate financing	4.8	706,425	47,570		N/A	47,570
Mortgages	4.1	6,035,650	586,892		N/A	586,892
Vehicle loans	4.6	1,980,147	2,025,430		N/A	2,025,430
Total without sovereign debt	**4.2**	**17,830,052**	**8,296,763**		**10,567,231**	**18,863,994**
Sovereign debt	1.4	8,871,078	3,312,631	623,254	2,036,110	5,971,995
Total (all PCAF asset classes)	**3.3**	**26,701,130**	**12,232,648**		**12,603,341**	**24,835,989**

The financed GHG intensity of OTP Group (financed emissions/financed volume) in 2024, according to the most relevant indicator with the smallest estimation uncertainty, was 0.47 g CO_2eq/HUF, which is 19% lower than in 2023. This significant decrease can be explained by several factors: the weakening of the HUF against the EUR in the meantime (excluding the exchange rate effect, the change in Group's financed GHG intensity would have been only -13%). Other reasons for the decrease include: some major polluters repaid their loans, other larger polluters significantly increased their balance sheets while the loans provided by the Banking Group remained unchanged (thus the "attribution factor" allocating the debtor's GHG emissions to Group decreased), and the financing ratio of heavy machinery, which is more GHG-intensive, decreased in the vehicle financing portfolio. In addition, changes in the quality of the data used also affected the results. Overall, it can

[56] For example: financial figures (such as total assets and revenues) of corporate borrowers for the business year of 2024, because these will have to be published only by May 2025 in many countries, whereas calculations of financed GHG emissions of OTP Group had to be submitted to the auditor by the beginning of February 2024.

be said that OTP Group had no influence on most of the factors causing the decrease in its financed carbon footprint and will not have any influence in the future. Therefore, it is important to emphasize that the decreasing trend observed between 2023 and 2024 cannot be projected into the future; on the contrary, this relatively significant change in the Group's financed GHG emissions highlights the shortcomings and low robustness of the carbon footprint calculation methodology defined by the PCAF standard, so a similar magnitude but opposite change cannot be ruled out in the next year.

Financed GHG intensity (financed emissions/loan volume provided) of OTP Group's portfolio in 2024:

<table>
<tr><th>PCAF asset class</th><th>Financed Scope 1 intensity</th><th>Financed Scope 2 intensity</th><th>Financed Scope 3 intensity</th><th>Total emission intensity</th></tr>
<tr><td>(Unit of measurement):</td><td>(g CO_2eq/HUF)</td><td>(g CO_2eq/HUF)</td><td>(g CO_2eq/HUF)</td><td>(g CO_2eq/HUF)</td></tr>
<tr><td>Listed equity and corporate bonds</td><td>0.31</td><td>0.06</td><td>0.86</td><td>1.23</td></tr>
<tr><td>Business loans, unlisted equity and project loans</td><td>0.51</td><td>0.13</td><td>1.18</td><td>1.81</td></tr>
<tr><td>Commercial real estate financing</td><td colspan="2">0.07</td><td>N/A</td><td>0.07</td></tr>
<tr><td>Mortgages</td><td colspan="2">0.10</td><td>N/A</td><td>0.10</td></tr>
<tr><td>Vehicle loans</td><td colspan="2">1.02</td><td>N/A</td><td>1.02</td></tr>
<tr><td>Total without sovereign debt</td><td colspan="2">0.47</td><td>0.59</td><td>1.06</td></tr>
<tr><td>Sovereign debt</td><td>0.37</td><td>0.07</td><td>0.23</td><td>0.67</td></tr>
<tr><td>Total (all PCAF asset classes)</td><td colspan="2">0.46</td><td>0.47</td><td>0.93</td></tr>
</table>

Financed Emissions of Managed Assets

Besides the above, OTP Group has group members which are asset and fund managers. Estimated financed GHG emissions associated with the assets managed by these Group members amounted to 5.8 million tonnes CO_2eq in 2024 (for all emission types, calculated on a coverage-adjusted basis). The estimation of financed GHG emissions of the assets managed was performed by MSCI as an external service provider (except for assets in real estate funds, which is OTP Group's own internal estimate).

OTP Group does not consider the funded issuance related to the assets managed by the fund and asset management Group members as part of the Group's funded issuance, as the Group does not own these assets nor are they included in the consolidated assets of OTP Group.

Financed GHG emissions related to assets managed by OTP Group's fund and asset management members in 2024:

Asset class	PCAF average data quality score	Managed assets	Coverage-adjusted financed emissions (Scope 1 and 2)	Coverage-adjusted financed emissions (Scope 3)	Coverage-adjusted financed emissions (Total)
(Unit of measurement):	(1–5)	(HUF billion)	(tons CO_2eq)	(tons CO_2eq)	(tons CO_2eq)
Assets not in real estate funds	3.7	4,209	1,616,427	3,210,721	4,827,148
Assets in real estate funds	5.0	691	4,055	16,386	20,441

GHG removals and carbon credits and Internal carbon pricing
ESRS E1-7, E1-8

In 2024, within the corporate group, OTP Bank purchased carbon credits amounting to 7,000 tCO_2e. This amount covers OTP Bank's total Scope 1–2 emissions. The carbon credits retired during the reporting period were verified according to the Verified Carbon Standard by Verra. The Bank considers it essential that the project supported through the offsetting is implemented in the country where the Banking Group operates. Therefore, the only project supported by the purchase is the Sant Nikola Wind Farm near Kavarna, Bulgaria, which is the largest wind farm in the country. The project is a reduction project and does not qualify as a corresponding adjustment under Article 6 of the Paris Agreement.[57]
OTP Bank's goal of carbon-neutral operations includes the use of carbon credits as well. The use of carbon credits does not hinder the achievement of the net-zero target for Scope 1–2 by 2030, considering that OTP Bank has begun developing emission reduction plans based on energy efficiency and renewable energy use. Additionally, as compensation for the Bank's operational carbon footprint, we plan to replace the carbon credits purchased based on our current practice with so-called 'ecosystem restoration certificates'. In collaboration with Pilisi Parkerdő Ltd. as a partner, we aim to develop a 400-hectare nature conservation area, the so-called Budakeszi Vadaskert, with a complex urban forest approach. This development somewhat places the economic aspects of the classic triad of forest functions – economic, conservation, and public welfare – into the background in order to preserve and enhance the natural and ecological values of forests and promote ecotourism development that aligns with the natural values of forest areas. The Bank has multiple goals in regard to this project: it offers a platform for professional collaborations and scientific work in biodiversity, climate adaptation, carbon sequestration, and ecosystem services. On the other hand, it is suitable for promoting sustainability awareness among our employees by focusing on the non-financial aspects of forest area usage; furthermore, the project can also shape the Bank's image.
The corporate group does not apply internal carbon pricing.

Transition plan and consideration of biodiversity in strategy and business model, significant negative impacts
ESRS E4-1

The disclosure requirement is presented as part of the @ESRS 2 SBM-3 .

2.3 Reporting policy regarding chapter E

Green lending criteria and definitions used in the voluntary Green Portfolio Report
Green exposure defined based on the bank's green definition: on-balance loans, advances, leasing, and bond exposures that have undergone an internal green rating process and meet the technical screening criteria of any of the following frameworks: OTP Group Green Loan Framework, OTP Group Sustainable Finance Framework, the green housing, green corporate and municipal capital requirement discount program of the Hungarian National Bank, and the NHP Green Home.
As for all Hungarian banks, the main criteria that underpin the bank's green definitions are the Green housing capital requirement discount program 2020–2021 and the Green corporate and municipal capital requirement discount program 2020–2021 of the Hungarian National Bank. These national programs define the baseline criteria for the green portfolios reported by the Bank.

For information on the compliance with the EU Taxonomy eligibility and alignment criteria of the bank's framework, please see
@OTP Group Green Loan Framework
@OTP Group Sustainable Finance Framework

[57] The project is 100% a mitigation project, implemented 100% in the EU, and certified 100% based on recognized quality standards.

Green criteria for non-financial corporations are set out in the following frameworks:

- OTP Group Green Lending Framework
- OTP Group Sustainable Finance Framework
- Green corporate and municipal capital requirement discount program of the Hungarian National Bank

These frameworks form the basis of OTP Bank's voluntary green lending portfolio.
The update of the @OTP Group Green Loan Framework, also supported by an external expert opinion (SPO), was approved by the Hungarian National Bank in July 2023. This also ensures that loans that meet the conditions of the Bank's Framework are eligible for the Green corporate and municipal capital requirement discount program of the Hungarian National Bank as „Category B" transactions, which defines the scope of "eligible transactions under a Framework".
The Green Loan Framework covers nonresidential customers, from large multinational corporations to micro-enterprises, including municipalities and condominiums.

Retail green lending

In terms of residential green lending, the Green housing capital requirement discount program of the Hungarian National Bank and the NHP's Green Home program form the core of the lending. These programmes comply with the specifics of Hungarian legislation – and EU legislation, e.g. (9/2023 (25. V.) of the Decree on the Definition of the Energy Performance of Buildings and the NZEB requirements – ensuring that the OTP Group's definition of green for residential green lending is in line with the relevant legislation.
Main differences between the mandatory EU taxonomy indicators and the voluntary green portfolio:
The voluntary GAR portfolio is defined in a centrally maintained Group controlling database, monitored monthly, and extends to companies and households that are not subject to NFRD, as well as those outside the EU. Compliance with criteria is assessed by the Bank's experts.
In contrast, the mandatory GAR KPIs of the OTP Group are prepared semi-annually with the help of dedicated internal data requests, in accordance with the methodology prescribed by the regulation – EU 2021/2178, using only the Taxonomy KPIs and their gross carrying amount (exposures) with unknown use of proceeds of companies that fall under the NFRD in corporate financing and those exposures with known use of proceeds that are aligned with EU Taxonomy.

Scope 1–2 emissions

50. a Emission of the Group preparing consolidated financial statements: emissions derived from the assets listed in the balance sheet of entities belonging to the consolidated accounting group according to IFRS, in a financial control approach, including emissions derived from assets under IFRS 16.
50. b Entities (except under 50. a) under operational control including investees (such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group), as well as contractual arrangements that are joint arrangements not structured through an entity (i.e. jointly controlled operations and assets). **Operational control:** Operational control (over an entity, site, operation or asset) is the situation where the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation or asset.
48. b The Group is not subject to emission trading schemes, therefore Scope 1 GHG emissions from regulated emission trading schemes are not relevant.
The calculation methodology for Scope 1 and 2 emissions is the same for sections 50. a and 50. b.
48. b In those instances when the invoice for the consumption is not available, estimates will be made for the missing items. Given the small amount of this emission item, this does not cause significant uncertainty in Scope 1–2 emissions.
48. a, AR 43. a The Scope 1 emission calculation includes emissions resulting from fuel/

energy consumption of vehicles, natural gas, and the use of air conditioners and server coolers. CH_4 and N_2O content of biogenic emissions is calculated separately from the Scope 1 emissions. Ratio of biofuel consumption is calculated by using default values; If the fuel consumed has a different biofuel-content, then individual ratios are used.

48. b If the quantity of emissions from air conditioners and server coolers is not available, an estimate will be made. This does not cause a high degree of uncertainty in Scope 1 emissions, considering the small amount of this type of emission.

For the calculation the latest IPCC report is used, which is currently the Sixth Assessment Report (AR6).

The Group discloses non-mechanical GHG emissions related to agricultural production in accordance with the GHG Protocol Agricultural Guidance, the calculation calculation was carried out using a calculator developed by AKI Agrárközgazdasági Nonprofit Ltd. The emission source categories considered in the calculator were determined in accordance with the GHG Protocol, and the methods were developed based on the methodology published in 2006 by the Intergovernmental Panel on Climate Change (IPCC), taking into account the 2019 amendments (IPCC 2006, IPCC 2019). The calculator quantifies CO_2, CH_4, and N_2O emissions related to crop production and livestock farming. For crop production, the following were determined: N_2O emissions from the use of synthetic and organic fertilizers; CO_2 emissions from the use of urea and CAN-type fertilizers; CO_2 emissions from soil liming; N_2O emissions from crop residues; and indirect N_2O emissions (from atmospheric deposition and nitrate leaching). For livestock farming, CH_4 emissions from animal digestion and CH_4 and N_2O emissions from manure management were determined.

AR43. c Biogenic emissions are calculated separately from other Scope 1 emissions.

Scope 2 emissions are related to electricity and district heating consumption. OTP Group discloses Scope 2 emissions separately as location-based and market-based emissions.

Sources of emission factors:

Scope 1: Emissions from mineral and biofuels, as well as natural gas: local NIR (National Inventory Report) or IPCC 2006 guidelines. Fuel calorific value: local NIRs or EMEP/EEA air pollutant emission inventory guidebook. In Slovenia, the Slovenian Environmental Agency. Non-biogenic emissions from biofuels: DEFRA. Other fuels: DEFRA or another credible source from the member company. The emission factors used comprehensively cover all greenhouse gases.

Scope 2: Electricity: market-based emission factors are provided by utility providers, in the absence of which the Group uses the residual mix factors of the AIB (Association of Issuing Body) where available. In countries where residual mix is not available, the local and market factors are the same, with the source of emission factors being the IFI harmonized grid factors. The emission factor for electricity includes only CO_2.

For district heating, the Group uses the emission factor provided by MATÁSZSZ in Hungary, the Energy Institute Hrvoje Požar in Croatia, and Bureau Veritas in Slovenia. For other countries, the DEFRA factor is used. The local-based and market factors are the same.

The emission factors include all relevant greenhouse gases.

For renewable electricity purchased through contractual instruments (Guarantees of Origins or Renewable Energy Certificates) the market-based emission factor applied is 0.

AR 45. d The share of contractual instruments is calculated as the total amount of electricity purchased from renewable contractual agreements, divided by the total amount of electricity purchased. Information about the types of contractual instruments is determined in the Guarantees of Origins or Renewable Energy Certificates.

AR 43. Biogenic emissions related to Scope 2 are not relevant for the Group.

AR 46. Scope 3 emissions:

AR 46 c, d, i OTP Group has conducted a high-level estimation of Scope 3 GHG emissions for Categories 1–14 using the PCAF Score 5/Option 3c methodology. Therefore, the calculation exclusively focuses on Category 15.

Category 15 emissions – emissions financed through investments

AR 46. a, b Scope 3/Category 15 GHG emissions of OTP Group are those that are related to emissions of clients to which OTP Group provides funds in the form of loans or equity, or through investing into their securities. The general logic of allocating such emissions to the bank is the following: we take the clients' (borrowers') total GHG emissions, then we allocate them to the Group in proportion to the financing ratio of the client/borrower (e.g. the client's loan outstanding/the client's total assets or the client's loan outstanding/financed asset of the client.

When covering clients' (borrowers') GHG emissions, all emission types have to be included as requested by the relevant EU-regulation: Scope 1 emissions (resulting from fossil fuels that the client burns directly), Scope 2 emissions (resulting from the production of electricity and heating that the client uses) and Scope 3 emissions (all emission that arise in the client's supply chain). The reliability by which these estimations can be measured or at least estimated is very different: Scope 1 emissions could ideally be even measured or at least estimated with a relatively low level of uncertainty, if client would measure and report them (which is not the case for most OTP Group clients). Scope 2 emissions cannot be measured, only estimated with some uncertainty: while the volume of electricity or heat used by the client could be ideally measured and reported by the client (though it is not the case for the bulk of OTP Group's portfolio), the underlying GHG emissions of such energy used can only be estimated, but not measured (as those depend on the actual fuel mix of the grid from which the client bought such energy). Scope 3 emissions of clients can only be estimated with a very large level of uncertainty, as even the clients do not fully control, and thus have not enough information of the emission profile of their supply chain (except for a few exceptions). Therefore, OTP Group considers only estimations on clients' Scope 1 and 2 emission indicators as relatively reliable ones, whereas we deem estimations on Scope 3 emissions of clients (borrowers) to be completely speculative.

OTP Group quantifies its financed emissions based on the methodology described by the PCAF Standard[58] as requested by relevant EU regulation (ESRS/CSRD). The essence of the approach is that a bank providing funds to a client has to use the client's GHG emission as a basis and then allocate part of it to the bank's financed GHG emissions based on the client's financing ratio (called also the "attribution factor", equal to the loan provided to the client/value of the financed asset or the total assets of the client).

This financing ratio defines the share of GHG emission of the borrower which the financing bank can be made responsible for (according to the underlying regulation). GHG emission of the clients should be quantified on emission values measured and reported by the client. However, by end of 2024, most borrowers of OTP Group have not reported (and many of them not even measured) their own GHG emissions. In fact, OTP Group has reported emission data only from 111 of its corporate clients (accounting for less than 4% of the total business loan portfolio) and even most of these are not audited by an independent third party. The availability of reported corporate emission data might improve somewhat as CSRD will apply to more and more companies. As the first step to enhance the accessibility and quality of data, OTP Bank plans to analyze the gap regarding internal data management processes.

Therefore, OTP Group had to prepare its own estimations for its borrowers' GHG emissions. These estimations were based on the financial figures (such as revenues and total assets) of clients (borrowers) and GHG emission intensity factors (e.g. on emissions/revenue by activity types) from external data providers. OTP Bank – as a PCAF signatory – has access to emission intensity factors that

[58] PCAF (2022). The Global GHG Accounting and Reporting Standard Part A: Financed Emissions. Second Edition.

were made available by PCAF.[59] However, the PCAF-databases do not provide emission intensity factors for all countries and/or asset types which are relevant for OTP Group: in such cases, proxies of similar (in economic and environmental terms) countries or asset types were used.
OTP Group prepares the estimate of financed GHG emissions disclosed in this document based on the same methods and data as in its Pillar 3 disclosures on ESG risks.

GHG intensity

AR 53. a, b, c GHG intensity ratio is calculated by the following formula: Total GHG emissions (tCO_2eq)/Net revenue (Monetary unit in million HUF). GHG intensity ratio is calculated with both the location-based and the market-based method.
AR 53. d The calculation of net revenue is in accordance with the accounting standards applied to financial statements. Net revenue is the sum of Interest income and income similar to interest income + Income from fees and commissions + Other operating income in the 2024 consolidated IFRS report of OTP Bank Plc. Consolidated Income Statement.

2.4 ESG risk management

The Group pays particular attention to managing ESG risks and implementing climate protection aspects into business practices. The Banking Group's risk management and business area pay special attention to integrating various risks related to green loans. OTP Bank has detailed risk management policies covering all types of risks (credit, market, liquidity, operational), which are in line with the laws regulating prudent banking operations: The assessment of the adequacy of ESG risk management is primarily based on the recommendation 10/2022 (VIII. 2.) issued by the Hungarian National Bank (Green Recommendation), which describes the expectations for credit institutions regarding climate change and environmental risks, as well as the enforcement of sustainability aspects. The recommendation sets specific expectations for managing environmental risks. Compliance with the Green Recommendation is regularly reported to the Board of Directors, the Management Committee, the ESG Committee, and the Risk Management Committee.
The Bank also monitors the supervisory and regulatory expectations of the European Banking Authority (EBA) and the European Central Bank (ECB). The ECB has direct supervisory authority (JST) over DSK Bank in Bulgaria and OTP Bank Slovenia, so compliance with these institutions' expectations receives special attention in examining and managing environmental and climate risks. DSK Bank, OTP Bank Slovenia and OTP Bank Croatia have integrated ESG Risk factors into their risk management system with local supervisory expectations.

The Bank manages its sustainability-related risk management guidelines based on the following non-public documents:
- Organizational and Operational Regulations
- OTP Banking Group Governance Regulations
- The internal defense lines system at OTP Bank
- The Rules of the Remuneration Policy of OTP Bank and the Banking Group

[59] In case of corporate loans and bonds and equity exposures, OTP Group relied on the emission intensity factors of the PCAF/Exiobase dataset. Emission intensity data in this dataset relies on environmentally extended IO tables, and thus does not cover (mostly) downstream Scope 3 emissions. Therefore, our estimations on clients' Scope 3 emissions might be underestimated – however, there are no reliable estimations on downstream emission intensity factors for a wide spectrum of industries and countries according to our knowledge. Intensity data in the PCAF/Exiobase dataset is from the year 2019 as it was made available by PCAF in 2024 – relying on data from 2019 to estimate borrowers' emissions in 2023/2024 might lead to some overestimation as national emissions (in countries where OTP Group is present) mostly stagnated between 2019-2024, whereas price levels – and thus average sizes of loans or average levels of revenues – have gone up.
For commercial and residential real estate loans, OTP Group relied on emission intensity factors of residential and commercial buildings (either per building or per m2) the PCAF/CRREM (Carbon Risk Real Estate Monitor) dataset. Data in this dataset is from the year 2023. It has to be noted that emission intensity factors from this dataset sometimes differs from that published by national authorities. Also, PCAF/CRREM does not provide data separately for Scope 1 and Scope 2 emissions of buildings, only for the combination of them.
For vehicle loans, OTP Group relied on emission intensity factors from the PCAF Motor Vehicle Loan Dataset. Although this dataset provides intensity factors for a wide range of different vehicles and car types, OTP Group relied only on the emission intensity by country and main vehicle types (passenger car, van, heavy vehicle).
For the sovereign exposures, OTP Group relied on the exact same data sources as they were provided in the chapter on "Sovereign debt" of the PCAF Standard.

- The Rules of the Performance Measurement and Evaluation System of OTP Bank and the Banking Group subsidiaries
- The Guidelines for the Leading Bodies and Standing Committees of the Banking Group Credit Institutions
- Group Credit Risk Policy
- Group-Level Trading Market Risk Management
- Market Risk and Foreign Exchange Risk Management for the Trading Book
- OTP Group Risk Strategy
- OTP Group Risk Appetite Statement
- Corporate Lending Policy/Operational Lending Limits and Guidelines (OLLP)
- The CEO's directive on managing the greenwashing risk of OTP Bank
- Corporate Client Risk Management Manual (OTP Bank)
- OTP Banking Group Risk Appetite Framework
- Collateral Valuation Policy
- Operational Risk Management Policy

The Bank develops its ESG risk management practices based on the following voluntary standard expectations:

- NGFS, The Network of Central Banks and Supervisors for Greening the Financial System
- GHG, Greenhouse Gas Protocol
- PCAF, Partnership for Carbon Accounting Financials

2.4.1 ESG Risk Management Function and Integration of ESG Risks into Risk Management Procedure

OTP Bank has incorporated ESG risks into its group-level risk management guidelines and procedures, enabling the identification and management of these risks to minimize emerging credit, reputational, regulatory, and legal risks. ESG risk management within OTP Group is integrated into various levels of the risk ecosystem: OTP Group Risk Strategy, OTP Group Risk Appetite Statement, the risk management frameworks for different risk types, and the Operational Lending Limits and Guidelines. OTP Group applies a gradual approach to ESG-related risk limits, and the Risk Appetite Statement and Group-Level Operational Lending Limits and Guidelines (OLLP) already include such restrictions.
In connection with the group-level risk strategy for 2023-2025, a **group-level risk strategy** with ESG relevance will be defined, aiming for a higher level of implementation of ESG risk factors. The ESG risk strategy will define additional ESG-level focus programs to strengthen ESG risk awareness. The ESG risk strategy includes assessing the short (<1 year), medium (1-5 years), and long-term (>5 years)[60] physical and transitional risk factors resulting from climate change in the portfolio (Climate and Environmental Materiality Assessment) for significant sectors. As a result, it will further develop the ESG-relevant parts of the risk appetite and set limits to serve the Bank's long-term sustainable portfolio more effectively.
The assessment also supports the preparation of the Group-Level Climate and Environmental Risk Heatmap and the implementation of all identified relevant "E" (environmental) factors.

2.4.2 Credit Risk

Corporate Credit Risk Management

To manage the credit risk aspect of ESG risks, OTP Group has been applying its ESG risk management framework in corporate lending since 2021. The main elements of the framework are the ESG exclusion list, the sectoral ESG risk heatmap, and the ESG risk assessment.
The ESG exclusion list defines activities in which OTP Group does not participate directly due to their controversial nature and impact.
The sectoral ESG risk heatmap includes the ESG risk categorization of each economic activity in the NACE classification, considering the environmental and social impact of the respective industry.
The ESG risk assessment includes determining ESG risk categories at client and transaction levels, including client due diligence

[60] These time horizons are different from the time horizons used in OTP Group, in line with the EBA's expectations.

in predefined cases. The Group applies a different method for leasing transactions where the financed asset is motorized; in these cases, the ESG risk category is determined based on the estimated environmental impact of the asset's engine (considering European vehicle emission standards). ESG aspects are considered in individual corporate lending decisions. The methods are continuously developed in line with the expansion of available data and methodologies.

In corporate lending – as for the Hungarian operations – the Hungarian National Bank (MNB) prescribes the application of a special examination framework and a minimum ESG questionnaire for client due diligence related to environmental and climate risk assessment, starting from 2025 with a phased implementation. The Bank is working to ensure compliance with the recommendation according to the schedule outlined in the recommendation.

In the Corporate Lending Policy/Operational Lending Limits and Policies (OLLP) – with the exception of the Uzbek and Russian subsidiary banks – lending guidelines from an environmental and climate risk perspective, as well as financial risk assessment guidelines based on environmental risks, have been formulated. As part of the policy, financing guidelines and examination frameworks related to renewable energy production, a key element of green lending, are also included. OTP Group currently has an internal, non-public guideline related to financing coal mining and coal-based energy production activities. The review is currently in progress, and upon its completion, the Group intends to make this policy public.

Regarding credit risk, the group also applies limits related to the corporate ESG risk management process. A group-level limit is applied to the ESG exclusion list, and in 2023 a new numerical limit was introduced in the Hungarian operations and certain subsidiaries to limit the proportion of new transactions with high ESG risk ratings within new risk-taking. The range of applied limits is gradually expanding, and the limits are recorded in the Risk Appetite Statement or the Corporate Lending Policy, currently not public. Compliance with the limits is regularly monitored on a quarterly and monthly basis. The methodology is continuously developed, with plans to introduce additional risk limits and apply ESG-specific lending guidelines.

From 2023, monthly internal reports on group-level ESG credit risk exposure are prepared for the corporate loan portfolio for the Credit and Limit Committee, and quarterly for the Board of Directors.

Collateral management

In the case of collateralized commercial real estate, the ESG assessment methodology developed by OTP Mortgage Bank has been applied in the Hungarian operations since February 2023. This is due to the bank's significant exposure to commercial real estate, where the proper ESG-relevant evaluation is a primary consideration.

The current rating is based on simplified ESG factors (E, S, G), and the general factors will be expanded based on the relevant factors detailed in the C&E Materiality Assessment. ESG data fields have been created in the bank's corporate loan registry system, and the process of populating these with actual content is partially automated from the information available in the state Lechner Knowledge Center database, with the most important data being the indicator of the energy efficiency of the collateral. The sharing of the collateral ESG methodology with subsidiaries is currently ongoing. For subsidiaries, the implementation of ESG methodologies for collateral related to vehicles is in progress according to pre-agreed deadlines. Merkantil Bank has its own ESG methodology for leasing assets according to the appendix of the current Group Credit Risk Policy. In this regard, the methodologies presented below show the practice of OTP Bank, and the implementation in subsidiaries is currently ongoing.

Immovable property

OTP Mortgage Bank considers and records the location, technical, and energy characteristics of commercial or residential real estate in its own records during the valuation of real estate collateral. As a result of the developments already implemented, ESG-specific data fields have been created for real estate collateral in the corporate segment's collateral registry system.

In the retail segment, residential properties taken as collateral are classified into the following risk categories based on their energy rating on the energy certificate or estimated energy efficiency, which are updated quarterly to monitor the portfolio-level transition risk:
- Low (A+++, A++, A+, A, B)
- Medium (C, D)
- Moderately high (E, F)
- High (G, H, I)

During the real estate collateral valuation process and related monitoring activities, the following physical risk elements are integrated:
- drought
- flood
- heatwave

Movable Property

For movable collateral relating to vehicles, OTP Bank has also developed an IT-supported framework for identifying ESG risks. The guidelines and methodologies related to this are continuously shared with subsidiaries.
As a result, vehicle-type movable collateral is classified into ESG1/2/3/4 categories, and the classification result is displayed in the corporate collateral registry system.

The "ESG card" has been created in the collateral registry system to collect and store environmentally relevant data, distinguishing between two types:
- Vehicle: passenger car, SUV, truck, bus, caravan, moped, motorcycle, agricultural machine/tractor, boat, airplane, other vehicle, trolleybus, tram, trailer/semi-trailer, and
- Other movable: solar power plant technology

The classification into vehicle-type risk categories is done automatically based on the characteristics of the asset (considering EURO motor standards), and the exposure of the movable collateral portfolio.

Stress test
ESRS E1 SBM-3

Climate change mitigation is a significant risk associated with OTP Group's lending activities, primarily as a transition risk, including expectations related to decarbonization.
The extent of this risk is estimated through stress testing of the corporate portfolio.
The transition risk related to climate change mitigation is partly linked to energy, as increasing energy efficiency and reducing the use of fossil fuels are necessary to mitigate climate change. The risk of adaptation to climate change associated with lending is a physical risk, and part of the transition risks (investments required for clients' adaptation) also fall into this category.
The Bank's 2023 group-level climate stress test (resilience analysis) examined climate-related (transition and physical) risks both in **a long-term strategic perspective and in the short-term** (not broken down by ESRS topics). Due to the different time dimensions, the climate stress test consists of two elements with different approaches. This assessment is presented to and approved by the Board of Directors as part of the annual ICAAP assessment.
As part of the Internal Capital Adequacy Assessment Process (ICAAP), ESG risks affecting the Banking Group are also assessed.
ESG risks refer to risks related to or arising from these factors, which may result from the Bank's investment, lending, and other activities. The Banking Group approaches ESG risks and factors holistically, integrating them into the risk management frameworks of the main risk types, meaning ESG risk is not treated as a separate risk type within the internal capital adequacy assessment process.
According to the Bank's assessment, risks arising from ESG factors within credit risk are not considered significant. The Group does not create additional capital requirements

for ESG risks under ICAAP; the management of ESG factors and related risks is carried out through different processes and controls. As part of the Internal Capital Adequacy Assessment Process (ICAAP), the Bank last conducted a climate change stress test in 2023. This test assesses the Group's short, medium, and long-term exposure to physical and transition risks related to climate change. This assessment covers credit risks related to the corporate portfolio, market risks related to the trading book, and operational risks related to short-term transition risks.

The stress test scenarios are prepared with different forecasting horizons.

a) Short-medium-term (next 3 years) forecast, focusing primarily on transition risk, and a strategic, long-term (until 2050) forecast covering both transition and physical risks.
b) The long-term, strategic analysis examines the potential impacts on the Banking Group along the three usual NGFS climate scenarios (orderly transition, disorderly transition, hot house) until 2050.

The Bank also examined exposure according to two risk types:

a) a transition risk
b) a physical risk.

The basis for comparison during the exposure assessment was the exposure of an "average bank operating in the Eurozone." The assessment was carried out by comparing various country-level indicators (for transition risk: the carbon intensity of the economies of the Bank's operating countries, for physical exposure: country-level risk ratings from various organizations).

The results showed that the countries within the Banking Group's operating area might be more exposed to transition risks compared to the Eurozone average, as their economies are more carbon-intensive (in terms of GHG emissions per unit of GDP) than the Eurozone average (although this difference is smaller when calculated at purchasing power parity, which eliminates distortions due to different price levels in countries).

For *physical risks,* the assessment showed that the general exposure of the countries within the Banking Group's operating area is not higher than the Eurozone average. Additionally, as part of the long-term analysis, we quantified the expected credit loss ratios along the three NGFS climate scenarios (orderly transition, disorderly transition, hot house) until 2050. The more precise estimates for the corporate loan portfolio were extrapolated[61] to the Banking Group's entire balance sheet, covering all OTP Group assets including the analysis of additional risks.

In this process, we projected the results of the European Central Bank's 2021 top-down banking system stress test (based on the NGFS scenarios used therein) onto the composition of the Banking Group's portfolio. These results showed that under scenarios assuming a successful carbon-neutral transition (orderly transition, disorderly transition), the Banking Group's lending losses may increase minimally – by a few bps – in the short-term, while under the "hot house" scenario, the increase in losses is more significant – but still manageable – in the period after 2040 (approximately +15 bps loss per year).

Additionally, the Banking Group's climate stress-test framework includes a **short-medium-term** (3-year horizon) corporate credit risk model, which specifically focuses on the transition risk of companies, as the long-term strategic analysis also indicated that the Banking Group's exposure to this risk type is higher compared to an average bank operating in the Eurozone.

This short-medium-term corporate credit risk model estimates the expected default rates of corporate borrowers in various sectors based on the country and sector-level gross value added (GVA) paths of the "short-term disorderly" scenario published in the ECB's 2022 bottom-up banking system stress test,[62] and later in the European Banking Authority's

[61] By extrapolation, we mean that we assume that the loss rate on the other assets of the Banking Group is equal to the loss rate on the corporate loan portfolio.
[62] 2022 SSM Climate Risk Stress Test, https://www.bankingsupervision.europa.eu/press/pr/date/2022/html/ssm.pr220127~bd20df4d3a.en.html

2023 stress test.[63] The model results show that corporate credit losses would remain manageable even under the assumed "short-term disorderly" scenario. This model does not include physical risks, as the general approach is that physical risks materialize in the long-term in negative climate scenarios, while transition risks are dominant in the short-medium-term. OTP Group has also integrated these models into its prudential stress test framework, which was examined by supervisory authorities – most recently during the 2024 SREP.

OTP Group does not create its own climate scenarios that consistently cover[64] all relevant macroeconomic and social indicators alongside climate parameters. OTP Group – similar to other credit institutions – uses the consistent scenarios of NGFS, IEA, ECB, and EBA, which include climate, commodity price, and macroeconomic parameters, along with the detailed assumptions provided by the issuing institutions.

The above analyses – conservatively – do not take into account that the Banking Group can also adapt to the circumstances, for example, by reducing its financing in vulnerable regions by 2050 in the long-term model. If these were considered, the additional losses would be even lower.

Credit Rating[65]

In line with regulatory expectations, the Bank has started developing risk modeling procedures related to climate change and environmental risks and integrating them into its current lending processes. To develop the bank model related to climate risks, a basic database relying on geospatial data was created, which helps determine the relationship between the financial data of companies financed by the Bank and climate risk data. To map potential data sources, acute and chronic physical risks significantly affecting Hungary were identified. After examining the data content and accessibility of various online data sources, the basic data of the ESG physical risk database were procured and processed. The mapping of additional material acute and chronic ESG risk factors will continue to expand at the group level.

The Bank primarily considers it justified to apply ESG aspects in the PD (Probability of Default) model. The Bank considers environmental risks within credit risk relevant by default, primarily concerning the exposure of collateral to acute or chronic physical hazards (e.g., property damage caused by weather events, water scarcity, and drought in agriculture), as well as potential new investment costs arising from transition risk.

Credit Rating System

Assessing physical risks involves significant technical challenges, including the need for detailed geographical data to determine the severity of potential weather events at different locations.

In line with regulatory expectations, the Bank started developing risk modeling procedures related to climate change and environmental risks and integrating them into current lending processes in 2023. Currently, the procedure has been developed and applied only for OTP Bank, and the method is continuously being expanded to other entities of the Banking Group.

The implementation of the developed ESG module into the customer rating system has been completed, thus ESG factors were considered in the rating of joint ventures by the regulatory deadline. Based on the developed physical risk module and the energy efficiency of residential collateral, the integration of ESG factors into mortgage loan assessment has begun.

To determine physical risk exposure, the Bank uses a simplified climate risk heat mapping method, which offers a quick and efficient way to map physical risks for entire portfolios by sectors, sub-sectors, and geographical areas. The determination of physical risk exposure depends on the following factors: Risk = f (Vulnerability [V], Hazard [H], Insurance [I]):

[63] https://www.eba.europa.eu/risk-and-data-analysis/risk-analysis/eu-wide-stress-testing/stress-test-2023
[64] In business practice, commonly accepted scenario-setting organizations such as the NGFS or the International Energy Agency (IEA), or even the European Central Bank or the European Banking Authority, do this.
[65] Action on climate change mitigation, adaptation and energy.

The vulnerability indicator varies by sector code: The vulnerability scores assigned to NACE codes can have values of:
a) very low
b) low
c) medium
d) high
e) very high
Vulnerability scores are determined for each identified physical risk, reflecting their relative impact on the affected sector.
The risk indicator varies by location unit:
a) low (4)
b) medium (3)
c) high (2)
d) very high (1)
hazard scores are assigned to each climate risk, reflecting their relative importance to the given location.

The score indicates the extent to which the given location is exposed to the given physical risk (the customer's location is determined using the collateral address, the company's site address, the company's headquarters address). The following risk indicators were used:

a) **Drought Index:** Over the past 10 years, Hungary has experienced severe droughts. For example, the 7-week period starting in mid-June 2022 was catastrophic for Eastern Hungary. It hardly rained for weeks, and the economic loss of the autumn harvest in the eastern part of the country was nearly total. Agriculture is the most vulnerable sector to drought, so the current assessment focuses on the agricultural sector. The Palfai Drought Index (PAI), developed in Hungary for users in agriculture and water management, has been used since the early 1980s to numerically characterize droughts. The Bank uses the modified Palfai Drought Index to identify the impact of drought risk.
b) **Flood Index:** Directive 2007/60/EC on the assessment and management of flood risks (commonly referred to as the Floods Directive or FD) mandates that all river basin districts identify areas where there is a significant potential flood risk or where such occurrences are likely. In Hungary, the flood risk concept defined in the Directive can be divided into three areas:
   - Flooding along unembanked watercourses
   - Flooding due to the failure or insufficient size of flood protection embankments
   - Flooding caused by precipitation and rising groundwater levels

   Flood risk data providers: The Hungarian government announced the second revised river basin management plan (VGT3) in April 2022. The preliminary vulnerability and risk assessment maps prepared during the
c) **Storm Index:** a storm is defined as an adverse weather phenomenon with a wind speed of at least 20 m/s. The storm risk index indicates the number of days in a year when the maximum wind gust speed reaches or exceeds 20 m/s.
d) **Frost Index:** Frost is categorized into spring, autumn, and winter frost.
   - Spring frost: At the risk location, a temperature of minus 2°C or lower measured at a height of two meters above ground level during the spring period
   - Autumn frost: At the risk location, a temperature of minus 2°C or lower measured at a height of two meters above ground level during the autumn period
   - Winter frost: At the risk location, a temperature of minus 15°C or lower measured at a height of two meters above ground level during the winter period

   The frost risk index indicates the number of days in a year when the minimum temperature does not exceed minus 2°C at two meters above ground level. Late spring frosts can have severe impacts on agriculture and forestry.

Relevant ESG risk factors for the development of the ESG Data System physical risk database:

	Temperature related	Wind related	Water-related	Surface cover related
Chronic	Changing temperature (air, freshwater, marine water)	Changing wind patterns	Changing precipitation patterns and types (rain, hail, snow/ice)	Coastal erosion
	Heat stress		Precipitation or hydrological variability	Soil degradation
	Temperature variability		Ocean acidification	Soil erosion
	Permafrost thawing		Saline intrusion	Solifluction
			Sea level rise	
			Water stress	
Acute	Heat wave	Cyclones, hurricanes, typhoons	Drought	Avalanche
	Cold wave/freeze	Storms (including snow, dust and sandstorms)	Heavy precipitation (rain, hail, snow/ice)	Landslide
	Wildfire	Tornado	Flooding	Subsidence
			Glacial lake outburst	

2.4.3 Managing operational risks

In terms of operational risk, severe weather conditions can affect business continuity, and there is reputational risk from failing to adapt to the continuously increasing regulatory and supervisory ESG requirements.
The management of ESG risks within the operational risk framework began in 2021 and remained unchanged in 2024. During the annual, group-level process-based risk and control self-assessments, respondents also evaluate the expected losses for the following year from an ESG relevance perspective, which is also included in scenario analyses. Quarterly monitoring is associated with the ESG operational risk tolerance value applied at the group level. We also monitor loss data from an ESG impact perspective, including ESG data quality aspects.

2.4.4 Managing Market Risks

In market risk management, sustainability risks are considered in accordance with the Green Recommendation. The risk management has established ESG rating-based position limits for trading and discretionary portfolios. For the latter, the Bank also applies an ESG exclusion list. The consideration of principal adverse impacts (PAI) in discretionary portfolio management (DPM) is done using MSCI standardized PAI statements, available from 1Q 2023. The standard report covers all identified indicators, except for fossil fuels and energy efficiency due to data gaps. Portfolio coverage shows an improving trend. Currently, the observation of principal adverse impacts is ongoing, with no associated limits or explicit policy. Weekly stress tests are conducted on the ESG risks of corporate bond portfolios in both the trading and banking books.

2.4.5 Liquidity Risks

Given its relevance, Integrated Risk Management has begun developing an integration methodology for assessing liquidity risks related to ESG risks.

2.4.6 ESG Risk Management at OTP Fund Management

At OTP Fund Management, ESG risk management is an integral part of the comprehensive risk management framework. The sustainability risk level of funds and portfolios is determined based on ratings[66] provided by MSCI ESG Research, ranging from CCC (worst) to AAA (best). When creating and rebalancing portfolios, the expected sustainability risk level is considered, and if the risk exceeds the expected level, measures are taken to reduce it.

[66] ESG ratings measure and evaluate a company's resilience to long-term, industry-relevant environmental, social, and governance (ESG) risks. The assessment is conducted in comparison with industry peers, and the ability to manage these risks is also taken into account in relation to exposure to industry-relevant ESG risks.

Funds with SFDR ratings must meet specific criteria, primarily regarding the minimum proportion of sustainable investments and the ESG rating of investments.
OTP Fund Management regularly prepares reports on sustainability risks, which are sent to portfolio managers and management, and quarterly summaries are presented to the Board of Directors. During investment decision-making, portfolio managers must ensure that the aggregate sustainability risk of their portfolios is in line with the expected level.
OTP Fund Management does not invest in companies involved in controversial weapon-related transactions or in government bonds of countries with authoritarian regimes, and it emphasizes the environmental impact of investments, including greenhouse gas intensity, waste and harmful substance emissions, and water usage.

3. Social Information

3.1 Own Workforce

The employees of OTP Group represent one of its most important values and a crucial building block of its success. Business goals can only be achieved with well-prepared and committed employees. OTP Group demonstrates a responsible employer attitude towards all its employees.

Material impacts, Risks and Opportunities ESRS S1 SBM-3

Regarding own workforce, the impacts always arise within the entire OTP Group's operations.

Material sub sub-topic	Type of impact, risk, opportunity	Description of impact, risk, opportunity
Working conditions		
Work-life balance	positive impact	The implementation of practices that consider work-life balance affects a large number of employees
	potential negative impact	The risk of practices that do not adequately consider employee interests
Health protection and safety	negative impact	In addition to typically non-hazardous jobs, stress emerges as a risk for a large portion of employees
Equal treatment and opportunities for all		
Gender equality and equal pay for work of equal value	positive impact	Due to the high proportion of female employees, the impact is significant; the pay ratio between men and women in the same positions differs only slightly at most member companies
	negative impact	The proportion of female leaders at higher management levels is consistently lower
Employment and inclusion of persons with disabilities	positive impact	The size of the corporate group and its wide customer base allow it to significantly impact the employment of people with disabilities
	negative impact	Currently, the employment rate of people with disabilities is low
Diversity	positive impact	The size of the corporate group allows it to significantly impact the implementation of diversity, and all forms of discrimination are prohibited
	negative impact	The practices of the Banking Group provide opportunities for development
Training and skill development	positive impact	Access to training is ensured, and regular performance evaluations are conducted at several subsidiaries
	potential negative impact	It may arise in practices that do not ensure equal opportunities
Measures against violence and harassment in the workplace	potential negative impact	The risk of abuse is high due to the size of the corporate group and the composition of its workforce

For a more details about the impacts, risks and opportunities, as well as their management, see @ESRS SMB-3 and the following sections of this chapter.

The topics gender equality and equal pay for work of equal value; diversity; employment and inclusion of persons with disabilities; being addressed together.
The workforce includes:

- employees and
- non-employee contracted workers,
- as well as individual entrepreneurs who have contracted with an OTP Group member company to perform specific work.

The significant impacts identified during the double materiality analysis cover all individuals within the workforce who may be significantly impacted by the Banking Group. The majority of the workforce at the Banking Group, 43,118 people, are employees working under full-time or part-time contracts. OTP Group's influence on external workers is more limited, as their working conditions and terms are not solely influenced by OTP Group. The Banking Group's practices focus on employees within the own workforce.
The significant or potentially significant impacts affect most employees, and no significant impact has been identified that is specific to certain countries/regions. The number of employees varies significantly by country, therefore the magnitude of the impact differs by country (see @ESRS S1-5).
The operations of the Group do not involve significant negative human rights aspects, such as the risk of child labor, forced labor, or compulsory labor. Additionally, there are no negative impacts on the workforce resulting from the implementation of transition plans aimed at reducing negative environmental impacts. The significant impacts identified for OTP Group's own workforce can be both positive and negative, depending on the Banking Group's practices. The Banking Group strives to achieve positive impacts while mitigating or avoiding negative impacts.

Identifiable negative impacts,[67] such as health and safety risks and workplace violence and harassment risks, primarily occur in individual cases, while stress risk affects a broader range of employees.
We aim to achieve positive impacts in work-life balance, gender equality and equal pay for equal work, training and skills development, and the diversity and the employment of people with disabilities. Activities aimed at achieving positive impacts do not differ based on employees' contractual relationships, although most measures have a well-identified target group (e.g., women, people with disabilities). Positive impacts vary by country, depending on which area or activity a particular group member places greater emphasis on.
To protect vulnerable groups (gender, ethnicity, religion, age, disability, family status), a group-level policy (Code of Ethics) is in place, which includes the prohibition against discrimination and measures against workplace violence and harassment, applicable to the entire workforce.
OTP Group members identify and manage health and safety impacts differently, in compliance with local regulatory requirements. Most companies conduct regular risk assessments to ensure a safe working environment. At the group level, employees of companies engaged in agricultural activities work in higher-risk roles (typically involving animals and machinery).

Policies related to own workforce ESRS S1-1

Code of Ethics

Key content: The comprehensive policy for OTP Group's own workforce is the Code of Ethics of OTP Bank Plc. and OTP Group (presented in the @4.1 Corporate Governance disclosure requirement). OTP Group's Code of Ethics expects respect for human rights, emphasizes equal treatment, workplace safety, principles for preventing harassment, and fair employment. It recognizes OTP Group's responsibility to respect human rights. OTP Group supports

[67] In the materiality assessment, we identified that most impacts can be both positive and negative. The negative impact mentioned above should be understood as focusing on avoiding negative impacts in these topics, while the goal for other topics is to achieve positive impacts.

open dialogue and provides opportunities for feedback.

The Code of Ethics explicitly includes the goal of eliminating discrimination – including harassment – and promoting equal opportunities, as well as diversity and inclusion. It specifies the following forms of discrimination: based on ethnicity, skin color, gender, sexual orientation, gender identity, disability, age, religion, political opinion, national origin, and other forms of discrimination covered by EU regulations and national law.

External Expectations Related to Material Topics for Own Workforce: Related external expectations on relevant topics related to our own workforce: expectations on human rights and labour standards were guided by international guidelines, the UN Guiding Principles on Business and Human Rights (UNGP). The Code is harmonised with the sections on human rights and labour principles of the UN Global Compact, as well as with the human rights chapter of the OECD Guidelines for Multinational Enterprises, and with the core conventions of the International Labour Organisation (ILO), including on freedom of association, collective bargaining rights, equal pay and protection against discrimination in the workplace.

Policies outside the Code of Ethics are described in each sub-chapter, by topic.

Processes for engaging with own workforce

ESRS S1–2

Within OTP Group, engagement with the workforce and employee representatives occurs through multiple channels, always complying with legal requirements.

Employee Engagement Survey

OTP Group annually conducts a commitment survey, which is the most comprehensive and wide-ranging tool for employee feedback and expression. All employees of the member companies[68] are invited to take part. In the 2024 commitment survey, 91% of the invited employees, totaling 31,134 individuals, responded at the group level. The response rate exceeded 80% in all countries except Slovenia. The Uzbek Ipoteka Bank participated in the survey for the first time. More about the survey @ESRS S1-5.

Employees provide anonymous feedback through a dedicated platform on issues related to compensation, work organization, and human capital development. Based on the results of the survey at the organizational unit level, unit leaders develop an annual action plan in collaboration with the employees.

The operational responsibility for the employee survey lies with the Managing Director of the Human and Organizational Development Directorate of OTP Bank, ensuring appropriate involvement of stakeholders in the process and supporting the company's management in the evaluation of survey results.

The Banking Group communicates the results of the survey and action planning, as well as the implemented actions through internal channels (the most commonly used platforms are the corporate intranet, internal newsletters, and employee forums and meetings). The results are presented to the management in Presidential, Divisional, and Regional reports, as well as in the Executive Steering Committee report.

The engagement survey database allows for the analysis of the positive and negative impacts of employment by different employee demographic groups.

At the group level, the effectiveness of collaboration with employees is measured through the engagement survey: by employee participation rate, the nominal and relative values of key engagement indicators, employee evaluations of the previous year's action plans, the year-over-year changes in commitment metrics, and comparison to global benchmark values in the financial sector.

[68] At the group level, the vast majority of employees receive an invitation. In terms of size, agricultural companies, which are not negligible in size at the group level, do not participate in it. Domestic subsidiaries involved in the survey: CIL Babér Ltd., BookYourDoctor Online Ltd., Real Estate Investment Fund Management Ltd., Merkantil Bank Ltd., Merkantil Leasing Ltd., OTP Fund Management Plc., OTP Ecosystem Ltd., OTP Life Annuity Plc., OTP Factoring Ltd., OTP Hungaro Project Ltd., OTP Real Estate Ltd., OTP Real Estate Lease Ltd., OTP Ingatlanpont Ltd., OTP Mortgage Bank Ltd., OTP Card Factory Ltd., OTP Building Society Ltd., OTP Mobil Service LLC, OTP Home Solutions Ltd., OTP Funds Servicing and Consulting Ltd., OTP Financial Point Ltd., OTP PortfoLion Ltd., OTP Travel Ltd.

Consultation

Most of OTP Group's subsidiaries[69] have trade unions, with which the head of human resources regularly consults on employee-related issues. OTP Group has not entered into a global framework agreement with employee representatives regarding the respect for human rights of its workforce.

Processes to remediate negative impacts and channels for own workforce to raise concerns

ESRS S1-3, S1-17

OTP Group companies utilize various mechanisms to provide opportunities for both employees and external workers to voice their complaints and grievances. These mechanisms include anonymous options to ensure that employees can use these channels with confidence. The ethical reporting system is available to the entire workforce (see @Business Conduct). Trade unions also play an important role in raising employee concerns and addressing potential negative impacts, as well as providing information (@S1-2). Additionally, several countries have occupational safety representatives. Besides the internal channels provided by the Banking Group, employees also have legal options available, depending on local institutional frameworks, allowing them to initiate proceedings directly by approaching the courts, which we consider a suitable channel for raising concerns.[70]

Employee complaints are handled in accordance with the procedures and time limits set out in the law and in the ethics and internal labour regulation documents. Employees may lodge a complaint regarding the protection of their rights in accordance with the Code of Ethics and, where applicable, the internal labour regulations and collective agreements, which are accessible and available to all employees.

Nearly 17% of OTP Group's ethical reports were submitted by its own employees, namely 106.[71] No monetary compensation was initiated in any case. Within OTP Group, there were no discrimination reports or justified discrimination cases involving its own workforce. No complaints regarding discrimination against OTP Group's own employees were submitted to the national contact points considering the OECD guidelines for multinational enterprises. Two complaints were submitted to the trade union, which were resolved without monetary compensation. No internal occupational safety complaints were received during the reporting year.

A total of 57 labor proceedings were initiated against OTP Group companies in the reporting year. During the year, 17 proceedings from 2024 and 20 from previous years were concluded. 15 labor lawsuits resulted in payment of fines. The compensation amount was HUF 235 million, a significant part of which was a fine paid due to practices from previous periods (HUF 226 million).

A total of 166 complaints were received through the above-mentioned channels.

Targets

ESRS S1-5

The group-level engagement survey is the primary tool used by OTP Group to comprehensively measure, evaluate, and monitor progress in all areas related to its employees, including the material topics identified within the framework of the double materiality analysis[72]. The objective related to the level of **engagement** represents OTP Group's overall goal for its employees and the topics affecting them. OTP Group's practices contribute directly to increasing engagement, so this goal covers all the important issues related to employee well-being.

[69] OTP Bank Plc., OTP Financial Point Ltd., OTP PortfoLion Ltd., OTP Travel Ltd., DSK Bank, OTP banka d. d. (Croatia), OTP banka Srbija a.d. (Serbia), Crnogorska komercijalna banka a.d. (Montenegro), Ipoteka Bank.

[70] The occupational safety authority and labor inspection institutions can also function as complaint mechanisms; however, their primary role is regulatory, so we list their procedures in the Governance chapter in relation to legal compliance (GRI 2-27).

[71] The identification of the reporter cannot be precise due to the possibility of anonymity.

[72] The themes identified in the ESRS are not mentioned by name in the survey or in the objectives, and OTP Group does not disaggregate the survey subcomponents into ESRS themes.

Engagement is an extremely complex indicator[73], as it depends on numerous factors that affect employee satisfaction, well-being, and long-term commitment to the company.

One of the key indicators of OTP Group's engagement model is the engagement score. It is an output score that cannot be directly improved. The elements of the survey, the drivers, are specific experiences (e.g. community building, empowerment, recognition etc.) through which an organization can positively or negatively influence engagement.

The drivers of the engagement survey are statements with which agreement is measured on a 5-point scale. Engagement is a complex indicator that reflects the average proportion of positive responses to the statements included.

OTP Group aims to continuously increase employee engagement and to achieve the 75th percentile of the financial sector benchmark and the global 75th percentile at Group level. The financial sector target was 75% and the global target was 78% in 2024. OTP Group's engagement level reached 77% compared to 2023, an increase of 5 percentage points, exceeding the financial sector benchmark.

There has been a positive shift in all engagement topics (so-called drivers). The indicator has moved in a positive direction in most countries (Slovenia and Russia being exceptions). The most significant improvements, exceeding 5 percentage points, occurred in Bulgaria, Montenegro, and Serbia.

The goal is a relative target, comparing the Group's performance with other large companies and global benchmarks[74]. The Group measures the achievement of this goal on an annual basis. The survey is conducted every October, with the results being available at the end of November.

Annual action plans are developed based on the survey results, resulting in the implementation of measures during the execution phase. The action plan and its follow-up serve as effectiveness measurement indicators.

The survey covers the operations of OTP Group in 11 countries, encompassing the vast majority of employees (see @S1-2). In terms of its content, the survey includes all factors affecting employee engagement, covering topics such as:

- Workplace Atmosphere: Respectful treatment, trust in direct supervisors, open and honest communication, freedom of expression, openness to ideas and opinions, importance of employee well-being to senior management and the organization, work-life balance
- Performance Initiatives: Recognition for good work/performance-based rewards, constructive feedback on work performance, responsibility for one's performance, clear distinction between roles, understandable expectations, appropriate professional knowledge, learning/development opportunities, good career prospects, attracting excellent professionals
- Work Environment: Appropriate authorizations, access to resources and information, sustainable workload, helpful direct supervisor, cooperation within and between teams, effective decision-making processes, workplace safety, and health protection

The survey is conducted based on international methodology, ensuring the tracking of trends of results through the provided structure and questionnaire. External and internal benchmarks are used in data analysis to contextualize and evaluate results. The external benchmark is based on responses from over 700 companies, with the financial industry benchmark comprising 121 companies from the bank sector. The global 75th percentile benchmark represents the top quartile of responses to all questions.

The survey preparation tasks were carried out in international working group collaboration within OTP Group, with each country contributing to the content and methodological development of the survey. In 2024, the company made minor technical adjustments based on working group feedback.

[73] Qualtrics Employee Engagement

[74] The external benchmark result is based on more than 20 million responses from over 750 companies, at least 20% of which are part of the Fortune 500. The financial sector benchmark includes 121 companies with 3.3 million responses. The global 75th percentile represents the upper quartile based on all responses.

The non-target objectives related to the engagement measurement, if any, are described in each sub-chapter, by topic.

Taking action on material impacts on own workforce
ESRS S1-4

At the group level, the employee engagement survey (see @S1-5) serves as the basis for annual action planning, process improvement, and the implementation of further measures and programs. Despite improving values, the group-level development focus remained on **ensuring career opportunities,** developing and simplifying processes that **ensure employee well-being,** and **senior management involvement** in employee dialogue in 2024. The key measures are presented by topic in the following subsections (@S1-4).
OTP Group's guidelines, objectives, and practices outlined in the Code of Ethics emphasize not causing or contributing to significant negative impacts (see @S1 SBM-3).
The management of impacts affecting employees is carried out by the HR departments of each group member – their headcount depending on the organization's size. The legal and compliance department support the handling of complaints, investigation of ethical reports, ensuring legal compliance, and the compliance department is responsible for measures against workplace violence and harassment. OTP Group aims to employ an adequate number of internal human resources with experience and expertise in these areas and external experts are engaged if necessary. The adequacy of resources is indirectly characterized by the results of employee engagement surveys, employee complaints, and legal compliance. Improvement in engagement is observed, and the number of employee complaints is not considered high relative to the number of employees.

Characteristics of Employees
ESRS S1-6

At the group level, the number of active employees decreased from 44,468 to 43,118. This change is primarily explained by the sale of the Romanian subsidiary. The distribution by age and gender changed minimally compared to the previous year: the ratio of women to men among active employees changed from 66% to 65%. The distribution of employees by country is presented in the @SBM-1 disclosure requirement.

OTP Group Employee headcount, persons, as of 31 December:

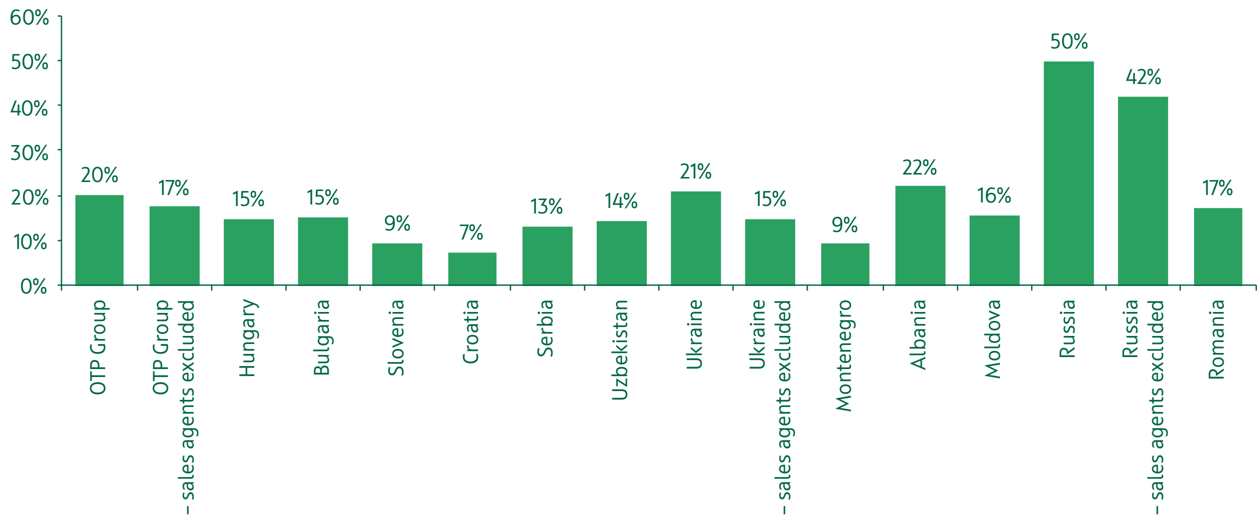
(fő, december 31.)	2023			2024		
	Total	Men	Women	Total	Men	Women
Employees, total	**44,468**	**14,986**	**29,482**	**43,118**	**15,293**	**27,825**
Full time employees	42,236	14,565	27,671	40,984	14,887	26,097
Part-time employees	2,232	421	1,811	2,134	406	1,728
Permanent employees (employees with indefinite-term contracts)	43,096	14,740	28,356	41,827	14,980	26,847
Temporary employees (employees with fixed-term contracts)	1,372	246	1,126	1,291	313	978

There were no employees with non-guaranteed working hours at the end of 2024.

Employee turnover, 2024	OTP Group
Turnover rate (%)	**20.03%**
Employees left (prs)	**8,918**
Percentage of employees leaving – compared to the total by categories	
male	17.57%
female	21.35%
under 30 years	39.91%
between 30-50 years	16.28%
over 50 years	12.89%

Employee turnover, 2024

ratio of employees leaving compared to the closing number (persons) by country



In Russia and Ukraine, there is typically a high turnover rate among sales agents, so we also present the ratios excluding the employed agents.

3.1.1 Gender Equality and Diversity[75]

Policy
ESRS S1-1

Beyond the Code of Ethics, the following policies regulate the issue of diversity:

Strategy for Gender Equality

Key content: In 2021, OTP Bank developed a strategy to promote gender equality, aiming to ensure equal opportunities for women. The Bank has set strategic goals to ensure equal opportunities for all employee groups, creating an open and inclusive workplace free from discrimination and disadvantage, and supporting a diverse, professionally outstanding, and collaborative work culture.
Scope: The strategy applies to OTP Bank.
Accountable for the implementation: In ethical matters, the compliance managing director, who reports directly to the President-CEO, is responsible and reports to the Ethics Committee.
Availability: The strategy is publicly available on the Bank's @website and accessible online on internal platforms for stakeholders.
Reference to third-party standards: The strategy complies with the relevant Hungarian legal requirements (Act CCXXXVII of 2013 [Hpt.] Section 112 [3] f]), as well as the recommendations of the Hungarian National Bank and the European Banking Authority's EBA-GL-2017-12 guidelines. The handling of complaints related to discrimination is included in the @S1-3 disclosure.
OTP Bank regularly analyses key indicators for talent attraction and employee development opportunities, with a focus on building a group-level leadership community and developing key skills to build international professional knowledge and community.

Subsidiary Policies

Some subsidiaries also have diversity policies that prohibit workplace discrimination and support equal opportunities. Due to space constraints, we present the main content, application scope, and responsible parties for these policies.
Key content, scope and accountable for the implementation: In Bulgaria, DSK Bank renewed its "Diversity, Inclusion, and Belonging" policy in 2024. The policy emphasizes gender

[75] We present the practices related to the sub-subtopics of 'Gender Equality and Equal Pay for Equal Work,' 'Diversity' and 'Employment of Persons with Disabilities' in a consolidated manner.

equality and equal pay for equal work. The Head of Human Resources and Transformation Division is responsible for the policy. A dedicated team supports the implementation of the policy. A specific methodology has been developed for continuous monitoring and review of these topics. Regular reviews are conducted based on real data, involving senior management, and the topic is a regular agenda point at the Nomination and Remuneration Committee and the Supervisory Board of the bank.

Key content, scope and accountable for the implementation: In Slovenia, the subsidiary's Diversity, Inclusion, Equality, and Belonging (DIEB) policy declares the bank's commitment to these topics. The Head of Human Resources is responsible for the implementation of the policy. The policy aims to enforce the principle of a discrimination-free and harassment-free workplace for all employees and throughout the employee lifecycle, recognizing individual differences. The document requires the definition of plans and measures, as well as leadership responsibility for maintaining a diverse corporate culture. It also defines engagement measurement indicators (KPIs) to track diversity goals on an annual, quarterly, or monthly basis.

Key content, scope and accountable for the implementation: The Croatian subsidiary's Diversity and Inclusion Policy aims to create a discrimination-free, open, and inclusive workplace and support a diverse, professionally outstanding, and collaborative work culture. The document applies to all employees. The implementation of the policy is supported by specific action plans and training, with a dedicated responsibility for compliance with internal rules and international standards, referencing the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The highest level of responsibility for the policy's implementation lies with the CEO.

Taking action on Gender Equality and Diversity
ESRS S1-4

The principles of the Code of Ethics are incorporated into internal regulations in various ways. Generally, the internal regulations of OTP Group members stipulate that positions must be filled and performed according to specific conditions related to the type and level of qualifications, work experience, and other criteria, in accordance with the complexity, responsibility, and specific description of the positions, without any discrimination.
It is considered good practice in Slovenia that ensuring diversity and equal opportunities is enshrined not only in the corporate charter and the Code of Ethics but also in policies related to the selection of executive board members, as well as in regulations aimed at preventing workplace discrimination, mobbing, and other forms of psychosocial risks. Most group members continuously implement measures to promote equal opportunities and diversity. The introduced measures are typically monitored, but criteria for effectiveness are not always defined. Here are some programs, without claiming completeness:

In 2024, OTP Bank launched new diversity programs:

- The international Women Network program is implemented with the involvement of subsidiary banks, preparing and encouraging women for higher-level leadership roles. Additionally, a series of webinars for female leaders and a mentoring program aim to support the career development of the most talented female leaders.
- The launch of OTP Digital GirlPower Program supports the employment of women in digital and IT fields through a dedicated talent pipeline program.
- To eliminate unconscious prejudice, diversity-supporting, awareness-raising training materials are being prepared for leaders and employees on gender equality and diversity topics. The "Openness and Inclusion" digital training material, which covers all

employees, also serves as a foundation for future inclusive leadership development programs.

At DSK Bank, the issues of diversity and equal opportunities are managed by the dedicated Culture & Change team since 2024. The team has set clear and forward-looking goals. The bank has reviewed the methodology for measuring gender pay gaps; regular KPI reporting and senior management meetings were established to monitor diversity and inclusion topics. Detailed internal rules and procedures are being developed to monitor diversity and pay gaps. A dedicated procedure is being developed for returning from maternity/paternity leave, supported by the LaDySK community for easier reintegration. The goals of the LaDySK community, composed of female leaders, have been redefined to increase the chances of women being among the potential candidates for B-1[76] level positions. The community has a clear activity plan and a coordinator team to support development.

In accordance with the Gender Equality Act, OTP Bank Serbia has defined a package of measures focusing on six topics. The measures address:

- equal access to information within the bank
- addressing gender differences in health insurance, e.g., additional benefits for pregnant women and newborns
- promoting gender equality by giving preference to male candidates, while ensuring non-discrimination
- maintaining balanced gender ratios in top management
- using gender-sensitive language to influence the elimination of stereotypes relating to specific genders
- disaggregation of relevant data by gender and submitting it to the competent institutions.

The subsidiary measures the effectiveness of its actions, including the number or absence of court cases related to gender equality and based on employee feedback received in this regard.
The Uzbek subsidiary has established a separate reporting line within the HR Directorate for employees to report potential violations of equal opportunities, in addition to the ethical reporting line.
The Russian subsidiary, in line with legal requirements, has introduced regulations and quotas for employing people with disabilities. The quota is determined based on the proportion of the workforce.
The Ukrainian subsidiary has made a separate e-learning course available on the topic of interactions with people with disabilities.

Targets Related to Gender Equality and Diversity
ESRS S1-5

OTP Bank set measurable goals in 2021 in the so-called "Strategy for Achieving Gender Equality" document (without a specified timeframe). The goal is to have at least one female member on the Board of Directors and the Supervisory Board. The Bank also considers the legal requirement that members of the governing bodies must have appropriate knowledge, skills, and experience, which remain the primary and essential criteria for selecting suitable candidates. The goal was established considering relevant Hungarian and European Union recommendations[77]. Since 2021, the Board of Directors has had one female member. Succession planning for leadership positions is consciously designed and monitored at various leadership levels. In order to ensure an adequate number of internally promotable female candidates in the company's leading roles, OTP Group's leadership succession practice set a target of at least a 30% female candidate ratio in 2024.
The goal of the Uzbek subsidiary is to maintain the current level of employee satisfaction (84) and to have no discrimination complaints. The achievement of this goal is measured through internal surveys and feedback systems.

[76] DSK Bank senior management.
[77] Including the recommendation No. 11/2019 (V. 6.) of the Hungarian National Bank and the guideline No. EBA-GL2017-12 of the European Banking Authority.

Diversity metrics
ESRS S1-9, S1-12

Gender distribution of senior management:

OTP Group 31/12/2024	Man	Female
Number of senior manager (person)	66	16
Proportion of senior managers (%)	80.49%	19.51%

Age distribution of employees:

31/12/2024, %	OTP Group
under 30 years	18.68%
between 30–50 years	60.70%
over 50 years	20.62%

Within OTP Group, the proportion of employees with disabilities is 1.23% (531 people). In Hungary and most subsidiaries, the collection of data on the number of people with disabilities is not legally restricted.[78] DSK Bank employs the most people with disabilities, their number is 186. Local laws define who qualifies as a person with a disability and member companies use these definitions.

Remuneration metrics (pay gap and total compensation)
ESRS S1-16

The average pay gap between female and male employees in OTP Group, expressed as a percentage of the average pay level of male employees, is 34,83%. This difference is due to the fact that men and women typically hold different positions, with a higher proportion of men being in higher-paid positions.
In OTP Group the ratio of the total annual compensation of the highest-paid individual to the median total annual compensation of all employees (excluding the highest-paid individual) is 172.

3.1.2 Training and skill development

Training and development activities are directly linked to corporate strategies to ensure alignment with both employee needs and organizational objectives. The aim of training programs is to develop employees' professional competencies, contributing to the group's competitiveness and compliance with regulatory requirements. Additionally, training supports the enhancement of employee engagement, which is crucial for increasing overall organizational efficiency.
Access to skill development is described in @S1-4.

Taking actions on training and skill development
ESRS S1-4

OTP Group offers a wide range of training and development programs (from leadership and professional programs, soft and hard skills training, external training and conferences, to individual and group online courses)[79] to support the professional growth of employees. Group members adapt to local needs based on their own requirements and situations, so each organization develops the skills and knowledge of its employees according to its own priorities. OTP Bank formulates training recommendations at the group level, the implementation of which varies by country due to different legal and regulatory environments and other local conditions.
All employees of the Group receive training, and every employee has the right to continuously develop their knowledge and skills

[78] For Serbia, Russia, and Uzbekistan information is not available.
[79] We consider this continuously implemented training program package as an action.

in line with business and personal development priorities. Mandatory trainings are typically designed through a planning process. These plans combine mandatory training required by legal regulations with the development of employees' professional competencies. Training plans are developed with employee involvement, and where performance evaluations exist, their results are taken into account. Subsidiary banks have the opportunity to utilize the parent bank's e-learning trainings, the organization, execution, and feedback of which are the responsibility of the subsidiaries.

The completion of training sessions is monitored by Group Members, primarily by the employee's supervisor and the training area specialist and draw the attention of the employee's manager if training has not been completed. Records are provided by the training framework.

The training budget is planned annually as part of the global annual budgeting process. The training budget is prepared in line with identified training needs, business strategies, and priorities. In 2024, OTP Bank's total financial expenditure for direct training and development purposes (including all trainings) amounted to approximately HUF 2 billion. This represents approximately 1% of PEREX (personnel expenses), which aligns with industry best practices according to international corporate benchmarks.

A good practice in relation to training planning is the Slovenian subsidiary's talent management principle, which considers every employee as talent. The subsidiary categorizes its programs into three groups: leadership development programs, expert development programs, and general development programs. Leadership development has received significant emphasis in recent years, and OTP Bank plans to implement a series of workshops for them in the coming year as well. Leaders have their own training budget, which they can primarily use for the professional development of employees. The development programs available to all employees focus on well-being and personal growth (e.g. motivation and optimism, life in the digital world).

In Ukraine, training goals and plans are developed through an extensive consultation process involving employees to ensure that their expectations align with the subsidiary bank's strategy. The aim is to train at least 80% of employees, thereby supporting their professional development, job satisfaction, and long-term commitment to the company.

Group members implement numerous improvements in the scope of training or training organization year after year. Below are some examples of developments introduced by group members in 2024, without aiming for completeness:

At the group level, international talent management programs have been implemented as part of the OTP Academy framework. Professional academies include IT Academy, Agile Academy, Chapter Leader Academy, and Retail Academies.

Specifically related to ESG, the Risk Academy Foundation's ESG Module, an English-language training course available to everyone, was completed by more than 1,000 colleagues working in risk management across the group.

To enhance environmental awareness, OTP Bank piloted a 3-month awareness program called GreenStorm, with about 40 participants.

OTP Bank has made skill development training available in three main areas based on the previously introduced leadership role model, covering the topics of change, performance, and engagement. Skill development training was organized for employees based on requests received from various departments and the most important market trends. Both leaders and employees could choose from the available trainings based on training discussions held with their respective evaluative leaders.

In Serbia, the Skill4U educational program has been introduced for all employees, allowing them to select the most suitable educational materials and development trainings through the House of Benefits online platform. The program helps to reduce skill gaps, increases engagement, supports career development, and enhances employee satisfaction

and well-being, while also contributing to the company's talent development and organizational agility goals.
CKB planned extensive leadership training for directors as part of a corporate culture change project.
The Ukrainian subsidiary developed a new competency matrix focusing on gaining soft and hard skills to facilitate the development of business-critical skills. A new feedback platform has been introduced, allowing employees to provide feedback in regards to the training programs.
In Russia, a comprehensive Learning & Development strategy was adopted at the end of 2023 to modernize and improve the bank's learning and development processes. This includes updating training programs, improving processes and technologies, increasing automation, developing a feedback culture, and involving additional resources. The strategy was implemented in 2024. Key indicators, for which target values were defined, measure employee engagement, retention (turnover), the effectiveness of internal training programs, and leadership evaluations.
NAGISZ Ltd. and Nádudvari Élelmiszer Ltd. focused on developing the competencies and leadership skills of managers throughout the year.
Performance goals and development goals are set within the annual performance management process, tailored to individual development needs necessary for doing the specific work or even develop further.
Performance evaluation, including the assessment of goals and competency/value-based behaviour, is conducted within the evaluation process. Group members evaluate the performance of the employees in different ways.
At OTP Bank, evaluations are conducted twice a year, while in agile areas, this process is divided into quarterly cycles.
At subsidiaries, the employees working at the head office undergo at least annual performance evaluations, while the employees in branch network participate in quarterly performance evaluations based on goal agreements. These evaluation systems focus on achieving individual and organizational goals, competencies, and feedback methods. In 2024, Ipoteka Bank conducted only KPI evaluations and plans to introduce performance and career development evaluations in 2025.

Targets related to training and skills development
ESRS S1-5

OTP Group members set numerous subsidiary-specific goals in the area of training and skills development, such as the implementation of training plans, achieving goals set in competency matrices, and indirectly related to satisfaction and engagement. Due to their diversity and lesser significance at the group level, we refrain from detailing these goals.

Training and skills development metrics
ESRS S1-13

Annual training per employee, number of hours, 2024:

	OTP Group
Senior manager	110
Middle manager	80
Employee	31
Men	27
Women	41
Average 2024	**36**
Average 2023	34

Employees receiving regular performance and career development reviews, %, 2024:

	OTP Group
Proportion of senior managers	89.65%
Proportion of middle managers	87.90%
Proportion of employees	68.96%
Proportion of men	66.35%
Proportion of women	72.26%
Proportion of total	**70.91%**

3.1.3 Health and safety in the workplace

OTP Group strives to maintain safe working conditions and preserve the health and safety of its employees.

Policies
ESRS S1-1

The occupational safety regulations of the subsidiaries are considered as policies related to workplace health and safety, which are always prepared in compliance with local laws to ensure legal compliance. These regulations are independently prepared by group members, and we refrain from presenting them individually due to their lesser significance.
Key content: OTP Bank Occupational Safety Regulation is a comprehensive occupational safety prevention strategy aimed at implementing the requirements for safe and healthy working conditions in accordance with the Occupational Safety Act. The regulation uniformly defines the responsibilities for occupational safety tasks across the entire workplace and regulates the processes for performing specific occupational safety tasks. Subsidiary regulations also focus on creating and maintaining safe working conditions.
Accountable for the implementation: The relevant regulation of OTP Bank was adopted by the CEO. The responsible manager for occupational safety activities at the Bank is the head of the CEO's Cabinet. As group members, CEOs are responsible for adopting the policy, supported by the heads of operations and local occupational safety officers in implementation.
Ensuring availability: Occupational safety regulations are available in internal regulatory repositories.
Reference to external requirements: The framework for occupational safety is provided by local legal requirements.

Actions on health and safety
ESRS S1-4

OTP Group operates workplace health and safety programs to maintain a safe and healthy work environment. These programs include targeted activities to prevent accidents, minimize workplace risks, and protect the physical and mental health of employees, including risk analysis, occupational safety training, and the physical design of a safe workplace. These activities[80] are being routinely operated within the group, with minor annual developments due to changes in legal requirements or independent initiatives by subsidiaries. OTP Group employees primarily work in low-risk positions from an occupational safety perspective, and the framework for occupational safety is regulated in accordance with legal requirements, with activities implemented accordingly.
The effectiveness of occupational safety and occupational health processes is monitored and evaluated in various ways by subsidiaries. Internal audits support compliance with health and safety regulations, and feedback from stakeholders, especially from employees, plays a significant role in evaluating initiatives. At companies with works councils, regular consultations are held with institutionalized employee representatives on occupational safety issues.

[80] We do not consider these as measures according to the ESRS; however, it is important to describe the existence of these practices for context.

Considered as a good practice, OTP Bank investigates near-miss incidents in addition to accidents and shares lessons learned and best practices with affected employees through extraordinary training.

In Russia, an audited occupational health and safety management system is operated based on legal requirements, recognized standards, and recommendations. The management system includes regular briefings, training, and periodic checks of occupational safety knowledge for stakeholders. Preventive and periodic medical examinations, including psychiatric evaluations, are organized, as well as daily pre- and post-travel health checks for employees with transportation-related duties. These measures cover all facilities and employees.

Key measures include ensuring a safe and healthy work environment; operating and auditing the occupational health and safety management system; regular briefings, training, and education on occupational safety knowledge; providing voluntary health insurance for employees; organizing pre- and periodic medical examinations, including psychiatric evaluations; and conducting pre- and post-travel health checks.

In the context of workplace health and safety, measures include health promotion and preservation programs, as well as stress management programs, which are presented below. The scope of key measures covers every country and applies to all employees, with any deviations noted separately. The timeframe for implementing key measures varies by country and depends significantly on the type of measure.

Health preservation

It is a general, ongoing practice within the group to conduct regular **preventive health examinations** for employees[81].

OTP Bank provides occupational health examinations for all positions, even though it is not a legal requirement. Pre-employment and periodic medical examinations are conducted according to the schedule set by health authorities. Within the framework of OTP Bank's occupational health services, 9,540 examinations were conducted by the end of September. The examinations are tailored to the specifics of the job. Office and customer service employees undergo basic examinations, while those in higher-risk positions also undergo specialized examinations.

The Bank and its 24 domestic subsidiaries[82] provide high-quality health insurance services for employees. As a result, 6,835 participated in screening examinations or received care for complaints one or more times during the year. Among them, 4,577 employees utilized the annual screening package, which we consider positive in terms of prevention and health awareness. By the end of 2024, HAGE, NAGISZ Ltd., and Nádudvari Élelmiszer Ltd. introduced employer health insurance offering health insurance services and sum insurance for senior employees.

The parent bank and subsidiaries offer various welfare programs for employees. These typically include lectures, webinars, workshops, health days, screenings, and vaccinations. The programs are diverse, varying by company, and primarily focus on health promotion, mental and physical health, and stress management, and are continuously available to all employees.

The Slovenian subsidiary places a strong emphasis on health promotion. In 2024 it continued the previously established practice of active breaks, encouraging refreshing office exercises, and holding health promotion webinars. To earn the "Heart-Friendly Bank" title, they implemented a safety and resuscitation workshop, among other initiatives.

Stress management

OTP Bank conducted a renewed psychosocial risk assessment in 2024 to promote mental well-being, examining health status, stress, and workload anonymously. 12% of employees participated in the survey, and the results served as the basis for further health programs.

[81] Ipoteka Bank has initiated the development of Voluntary Health Insurance (VHI) and the PUSH30 programme to promote healthy lifestyles among employees, in addition to compulsory insurance and health screening.

[82] In addition to mandatory insurance and health screenings, Ipoteka Bank has initiated the development of voluntary health insurance (VHI) and the PUSH30 program to promote a healthy lifestyle among employees.

To manage workplace stress, the Bank operates a program with supportive conversations: providing mental health professionals, psychologists, and coaches to support employees in difficult, mentally demanding situations. This service is available to all employees free of charge and is provided by an external partner (otp.meghallgatunk.online). The conversations follow the guidelines of the International Coach Federation (ICF) and mental health frameworks, and the confidentiality of the conversation is ensured. The service is increasingly used by employees year after year, with over 1,000 conversations held in 2024. Employee skill development training (e.g., mindfulness, stress management, effective assertive communication) is available twice a year for Bank employees. Training is organized based on demand, with an average of 350 employees participating in these sessions each semester.

Among Hungarian companies, NAGISZ Ltd. and Nádudvari Élelmiszer Ltd. launched training projects for managers in 2024 to learn stress and life management, and energizing techniques. Participants received personalized support through individual coaching.

In Montenegro, as part of the CKB Open Training program, employees had the opportunity to participate in training on flexibility and stress management, effective time management, and conflict resolution. As part of the CKB Wellbeing program, lectures were organized for employees on topics such as improving sleep quality, tips and strategies for overcoming physical and mental obstacles, and a lecture on the world of extraordinary responsibility from the perspective of a heart surgeon.

Targets Related to Workplace Health and Safety
ESRS S1-5

OTP Group strives to maintain safe working conditions. The low number and severity of accidents demonstrate the effectiveness of these efforts. OTP Group monitors and reports workplace accidents and injuries. Three subsidiaries have set measurable goals specifically related to workplace health and safety. For goal achievement, see @ESRS S1-14 Health and Safety Metrics disclosure.

- In Serbia, the goal is to reduce the number of workplace injuries in 2025 compared to 2024. The goal applies to the entire bank and all workplaces, with a focus on reducing injuries at bank premises. In 2024, there were a total of 14 injuries (13 minor and 1 serious). The goal was set based on workplace risk assessments and preventive inspections at bank premises. The measurement method has not changed from previous years, and the method for recording workplace injuries is defined by the local occupational safety and health law.
- The goal of the Uzbek subsidiary is to maintain zero workplace accidents. Monitoring is conducted through quarterly reviews.

The main goal of the Ukrainian subsidiary in the area of occupational safety is also to maintain a zero injury and accident rate, which complies with the requirements of the Ukrainian Occupational Safety Law and the regulations on occupational safety services. The target value has been met; no accidents were registered in 2024.

Health and Safety Metrics
ESRS S1-14

Based on legal requirements and/or recognized standards or guidelines, the percentage of persons covered by the company's health and safety management system within the company's own workforce is 83%[83].

In those subsidiaries where such a system is in place, the number of persons covered is 100%[84]. Such a system is not in place in small subsidiaries.

[83] Apart from the small member companies, OTP Bank Croatia and CKB do not have such a system, and these member companies also comply with the legal requirements, including training of employees in occupational safety and health, risk assessment, and assessment of the adequacy of working conditions.

[84] The exception is OTP Bank Albania, where the rate is 99.71%.

Work-related injuries and illnesses, 31/12/2024:

OTP Group	2024
Number of accidents (pcs)	
employees	66
Accident rate (per 1 million hours worked)	
employees	0.85
Occupational illnesses (pcs)	
employees	0
Total number of calendar days lost due to work-related accidents and illnesses (pcs)	**1,384**
Number of fatal accidents and illnesses (pcs)	
employees	0

Working hours are mainly the number of hours actually worked, based on the time sheets. Where full records were not available, hours were estimated as the number of staff multiplied by the average annual hours worked.

3.1.4 Work-life Balance

Beside Code of Ethics, the work-life balance is covered by separate internal regulations according to specific practices that vary by country, in line with the applicable Labor Code in each country.

Action on work-life balance
ESRS S1-4

OTP Group continuously strives to achieve work-life balance, which can be particularly important in positions where working hours or activities carry specific stress factors. Various employee benefits and support systems are continuously available within OTP Group to help maintain employee well-being.[85]
The measures primarily focus on working hours and flexibility, leaves and absences, and welfare and recreational areas within the group. Effectiveness is monitored through regular employee engagement surveys and feedback collected after specific events and initiatives. Employee participation and engagement levels indicate the success of these measures.
89% of OTP Group employees positively evaluate that their direct supervisor supports them in maintaining work-life balance. This result exceeds the international industry benchmark (87%) and shows a 1 percent improvement compared to the previous year. Simultaneously, 81% of employees feel that their workload is manageable, representing a 3-percent improvement compared to 2023 and exceeding the benchmark value. Solutions for flexible employment and work-life balance, as well as a wellbeing/family-friendly approach, exist at all subsidiary banks, tailored to the legal and operational possibilities of the respective country. The above-average results within OTP Group are significantly supported by the practice of home office, part-time employment opportunities, managerial support, and family-friendly measures such as organizing summer camps and reward vacations or other benefits. (OTP Bank financially supports the use of paternity leave by paying 100% of the absence fee for the entire duration).

OTP Group offers opportunities for **atypical employment,** including part-time employment, remote work, and home office. Most countries provide flexible working arrangements.

- The Slovenian subsidiary holds the Family-Friendly Company certification, under which 16 measures are continuously available to various target groups to achieve better work-life balance. The certification is confirmed annually through an external audit.
- In Serbia, a hybrid work model (50% home office for employees whose job requirements allow it) and flexible working hours were introduced in 2024. A birthday leave policy was introduced, allowing employees to take an additional day off.
- The Uzbek Ipoteka Bank introduced a flexible work schedule in 2024. Additionally, it provided summer camp opportunities for employees' children.

[85] These are considered as actions.

- In Russia, a large-scale community program was created, with a total of 1,500 individual users in 17 communities. The common feature of these communities is that they focus on hobbies and personal interests, emotional intelligence development, talent development, and were created through employee initiatives.

3.1.5 Measures Against Workplace Violence and Harassment

Policies
ESRS S1-1

The prohibition of workplace violence and harassment is declared at the group level in the Code of Ethics (@G1-1, @S1-1).
Key content: Beyond the Code of Ethics, CKB within the Banking Group has a separate policy for handling workplace harassment (Mobbing Policy). The policy prescribes detailed procedures for handling discrimination cases.
Scope: The policy applies to CKB's own employees.
Accountable for implementation: The Head of Human Resources is responsible for implementation.
Consideration of the interests of key stakeholders: Employees were given the opportunity to provide feedback or file complaints regarding the effectiveness of anti-harassment measures, contributing to the continuous improvement of the policy. The policy was reviewed and amended in 2024.
Reference to third-party standards: Compliance with legal requirements, including the prohibition of workplace harassment and labour laws.
Availability: The document is accessible to employees on the internal intranet platform.

Measures against violence and harassment in the workplace
ESRS S1-4

The Banking Group implements measures related to the application of the Ethical Code on this topic (see @G1-3). The measures are considered effective and appropriate, given the low number of workplace violence and harassment cases (@S1-17).

3.2 Reporting policy regarding Chapter S1

Engagement indicator: one of the key indicators of OTP Group's engagement model is the engagement score. It is an output score that cannot be developed directly. Drivers are specific experiences (e.g. community building, empowerment, recognition etc.) through which an organisation can positively or negatively influence engagement. Engagement survey drivers are statements with which agreement is measured on a 5-point scale. Engagement, a composite indicator, reflects the average of the proportion of positive responses to the statements included.
S1-6 An employee is defined as any worker who has a direct employment contract with one of the Group's subsidiaries. The report includes only employees who are part of the active workforce. OTP Group consists of more than 100 subsidiaries, and we provide comprehensive metric data, except for certain specified exceptions. The presentation of policies, measures, and objectives related to the workforce covers large subsidiaries (with more than 250 employees). (see also @ESRS 2 IRO-2).
S1-6 50 a, b The number and distribution of employees at the end of the year are expressed in terms of the number of employees in service. We provide breakdowns in countries where the Group has 50 or more employees, who represent at least 10% of the total workforce. For gender breakdowns, the 'Other' category is not used; OTP Group's records include male and female genders, which are recorded based on the identity card.
Permanent employees: those employed under an indefinite-term employment contract.
Temporary employees: those employed under a fixed-term employment contract.

Non-guaranteed hours employees: the number of working hours is not specified in the employment contract.

The classification of full-time and part-time employees is based on the local regulations of each country.

S1-6 50 c When calculating turnover, the number of departed employees is the total number of employees who left the Group during the reporting period, including those who left voluntarily, were dismissed, retired, or passed away. The turnover rate is the number of departed employees divided by the year-end headcount.

S1-6 52 a, b The definition of a region in the report: country.

S1-6 50 d The employee data comes from the records of the companies' registration systems.

S1-9 AR 71 The Group applies the following definitions to senior management:

- OTP Bank Nyrt.: CEO and all of their deputies;
- Hungarian subsidiaries: the top executive of the subsidiary AND the managers covered by the remuneration policy;
- foreign subsidiary banks: The top executive of the bank (CEO) and their deputies, or the direct managerial level below the CEO (CEO-1).

S1-9 66 a, b At the senior management level, the gender distribution is determined based on the headcount (number of individuals) according to year-end data.

The number of employees by age group is expressed in headcount, i.e., the number of employees (individuals) at the end of the year. The age groups are as follows: under 30 years old (including the 30th birthday); between 30 and 50 years old (including the 50th birthday); over 50 years old.

S1-12 AR 76 Persons with disabilities include those employees who are classified as persons with disabilities under the relevant local legislation.

S1-12 77 The proportion of persons with disabilities among own employees: the number of employees with disabilities, divided by the total number of employees, in headcount, as of the balance sheet date (December 31).

S1-13 83 a, AR 77 A regular performance review is defined as a review based on criteria known to the employee and his or her superior undertaken with the knowledge of the employee at least once per year.

The Group considers all evaluations carried out to be accepted by management. The denominator includes the number of employees at the end of the year, expressed in headcount, broken down by gender and employee category.

For each S1 data point, employee categories are:

- Senior management: The definition is the same as the definition of senior management used to publish S1-9 – Diversity indicators.
- Middle management: Employees who are not part of the senior management group, but have professional and human resource management responsibilities for a permanent organizational unit, as defined at the company level.
- Subordinates: All employees who are neither senior managers nor middle managers, according to the definition defined at the company level.

S1-13 83 b, AR 78 When calculating the average training hours per employee, the total training hours are divided by the number of employees at the end of the year used for S1-6 disclosures. The trainings reported under this publication include all trainings except school-based trainings and vocational qualification trainings. Recurring training (e.g. compliance, safety, occupational safety etc.) is also included.

S1-14 The disclosure will apply to employees in 2024, in accordance with the definitions used for S1-6 disclosures.

Accidents to be recorded include accidents (including serious injuries and deaths) that occur during the reporting period. Accidents while commuting to work are only work-related if the Group is responsible for organizing commuting to work.

S1-14 88 c The accident rate is given per 1,000,000 hours worked.

The number of working hours is primarily the number of hours actually worked, based on the working time record. Where there was no complete record, the number of hours was estimated as the product of the number of employees and the average number of hours worked per year.

S1-14 88 e The Group publishes the number of days lost due to work-related accidents, work-related health impairments and deaths due to health impairments for employees. Lost days are calculated as the first full day and the last day of absence. Calendar days are taken into account in the calculation.

S1-16 97 a Calculation of the gender pay gap (%) is: (Average gross hourly wage level of male employees – average gross hourly wage level of female employees)/(Average gross hourly wage level of male employees). The hourly wage level is the total benefit divided by the number of hours worked. The total allowance is the total annual payment. The calculation includes data on all employees of Group entities that have at least 15 employees on the balance sheet date.

S1-16 97 b The annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual). The calculation includes the basic salary and all other benefits and remuneration (additional or variable elements). Due to the difficulties of data aggregation, the median data for employees includes data for a total of about 38,000 employees.

S1-17 103 a The Group discloses the total number of incidents of discrimination, including harassment, reported in the reporting period.

S1-17 103 b, c The Group Discloses the number of complaints submitted through the channels available to its own workforce during the reporting period and the total number of fines, penalties and compensations.

3.3 Clients

Safety and secure operations are paramount for OTP Group. To this end, we assess and manage risks affecting our operations and establish strong protections against fraud attempts.

In developing our products and ensuring the accessibility of our services, we adhere to ethical and consumer protection principles and regulations that provide modern, high-quality, and fair services that meet customer needs. We are committed to the financial well-being of our customers and offer products that align with their real needs and capabilities. Financial products and services are often complex and understanding them requires proper communication practices from the Banking Group. We always strive for clear, understandable communication and customer service.

Material Impacts, Risks
ESRS S4 SBM-3

In all cases, the impacts and risks are aroused by member companies providing financial products and services to customers.

Material sub-topic	Type of impact, risk, opportunity	Description of impact, risk, opportunity
Information security and data protection[86]	positive impact	The banks of the Banking Group possess a lot of sensitive data about their customers, and the implementation of personal data protection and information security has a positive impact.
	negative impact	Despite strong protection, customers may still suffer damage.
	financial risk	Data protection deficiencies and successful information security and cybersecurity attacks pose a risk.
Quality information[87]	positive impact	The provision of quality information positively influences customers' well-being and financial situation through a better understanding of financial products.
	negative impact	Due to the complexity of financial products, the obligations of information provision, and their changes, there is always room for improvement.
Access to Financial products and services[88]	positive impact	The accessibility of financial products for people with disabilities and disadvantaged customers helps improve the well-being of these customer groups.
	negative impact	Accessibility cannot be considered comprehensive.

For a more detailed description of the effects, risks and opportunities, and their management, see @SBM-3 and subsequent sections of this chapter.

Information security and data protection

The Banking Group's banks hold a lot of sensitive customer data. The protection of personal data and information security, and cybersecurity breaches or improper handling, can undermine customers' sense of security and cause harm. Successful attacks and incidents can also cause significant losses for the Banking Group, thus posing financial risks.

Nowadays, a significant portion of property crimes (fraud) is committed online. This phenomenon is global and widespread, and it is observed that property crimes are mostly committed online for both the parent bank and subsidiaries of OTP Group. In response to these trends, legislators increasingly regulate banks' preventive tasks.

Based on regular evaluations and analyses of fraud experiences and victimization processes, we have found that the digitally less skilled segment may be negatively affected (see below for more details on the most affected customer groups). The insufficiently cautious use of financial products (e.g., mobile applications) from a security perspective and fraud can negatively impact the protection of their personal data. Given that fraud attempts increasingly occur in the digital space, the means of defense are also digitalized, and understanding and effectively using these tools can be challenging for the mentioned customer group.

Quality information

Quality information provision ensures objective information and understanding of financial products for all customers. Its implementation affects customers' well-being and financial situation, as a financial product can significantly impact a customer's life, contributing to achieving financial or life goals (e.g. mortgage, consumer loan, savings products). Vulnerable customers often hesitate to approach financial service providers, especially if they struggle with literacy. For digital services, using electronic devices can be an insurmountable barrier for many. Simple and transparent product design allows consumers to use products appropriately and builds trust. If these individuals do not have access to financial products, it can make it more difficult for them to buy a home, pursue further education, save effectively, and thus worsen their living conditions.

The quality of information primarily affects the most affected customer groups listed below. To prevent negative impacts and achieve positive effects, we have created a Financial Awareness Strategy, continuously improved the comprehensibility of our documents, and published educational and informative

[86] Impacts on consumers and/or end-users related to information: Privacy protection (ESRS 1 AR 16). At OTP Group, this topic encompasses not only the protection of personal data but also information security and cyber protection, as these are interconnected topics within the Banking Group, although the ESRS does not specifically name the latter.
[87] ESRS: Impacts on consumers and/or end-users related to information: Access to (quality) information (ESRS 1 AR 16)
[88] ESRS: Social inclusion of consumers and/or end-users: Access to products and services (ESRS 1 AR 16)

materials. The Banking Group pays attention to imparting knowledge related to using online channels.

Access to Financial Products and Services

Access to financial products and services can help or hinder customers' well-being and success. In addition to accessible services for people with disabilities, access for residents of disadvantaged areas and those in disadvantaged social situations is significant.
Access to products and services primarily affects the most affected customer groups listed below. To prevent negative impacts and achieve positive effects, we continuously improve both physical and digital accessibility. In Hungary, we have established a mobile bank branch and are working on launching Social Lab social projects. At the group level, we continuously expand the range of partially or fully digitally accessible products.
The Banking Group provides access to state-supported mortgage schemes in several countries.
The management of these impacts and risks is detailed in the chapter.

Most Affected Customer Groups

The most affected consumer groups in the listed impacts are as follows:[89]

- Financially vulnerable individuals: These customers rely heavily on financial services to meet their basic needs, often with limited financial knowledge and resources. They are more likely to fall victim to poor financial management and fraud.
- Elderly customers: This group often has less familiarity with digital services. Those with lower digital literacy are at greater risk of cyber threats and misuse of digital financial services. They are also more likely to be misinformed and may find it difficult to understand complex financial products and services.
- Children and young adults: Due to their age and inexperience, they are particularly vulnerable to data protection impacts and marketing strategies that may exploit their inexperience.
- People with disabilities: They may face challenges accessing physical or digital services. They may need accessible branches, services, and digital products to use financial services effectively.

OTP Group's customer policies are in line with the EU's consumer protection-related relevant regulations, which have been implemented in Hungarian law[90]. Respect for human rights is declared in the Code of Ethics (@Code of Ethics) and is thus incorporated in all customer policies, applied in the customer interaction processes and included in the measures to ensure and/or enable remediation.

[89] Segmented by financial status (income level, creditworthiness, and dependence on financial support), age, digital literacy, and disability status. The segmentation was carried out by OTP Bank Slovenia, but we consider it appropriate at the group level.

[90] a./ Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activity; Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC, and 2002/65/EC of the European Parliament and of the Council, and Directive 2005/29/EC amending Regulation (EC) No 2006/2004 of the European Parliament and of the Council

b./ Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices; Articles 85 and 86 of the Treaty of Rome (EEC Treaty); Council Regulation 19/65/EEC on the application of Article 85(3) of the Treaty to certain categories of agreements and concerted practices

c./ Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices; Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council, and Regulation (EC) No 2006/2004 of the European Parliament and of the Council (Directive on Unfair Commercial Practices)

d./ Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services; Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market ("Directive on electronic commerce")

e./ Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises; Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC, repealing Directives 2006/48/EC and 2006/49/EC, and Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms amending Regulation (EU) No 648/2012

f./ Act CLXII of 2009 on Consumer Credit; Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC

g./ Government Decree 83/2010 (III. 25.) on the determination, calculation, and disclosure of the Annual Percentage Rate Indicator

h./ Government Decree No. 82/2010 (III. 25.) on calculating and announcing deposit interest rates and returns on securities

i./ Government Decree 144/2018 (VIII. 13.) on certain issues of Information on issues related to the provision of information on fees for consumer payment accounts (PAD) Directive 2014/92/EU of the European Parliament and of the Council of 23 July 2014

Processes for engaging with consumers and end-users about impacts
ESRS S4-2

To improve the customer experience, OTP Group regularly collects customer feedback and measures customer satisfaction. We measure retail customer satisfaction at the group level in a unified manner using the TRI*M methodology, supplemented by the NPS[91] and SQM[92] methodologies at some subsidiaries.
We analyze information by customer segments (e.g. entry-level, juniors, premium customers). Through TRI*M, we measure the overall satisfaction and loyalty of our own banks as well as all significant competitor banks' customers, along with the factors that most determine satisfaction. We conduct one measurement per country annually, with a representative[93] sample of 1,000 people.
Complaint handling is also a tool for engaging with customers (see @S4-3).
The Banking Group does not engage in regular cooperation with consumer organizations or consumer representatives.

Customer-Centric Product Development

To support customer-centric product, process, and service development, we established a group-level framework in 2024. OTP Group Service Design Framework emphasizes understanding customers and other stakeholders involved in the development process before starting the design. The framework is based on service design methodology and includes research and design tools that support data- and research-based product and service development. We introduced the framework at the group level to ensure high-quality services for customers at all OTP Group members. The Service Design Framework is available in Hungarian and English to assist all colleagues and partners involved in designing or developing banking products, services, or processes. The central pillar of the framework is the Service Design Portal, a practice-oriented guide and knowledge base. The frame-work also includes a one-day customer-centricity training, a service design methodology card set, digital tool templates, personal support from the Service Design Group, the Research Group, or the CX Design CoE, and a Service Design Playbook for leaders.
To better understand customer opinions, the Montenegrin subsidiary introduced the Customer Live Voice initiative in 2024. Workshops held under this initiative allow customers to provide feedback on their satisfaction with services, what they appreciate, what they dislike, and what changes they would like to see. Workshops have been held with young customers, retirees, and sailors so far.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns
ESRS S4-3

The Banking Group members provide a wide range of complaint channels for their customers. Complaint handling processes are regulated, and complaint handling is non-discriminatory and in line with internationally recognized human rights. Group members respond to complaints in accordance with the local legal environment. The Banking Group strives to engage in dialogue with complainants to achieve a prompt resolution. In the case of justified complaints, OTP Group aims to restore the original state or establish an appropriate state and, in individual cases, apply compensation considering fairness.

Channels Available to Customers for Submitting Complaints

Customers can submit complaints through the ethical reporting system (see @G1-1) and complaint reporting channels (website, telephone customer service, in person at branches, by postal mail). Customer access is not restricted on any channel, and at OTP Bank, inquiries received through other channels (e.g., social media) are also forwarded to the complaint handling area. At the Slovenian subsidiary, customers can submit complaints

[91] Net Promoter Score – customer satisfaction metric.
[92] Service Quality Management, which examines the quality of retail and SME branch customer service.
[93] By age, gender, educational attainment, type of settlement, and regional distribution.

to any bank email address, as all employees must enter received complaints into the complaint handling program.

In Hungary and Bulgaria, in addition to the listed channels, customers can also submit complaints to the National Bank and the financial arbitration body in EU member states where group members operate.

OTP Group informs customers about complaint reporting channels, the complaint investigation process, through websites, publications, written communication with customers, regulations available in bank branches, and social media. The channels are clearly usable for generally prepared customers. We do not specifically examine the level of trust in the channels, but the fact that complaints are received through the channels implies customer trust in the company and the operation of the channels.

OTP Group handles and stores the content of reports and related data confidentially in accordance with applicable laws and its Code of Ethics (see @G1-1).

Ensuring the Effectiveness of Complaint Handling, Tracking Issue

The tracking of raised and handled complaints at OTP Bank and several subsidiaries (DSK Bank, Slovenian, Croatian subsidiaries, and CKB Bank) is done in dedicated complaint handling systems or other IT systems (Ipoteka Bank, Ukrainian and Albanian subsidiaries). At subsidiaries where these are not available, operational processes support effective complaint handling. Individual identifiers are allocated to the complaints, making them easily trackable in the systems. Each case has a clearly designated responsible employee or group who reviews and resolves the issue. Customers are informed about the complaint handling process and any necessary actions.

Monthly, quarterly, and annual reports are prepared on the number, status, and resolution times of received complaints. These reports help track process effectiveness and identify areas for improvement. By analyzing aggregated data, we identify recurring problems that indicate potential systemic weaknesses and enable corrective actions. We track the frequency of use of each channel. Traffic analysis provides insight into which channels customers prefer and helps identify issues related to the channels. We evaluate response times: delays may indicate deficiencies that need to be addressed.

In Bulgaria, customer satisfaction with complaint handling processes is measured using surveys, in Slovenia through telephone interviews. Feedback on complaint handling is also collected in Serbia, Albania, Montenegro, and Moldova. Feedback helps improve the effectiveness of complaint handling.

In the case of errors affecting multiple customers or significant financial losses, complaint handling collaborates with the relevant department to track error corrections.

Improving Complaint Handling

OTP Group pays special attention to continuously improving its services, based on information and experiences revealed during complaint investigations.

Several group members improved their complaint handling systems in 2024.

OTP Bank began developing a new complaint handling interface in 2024. The new structure will enable the automation and process control of various complaint handling processes. Among other goals, it aims to facilitate processing times and reporting.

DSK Bank conducted a comprehensive development: they analyzed complaint handling processes and their key indicators, identified main problems, created standard workflows with clear steps and responsibilities, renewed complaint handling policies, and provided development training and communication skills training for employees to improve complaint handling quality. They improved the transparency of complaint handling for affected customers by communicating the status of complaints. The Customer Experience Committee, chaired by the bank's CEO, reviews incoming complaints monthly.

The Slovenian subsidiary made several improvements to the complaint handling software to better protect customer data, store attached files more transparently and improve the overview of complaint types. They conducted numerous training sessions for different bank departments on the complaint handling process and software use.

The Croatian subsidiary improved communication between departments to respond to complaints more quickly.

CKB introduced new complaint handling software that ensures all complaints are automatically directed to the expert group responsible for the specific service. The system significantly accelerated complaint handling processes.

Number of Customer Complaints

OTP Group handles a large number of complaints year after year. Through the harmonization of complaint handling procedures and definitions, the content of complaint handling data is becoming increasingly uniform at the group level. However, the different cultures and financial knowledge in each country also influence customer complaint habits, so the customer complaint data of subsidiaries is not comparable.

Customer complaints:

	2024
Number of closed complaints	~581,000 pcs
Number of substantiated complaints	~308,000 pcs

Beyond complaints, OTP Group received a total of 612 ethical reports through the Ethical Reporting System in 2024, of which 106 were from employees, and the remaining from customers and other stakeholders. The number of reports from customers cannot be specified due to anonymity.

The number of reports received through other channels was 7,811 in 2024, the vast majority of which were received by the Ukrainian and Moldovan subsidiaries. The Ukrainian data includes all other reports, not just those from customers and not just complaint-related reports (The Albanian and Russian subsidiaries could not provide data).

Combining reports from these channels, the total number of customer complaints received by OTP Group was approximately 589,000.

In 2024, there were no serious human rights incidents related to customers in OTP Group.

OTP Group does not currently require its business partners to have channels available for submitting complaints. The Banking Group makes recommendations for terminating business relationships with customers based on all facts and circumstances available and usable by the Banking Group, including the actual or potential negative impacts of the recommendation on other customers.

3.3.1 Information Security and Data Protection

Policies
ESRS S4-1

Anti-fraud Policy

Key content: The policy covers the evaluation of current fraud prevention and management practices, mapping future fraud trends, assessing the financial organization's involvement, responding to trends, and defining related goals and tasks. The policy declares that OTP Group ensures the prevention, detection, and investigation of fraud in accordance with legal requirements and the guidelines of European and domestic financial supervisory authorities. It summarizes the regulatory environment, general goals of combating fraud – emphasizing the role of employees – and defines the principles and basic concepts of anti-fraud activities, as well as the place of the fraud prevention function within the internal defense lines system.

The policy outlines OTP Group's tasks for preventing fraud, highlighting the criteria for detecting and uncovering fraud, the efficiency of information flow, real-time transaction monitoring, investigating suspicious events,

and necessary actions, provisions for determining or excluding internal perpetration, the role of education, forums related to fraud prevention, and the role of feedback. It also includes provisions for fraud risk self-assessment. It details the main tasks of the Fraud Competence Center and the framework for cooperation with various internal control functions and departments. The policy is further detailed by the Fraud Prevention Strategy and additional internal regulations and procedures, which are shared at the group level.
Scope: The policy applies to the entire OTP Group organization, as foreign subsidiaries must also transpose the regulations through an implementation annex. Fraud prevention and management activities apply to all customers and all activities and services of the Banking Group.
Accountable for implementation: The Executive Steering Committee is accountable for the policy's implementation. The Committee monitors anti-fraud functions that significantly impact customers, measures activities, and determines corrections if necessary.
Availability: An @excerpt of the policy is available on the Bank's website, making it accessible to stakeholders. The policy's requirements are integrated into the Banking Group's procurement processes, and potential suppliers must attach a declaration during the tender process stating that they have understood and will comply with the relevant policies of the Banking Group during cooperation.

Consideration of the interests of key stakeholders: Continuous monitoring of fraud events has mapped the general characteristics and traits of victimized groups. These have been incorporated into the detailed rules of fraud prevention and management activities, while the principles were uniformly defined for all stakeholder groups during policy development.

Reference to third-party standards: Compliance with legal requirements, European and domestic financial supervisory authorities' guidelines, and MNB Recommendations.
In 2024, most subsidiaries implemented the tasks and procedures of the Fraud Competence Center (CSEKK), OTP Bank's anti-fraud policy, OTP Banking Group's anti-fraud strategy, or are in the process of establishing the conditions for implementation. The second set of anti-fraud regulations issued for implementation in 2024 (detailed description of OTP Bank's fraud prevention process; procedures for the Investigation Department's activities; Fraud Forum rules of procedure) is also being adopted.

Security Policy

Key content: The Security Policy aims to summarize security principles, outline the main directions of security activities, and collectively define, facilitate, and support the proper, lawful, safe, and prudent operation of the Banking Group, considering international and domestic laws, recommendations, expectations, and guidelines. The Security Policy complies with international and domestic laws, recommendations, expectations, and guidelines.
Scope: The Security Policy is a group-level regulatory document, and its implementation is mandatory for OTP Group members operating in Hungary and abroad.
Accountable for implementation: The Security Directorate is responsible for implementing the policy and reports to the Executive Steering Committee at least once a year.
Availability: The policy is available in the internal regulatory repository.
In addition to these policies, the adoption of OTP Bank's ICT (information and Communication Technology) and information security policy is underway, and its group-level implementation will also be required.

Data Protection Policy

Key content: The Data Protection Policy is part of the Compliance Policy (see @G1-1). The policy states that the Banking Group respects fundamental rights and ensures full compliance with data protection principles when handling personal data and transferring data to third parties. OTP Bank and the affected OTP Banking Group members handle personal, bank, securities, or pension fund secrets that come to their knowledge with a high level of protection as required by law.
Scope: Group-level operations are unified in terms of data protection, with all companies

implementing the relevant compliance minimum standards in accordance with the laws of the respective country, making the policy's scope group-wide.

Accountable for implementation: The Data and Consumer Protection Department coordinates the policy's implementation. The head responsible for banking data management and protecting customers' personal data is the Deputy CEO of the Digital Division and the Data Protection Officer (directly accountable to the highest management of the data controller or processor; does not accept instructions from anyone regarding their duties). The practices of group members are not uniform but always comply with local legal requirements. Where there is a Data Protection Officer, they are responsible.

Availability: OTP Bank's policy is available on the @website, and subsidiaries also publish it. There were no significant changes in the policies in 2024. Supervisory recommendations were incorporated into procedures but did not result in substantial modifications.

Actions
ESRS S4-4

Information security and Fraud Management

This section first provides information on the measures related to information security and fraud management, followed by a presentation of the measures grouped by their nature. The Executive Steering Committee (ESC), OTP Bank's coordination and operational decision-making forum, includes discussions on fraud-related topics, ensuring coordination with business areas at the highest level. Decisions on necessary measures for a predefined range of suspicious fraud events are made at various committee levels. As a best practice, committees involve representatives from the business or other areas directly affected by the suspicious event, members of the governance body, and representatives from other committees (e.g. Group Operational Risk Management Committee and internal control functions).

Internal communication between organizational units is constant, with continuous analyses of fraud committed against customers, and sharing of experiences with all relevant departments. The continuous evaluation and analysis work is fed back into the decision-making process and used to determine appropriate measures. Based on experiences, we develop necessary competencies and adjust the organizational structure. In combating fraud, we uphold the following principles[94]:

- Protection of customers and the bank
- Zero tolerance
- Primacy of fraud prevention
- Completeness
- Speed
- Objectivity and proportionality
- Integrity and the role of employee ethics
- Importance of cooperation
- Emphasis on feedback and innovation

Since fraud behaviours are constantly changing, key measures must also be adapted to these ever-changing circumstances. This activity is not time-bound. Immediate, as quick as possible action is essential. Time-bound tasks are those defined by laws, regulations, and recommendations issued by legislators, which include deadlines for us.[95] We always adhere to the specified deadlines, which are indicated when presenting the relevant measures.

We continuously develop the technology used, exploring the possibilities of applying artificial intelligence during developments. We pay special attention to following best market practices. In technological developments and education, we consider surveys that contain customer needs related to the given process. Our latest survey on "customer bank security awareness" was completed in December 2023 and evaluated in 2024.

OTP Bank's Cyber Defense Center enables a wide-ranging and high-quality[96] education for employees involved in the Banking Group's

[94] The principles are defined by the Anti-Fraud Policy and the Anti-Fraud Strategy.
[95] MNB regulations and recommendations regarding the prevention, deterrence, and management of fraud.
[96] Globally recognized certifications: CompTIA Information Technology (9 certifications), Blue Team Level 1 for handling cybersecurity incidents (7 certifications), Microsoft Cybersecurity (2 certifications), ITILv4 (2 certifications), and GIAC Forensic Examiner for conducting computer forensic investigations (1 certification).

fight against fraud, creating a positive impact that extends beyond the workplace to broader social groups. Education is a continuous activity.

The measures listed below affect all activities of the Banking Group and all customer groups, except where otherwise indicated in the text. These practices generally apply to all measures listed below.

Organizational changes

In 2024, the Bank's Security Directorate implemented significant organizational changes to reduce fraud against customers, enable the prompt reporting of fraud incidents, and recover stolen funds. These changes included human resource reallocation and staff development. Units were created with dedicated tasks to combat fraud and perform related activities (e.g. Investigation Department, Fraud Management Support Department, Fraud Competence Center).

Supporting Subsidiaries' Anti-Fraud Efforts

The parent bank continuously supports and monitors subsidiaries' anti-fraud efforts, strengthening or establishing anti-fraud capabilities where they were not previously available. In 2024, subsidiaries also established dedicated anti-fraud coordination or fraud prevention organizational units.

At subsidiaries where a comprehensive fraud monitoring system is not currently in place (Croatia, Serbia, Uzbekistan, Ukraine, Albania, Moldova), the implementation, selection, or feasibility study of a comprehensive or e-channel fraud monitoring system based on existing monitoring capabilities is underway. The Security Group Management Department supports the anti-fraud activities of foreign subsidiaries and strengthens their effectiveness by sharing best practices and raising awareness, organizing and conducting presentations and workshops, and striving to optimize subsidiaries' own local practices and processes (e.g. anti-fraud communication workshop). A significant result of this is the increasingly intensive use of the Fraud Information Sharing SharePoint platform, created at the end of 2023 to share fraud prevention information more effectively. Subsidiaries receive regular (monthly) feedback on platform utilization.

The Cyber Defense Center addresses cross-border fraud types and perpetrator groups through group-level indicator sharing and incident management to detect and neutralize their impact.

Managing Product-related Risks

The Banking Group considers identified risks when developing new products and services and modifying existing ones. To protect products and services we apply protective measures proportional to the risks, and strive to achieve the highest level of security, with special attention to conducting electronic transactions in cyberspace.

Developments

Numerous technical and software developments have been made to prevent fraud. Following the development of the Bank's Cyber Defense Center, we can detect and take necessary actions within a short time against written or visual misuse of the OTP brand in the online space. This solution has managed the removal and reporting of thousands of phishing sites and misleading advertisements to authorities, contributing to preserving customers' assets and avoiding significant rights violations. As a result of our brand protection activities, 23.664 social media posts and 127 social media accounts were taken down. These measures significantly reduced Foxpost-type fraud[97], resulting in a positive social impact.

To reduce phone fraud, we implemented several developments, one of the most significant being the ability for all InternetBank/MobileBank users to verify the identity of the caller claiming to represent the bank through the mobile application.

[97] Foxpost fraud: one of the most common types of phishing scams. A buyer applies for a product advertised on an online classifieds site and wants to arrange delivery via Foxpost. You send a link to the seller with a fake Foxpost page, the seller (victim) navigates to the fake OTP InternetBank login page. Here, the data entered with the intention of logging in is used by the abusers in real time, to register a new device for mobile banking.

In Hungary, we will join the state Central Fraud Filtering System (KVR) coordinated by the MNB, with the necessary technical and system development completed in 2024.

As part of the CyberShield Program, a recommendation was developed to facilitate communication with victims of online financial fraud through the cooperation of the Hungarian National Bank, the Ministry of Justice, and the Hungarian Banking Association. Our bank fully complies with these provisions in communication with customers.

The Slovenian subsidiary launched a development project to manage customer losses due to fraud. The project aims to reduce customer losses even if they result from customers' insufficient caution or lack of understanding of digital solutions. The bank operates a special @website to inform customers about fraud types and protecting their data.

The Ukrainian subsidiary implemented an information security management system compliant with the ISO/IEC 27001:2015 standard, certified by an external party. Additionally, it received independent certification for compliance with the PCI DSS 4.0 payment system security standard and the SWIFT Customer Security Program standard.

Customer Education

Based on the characteristics of actual or potentially negative impacts on customers, we strive to mitigate these impacts through customer education. We centrally support subsidiaries on certain issues (e.g., workshop on anti-fraud communication best practices) and expect them to organize up-to-date customer-side education independently. OTP Bank and subsidiaries communicate with customers through various channels (e.g. website, internet banking, social media), warning them about fraud and deception.

OTP Bank developed a segmented, continuously expanding educational campaign to inform existing and potential customers and, more broadly, society, increasing security awareness. The campaign presents target groups with the types of fraud that threaten them and the Bank's protective measures.

In case of fraud or abuse, we ask customers to report incidents immediately, providing a phone number and email address directly connected to the Fraud Management Department. Several radio spots ran on the topic, warning older people in clinics, newspapers, radio, and TV programs, and addressing young people beyond the online space in their favourite shows. All these efforts directed them to an @educational page where they could test their knowledge.

We distributed 150.000 leaflets in bank branches informing about fraud methods and avoidance possibilities. To reach older, rural customers who do not or barely use electronic channels, we partnered with Mediaworks, distributing 200.000 brochures on the most common fraud methods to households through county newspapers.

In the fall of 2022, the Hungarian National Bank, the Hungarian Banking Association, the National Police Headquarters, the National Security Service's National Cyber Defense Institute, and the National Media and Infocommunications Authority launched a joint communication and education campaign as part of the previously mentioned **CyberShield program.** The organizations continuously examine consumer habits, their changes, and fraud patterns and cybersecurity risks observed in financial transactions. They consider international trends, incorporate these experiences into their professional work, and ultimately use them to enhance the financial system's security and increase customers' financial awareness. OTP Bank also participates in these activities. As a result of the cooperation between the National Bank of Hungary, the Ministry of Justice and the Hungarian Banking Association, a recommendation has been prepared to facilitate communication with victims of online financial abuse, and the Bank will comply with its provisions in all its communications with customers.

The Slovenian bank runs a special @website to inform customers about types of fraud and how to protect their data.

The Ukrainian subsidiary also participated in a fraud prevention campaign, the Ukrainian

#Fraudster Goodbye online initiative, under the auspices of the National Bank of Ukraine, organizing various training sessions and courses on different fraud scenarios.

Collaborations

OTP Bank dedicates significant resources to establishing various collaborations. By involving sectoral advocacy organizations, it makes proposals for developing sector-wide unified solutions for customer education and protection, as well as for more effective customer protection through supervisory or legal standards. Our bank representatives regularly participate in the working committees of the Hungarian Banking Association. The Cyberlab operates within the framework of cooperation between OTP Bank and ELTE,[98] where ELTE students conduct research on cybersecurity topics. The Bank defines the research topics. The goal is always to find quick and effective defense methods and practical implementation possibilities.
OTP Bank Plc. cooperates with the National Police Headquarters, establishing 24-hour contact to assist the authorities in taking quick and effective action.
Our bank actively participates in the work of the Information Security Section of the Scientific Association for Infocommunications (EIVOK – National Community of Electronic Information Security Leaders). The Bank supports and hosts EIVOK's regular meetings and lecture series to enable other organizations to have a positive social impact in cybersecurity through experience sharing.

Damages[99]

OTP Bank continuously analyzes customer damages to improve the efficiency and development of its systems. Constant adaptation to changes in fraud behaviours is reflected in the Bank's protective systems. For example, in 2024 there were more than 100 minor or major modifications to the rules applied in the real-time monitoring system for fraud prevention. At the group level, active experience sharing occurs during regular fraud prevention meetings. We monitor customer damage data at the group level. Where there are significant values or trends, we request additional measures from the group member.
In the case of customer damages, we ensure correction through regulated and consistent evaluation and analysis work, feedback, and, if necessary, the introduction of measures with responsible parties and deadlines. This is followed by feedback on the effectiveness of the corrective steps, with regular reporting to management.
OTP Bank always compensates the customer if the damage was caused by the Bank's fault (e.g. certain banking systems did not function or functioned improperly at a given moment). Compensation is carried out in accordance with the regulations in force in the respective country at all subsidiaries.

Data protection

The Banking Group's data management processes operate within constant frameworks and regular activities. These processes are designed in accordance with data protection laws, with a focus on purpose limitation and necessity. Customers are always informed about data management processes related to their personal data. The compliance control tools monitor the adequacy of data protection processes. These include audits to check the legal compliance of individual products and processes, and recommendations for action in case of deficiencies. OTP Bank cooperates with the Banking Association and authorities, regularly participating in the Banking Association's data protection working group meetings.
Data protection training is mandatory for everyone at the group level. Consumer protection training is mandatory for colleagues dealing with customers or product development at OTP Bank and some domestic subsidiaries. Designated data protection officers in OTP Group banks ensure that data management expectations (e.g. supervision of personal data management, data minimization principle, handling high-risk data) are met. To this end, data protection officers participate in professional training annually.

[98] Eötvös Loránd University
[99] Damages characterize the effectiveness of the measures, not the measures themselves.

Customers have access to complaint handling options in case of abuses due to OTP Group's data management practices, and suspicions of ethical violations (including human rights abuses) can be reported through the ethical reporting system.
Customer reports and complaints are examined, and if data protection deficiencies or errors are identified during the investigation, improvements are initiated for the affected product, service, or process. OTP Bank's Data and Consumer Protection Department informs the data protection officer network and compliance officers about the prescribed measures for identified deficiencies through newsletters. The Data and Consumer Protection Department regularly conducts risk analysis studies in the data and consumer protection area to assess significant negative impacts. In preventing and mitigating risks, the Department cooperates with other departments and makes recommendations for incorporating appropriate measures into processes.
Customers have access to complaint handling options in case of abuses due to OTP Group's data management practices, and suspicions of ethical violations (including human rights abuses) can be reported through the ethical reporting system. Among the data breaches that occurred in OTP Group, 130 incidents happened at OTP Faktoring due to incorrect addressing. Another 21 data leakage incidents occurred at the Slovenian subsidiary, primarily due to administrative negligence, and another 12 incidents occurred at the Croatian subsidiary bank due to incorrect addressing.

GRI 418-1 **Breaches of customer privacy and personal data, OTP Group:**

		2024
number of substantiated complaints by external parties	(cases)	39
number of complaints by regulatory authorities	(cases)	17
number of breaches of customer privacy	(cases)	37
number of data theft incidents	(cases)	0
number of times data were lost by the organization	(cases)	0

For legal proceedings related to data protection violations see @G1-4.

Targets
ESRS S4-5

The Fraud Prevention Strategy includes goals directly and indirectly related to information security and data protection:

- Obtaining ISO 27001 Information Security Management System certification for the Cyber Defense Center's information security incident management process by 31 December 2025.
- Executing business-side tasks according to the schedule for implementing the MNB Central Fraud Filtering System at OTP Bank and using data from the operational system for monitoring activities, with a target start date of 1 July 2025.
- Installing cameras on 200 ATMs by the end of 2025, based on the 2024 baseline year, to increase the chances of identifying individuals involved in fraud.

Some goals expect the implementation of specific measures, while others set targets for reducing fraud (in addition to the above, several sub-goals are outlined in the strategy). The goals are partly absolute and partly relative, and some, as well as the effects of measure-related goals, can be monitored with statistical data. Based on data on fraud events, we monitor both the frequency of fraud and the damage caused, along with the exact development of methods and the characteristics of the affected customer base.

Goals are generally set for a one-year period. Based on the analysis of results, we determine whether the goal has been achieved or if further

measures are needed. We do not modify the goal until it is achieved.
The achievement of goals is measured through trend analysis of values measured and periodically reported at relevant points in the group-level risk framework. We analyze data on frauds committed against customers within daily, bi-weekly, weekly, monthly, and quarterly trend tracking frameworks and intervene immediately if necessary. Data is also reported to the governing bodies.
The goals were defined based on results from evaluation and analysis activities, aiming to reduce factors identified as risks in our reports. Customer involvement was achieved through public forums, marketing questionnaires, various surveys, and feedback. We involved organizational units affected by fraud prevention in goal setting through continuous communication and had each unit review the finalized goals.
To ensure the stability of terms used in the goals, we included the basic concepts of anti-fraud activities in both the Bank's Anti-Fraud Policy and Strategy, creating a unified terminology for describing various fraud activities in everyday language, facilitating effective information flow during cooperation and communication between different organizational units.

Policies, standards, and other documents considered in goal setting:

- The Banking Group's Anti-Fraud Policy and other internal regulations
- OTP Bank's Fraud Risk Self-Assessment and the accompanying action plan
- Commission Delegated Regulation (EU) 2018/389 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council regarding regulatory technical standards for strong customer authentication and common and secure open standards of communication
- Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022, on digital operational resilience for the financial sector (DORA)
- ISO27001 standard
- MNB Recommendation 12/2022 (VIII. 11.) on the establishment and operation of internal defense lines and governance and control functions of financial organization"
- MNB Recommendation 5/2023 (VI. 23.) on the prevention, detection, prevention, and management of fraud observed through payment services"

3.3.2 Access to Quality Information

Policies
ESRS S4-1

Responsible Marketing Policy

Key content: The policy states that OTP Bank is committed to responsible marketing of its products, prioritizing fair commercial communication, accurate information, and product recommendations. OTP Bank ensures that existing and prospective customers are accurately, clearly, and comprehensively informed about products and services and their conditions of use, complying with consumer protection regulations. The Bank is committed to not encouraging irresponsible spending through borrowing, not promoting overconsumption, helping consumers manage finances reasonably while considering sustainability, and not suggesting that repaying loans is easy.
Scope: The policy applies to OTP Bank and is recommended for subsidiaries.
Accountable for implementation: The Head of OTP Bank's Marketing and Communications Directorate is responsible for implementing the policy.
Availability: The policy is available on the @website and in the internal regulatory repository, and the Marketing Director has shared it with subsidiaries via email.
Reference to third-party standards: The policy requires compliance with the Hungarian Advertising Code, based on the International Chamber of Commerce's Advertising and Marketing Communication Code, developed by the Self-Regulatory Advertising Board.
The implementation of the responsible marketing policy is supported by the group-level

Tone of Voice handbook, which defines the communication style. Clear and understandable language is a fundamental goal and expectation. The handbook provides templates and guidelines for bank communication (from customer letters to digital and social media platforms and advertisements).

New employees in the Marketing and Communications Directorate participate in internal training on clear communication, which includes using the handbook. Regular training, repetition, and practical examples are provided to ensure clear communication becomes a core competency for communication staff.

Financial Education Strategy

Key content: The strategy aims to increase the number of customers who navigate finances confidently and consciously, managing their finances with a product portfolio that supports their goals.

Scope: The strategy was in effect for OTP Bank in 2024 and will be extended to subsidiaries in 2025.

Accountable for implementation: The strategy was adopted by the ESG Committee in 2024, and the Head of the Marketing and Communications Directorate is responsible for its implementation.

Reference to third-party standards:
The motivation was OTP Bank's commitment to the UNEPFI Principles for Responsible Banking, aiming to reduce negative and increase positive social impacts in financial awareness and access. The MNB also expects financial institutions to focus on developing financial awareness as part of their social responsibility.

Actions
ESRS S4-4

Customer Education

OTP Group places great emphasis on educating customers about various financial products and using digital channels and tools.

The Banking Group's banks conduct education according to their practices, with the parent bank and several subsidiaries improving their information and communication practices throughout the year.

At OTP Bank, customer education is part of the expectations for branch network colleagues and their job responsibilities. Customer service advisors in branches are tasked with educating walk-in customers on using self-service channels, such as ATMs, InternetBank, and MobileBank applications. This expectation also applies to other advisory roles.

For credit products, OTP Bank always emphasizes responsible borrowing to customers. The website provides the Hungarian National Bank's information on the risks of excessive indebtedness and other MNB Financial Navigator materials.

In recent years, OTP Bank has conducted several media campaigns to increase financial awareness, conducting research to determine target groups and messages. Research shows that family patterns significantly influence young people's money management, but parents often do not realize this and intentionally avoid discussing finances in their children's presence. Due to the importance of the topic, our year-end campaign in 2024, like the previous year, emphasized the importance of children's financial education and family discussions about money. Our goal is to help more parents recognize the importance of financial education and provide specific guidance to support them. The campaign highlighted the topic's importance and provided specific tips for parents on the @website, social media content, newspaper articles, and podcast discussions.

Our series "Finance Made Simple", launched in collaboration with RTL's online platform and Bank360, continued in 2024. In the videos, OTP Bank and Bank360 experts discuss and propose solutions to financial questions arising from typical life situations

The bank also aims to build financial awareness on its social media platforms. In addition to existing social media channels, we launched two new channels (Instagram, TikTok) in 2024, focusing on this topic. We regularly share content on everyday banking and financial products and services, with special attention to data security.

In 2024, OTP Bank's branch locator on the website was updated to provide more accurate results and display services and other information, including accessibility conditions, in a clear and filterable manner.

We plan to implement the Financial Education Strategy, define goals, quantify them, and plan and launch developments and activities by 2025.

DSK Bank regularly publishes financial educational articles, training materials, and videos on the "DSK Helps" website and YouTube channel. They organize annual campaigns to promote the use of electronic channels. For example, many elderly customers find it challenging to pay at POS terminals, thinking it is costly or unsafe. The Meta campaign targeted them and their children, who can explain the details to their parents. They created an information booklet for retirees on using ATMs, card payments, and savings options.

The Slovenian subsidiary offers financial literacy programs for customers, with videos and various useful information on their website: @Vsi smo lahko Bogatajevi | OTP banka. The 2023 videos present basic financial knowledge and tips through the life of an imaginary Slovenian family. They also provide useful advice and information for vulnerable groups (flyers in branches and online at @Finančna pismenost | OTP banka).

OTP Bank Croatia participates in initiatives by the Croatian Banking Association aimed at promoting responsible financial behaviour among customers. Additionally, they publish tips and rules for safe online shopping on their website and social media channels.

OTP Bank Serbia's branch staff support customers in expanding their knowledge of products, mobile applications, bank cards, ATMs, and other digital channels. To teach more customers to use digital services independently, they organize special events, with administrative staff also assisting in knowledge transfer in branches.

Ipoteka Bank regularly publishes video content on financial knowledge on social media platforms. They also actively participate in initiatives like Global Money Week and Cybersecurity Awareness Month.

To encourage transactions through digital channels, they launched a pilot project in six branches, equipping Meeter Greeter staff with comprehensive toolkits (e.g., dialogue scripts, detailed process descriptions, and special badges) to help less digitally skilled customers transition to digital platforms.

The Ukrainian subsidiary published consumer information materials from the National Bank of Ukraine (e.g., on "#FinancialCybersecurity" and "Know Your Rights: Insurance") on their website and social media channels. OTP Bank Ukraine supported the UCulture team for six months in creating a lecture series on Ukrainian financial history. All recorded video materials are publicly available on the bank's YouTube channel and the UCulture website.

The Montenegrin subsidiary publishes financial educational materials on their website and social media. The subsidiary typically posts graphic materials and short videos on social media, and articles and guides on the website.

In 2024, they introduced the Meeter Greeter position in three branches, responsible for welcoming customers and demonstrating digital products, especially for older customers. This includes explaining the use of ATMs and bank cards, as well as activating and demonstrating the CKB GO mobile application. They plan to introduce this position in more branches in 2025. Throughout the year, they conducted targeted campaigns to promote digital services, offering cash incentives or cashback. The digital platforms support multiple languages to serve a diverse customer base. The website and mobile application include step-by-step tutorials and guides to help customers learn to use digital services.

The Albanian subsidiary participated in the Albanian Banking Association's financial education campaign and the state financial culture campaign. They also organized a year-long project providing advice and tips on financial literacy and education as their initiative.

The Russian subsidiary tested a "stories" feature in the mobile application to increase customer knowledge about new offers and changes.

Clarity

In 2024, several Group members implemented developments to improve the clarity of financial services.

At OTP Bank, texts for retail customers are written and edited by the Service Design Group colleagues based on customer-centricity and clarity. The goal is to improve text clarity (clarity of information and tasks, structure, transparency, relevance) and ensure that texts align with the requirements outlined in the Tone of Voice Handbook.

The Croatian subsidiary worked on introducing a new content management system in 2024, emphasizing clear communication and removing banking jargon from texts. They collaborated with an NMC (non-marketing communication) company specializing in this area. Workshops were held with all content owners on clear and simple wording.

The Serbian subsidiary's communication strategy includes providing accurate, transparent information in a way that is easily understandable for the average person. Knowing that legal and regulatory provisions are often complex to understand during customer communication, the bank strives to simplify the content's essence. Communication materials are visually tailored to target groups for better understanding. They use graphical representations to simplify financial presentations and developed a personal financial manager within the mobile application to help customers manage their budgets transparently. They increasingly use video format to present their products and services.

The Uzbek subsidiary uses simple and clear language in its materials, avoiding banking jargon. They provide clear and detailed information on all products, highlighting key benefits and potential risks. Ipoteka Bank develops sample dialogue scripts for front-office staff, guiding consistent, polite, and knowledgeable information provision and advice.

The Montenegrin subsidiary's customer experience team regularly visits branches to discuss the best ways to welcome customers, approach different situations, and provide accurate and useful information. To continuously improve communication, they actively seek and incorporate customer feedback.

In 2024, they introduced the SQM system, which tracks and measures customer satisfaction by branches, products, and employees. The bank offers various communication options for customers to get direct information. Customer service has expanded to include video calls and live chat, in addition to phone calls, international calls, and email communication.

The Russian subsidiary conducts training for employees to explain complex financial issues clearly. They continuously improve customer documents, simplify complex terms, and replace banking jargon to make information easily understandable. All key conditions for products and services are presented clearly and structured, with references to sections where detailed conditions can be found.

They collect customer feedback and adapt communication based on needs.

For legal proceedings related to violations of marketing communication and information provision rules see @G1-4.

Targets
ESRS S4-5

We will set comprehensive, measurable goals for quality information based on the Financial Education Strategy, first at the parent bank and then extending to the group level, focusing on:

- increasing the number of customers who navigate finances confidently and consciously
- ensuring customers have a product portfolio that supports their individual goals
- improving the positive brand impact and perception of OTP Bank

The quantification and operationalization of goals will take place in the future. We did not measure the effectiveness of policies and measures related to quality information in 2024.

3.3.3 Access to Financial Products and Services

Policies
ESRS S4-1

The principles of access to products and services are also defined in the **Compliance Policy** (see detailed presentation in @G1-1), with the provision that the Banking Group ensures ethical and consumer protection principles and regulations in product development and service accessibility, providing modern, high-quality, and fair services that meet customer needs.

Accessibility Strategy

Key content: In accordance with legal requirements, OTP Bank has an Accessibility Strategy and internal regulations for serving customers with disabilities. The strategy presents the methodology of needs assessments conducted among customers with disabilities, describes the main measures and results achieved since 2007 to ensure equal access for these customers, and sets goals for the next two years. The strategy is regularly reviewed, most recently in 2023.
Scope: The strategy applies to OTP Bank, and the document "Group Recommendation for Compliance with Accessibility Expectations" assists subsidiaries in achieving accessibility.
Accountable for implementation: The strategy was adopted by the Management Committee, and the Deputy CEO of the Retail Division is responsible for its implementation.
Availability: Branch staff learn about the strategy's content through mandatory training, while colleagues not directly interacting with customers can participate in voluntary training.
Consideration of the interests of key stakeholders: The strategy is based on needs assessments conducted among customers with disabilities.
Reference to third-party standards: The strategy complies with the Hpt.[100], the Accessibility Act[101], and NGM Decree 22/2016 (VI. 29.)[101].

Actions
ESRS S4-4

Accessibility

OTP Group continuously improves the accessibility of its infrastructure. To comply with the European Accessibility Directive[103] by the 2025 deadline, OTP Bank and the Slovenian subsidiary have implemented several measures in both physical and digital accessibility.[104]

Physical Accessibility

By the end of 2024, OTP Group branches and ATMs largely ensured access for customers with mobility impairments.

To support customers with mobility impairments:

- 1,110 branches are accessible to customers with mobility impairments (all branches in Hungary except one heritage branch, over 70% of branches in Bulgaria, Slovenia, Croatia, Ukraine, and Montenegro, and over 25% of branches in Serbia, Uzbekistan, Moldova, and Russia). In Hungary, branches where wheelchair access is only possible with a mobile ramp have installed a disability bell for customers to signal the need for assistance.
- 2,730 ATMs are accessible to customers with mobility impairments (all ATMs in Croatia and Russia, and some ATMs in Hungary, Slovenia, Serbia, Ukraine, Albania and Moldova)

[100] Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises
[101] Act XVII of 2022 on the General Rules of Compliance with Accessibility Requirements for Products and Services
[102] Decree 22/2016 (VI. 29.) of the Ministry for National Economy on the rules prescribing equal access to financial services for persons with disabilities in credit institutions.
[103] Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services
[104] The relevant national legislation has not yet been adopted in Bulgaria and Croatia.

To support customers with visual impairments:

- 386 branches have tactile guide paths (in some branches in Hungary and Russia and one branch in Croatia).
- 444 branches have customer call devices with physical buttons featuring Braille to help visually impaired customers request assistance from staff (in some branches in Hungary, Bulgaria, and Croatia).
- 3,361 ATMs have Braille labels (in Hungary, Slovenia, Serbia, Uzbekistan, Ukraine, Moldova and Russia), of which 1,411 ATMs are fully accessible for the visually impaired in Hungary. These ATMs are equipped with headphone jacks that provide narration through headphones during transactions, and the screen can be completely darkened during such transactions.

To support deaf and hard-of-hearing customers:

- 342 branches are equipped with induction loop devices, which help the hard-of-hearing by providing support through headphones and amplifying the staff's voice for those with hearing aids (in all branches in Hungary and Croatia).
- 341 branches are equipped with sign language interpreter tablets, offering sign language interpretation services supported by SINOSZ (Hungarian Association of the Deaf and Hard of Hearing) (in all branches in Hungary and some branches in Serbia).
- 64 branches have staff who speak sign language (in some branches in Hungary and Serbia).

Accessibility of branches and ATMs in OTP Group:

	Branches	ATM
Proportion of accessible access points for people with mobility impairments	76%	49%
Proportion of accessible access points for the blind and visually impaired	27%	25%
Proportion of branches accessible to the hearing impaired	22%	-

OTP Bank collaborates with relevant advocacy organizations, such as SINOSZ, to provide sign language interpretation services and with the Hungarian Federation of the Blind and Partially Sighted (MVGYOSZ), remaining open to their service development suggestions. The bank informs customers about accessibility measures on its @website. Additionally, the branch locator on the @website OTP Bank provides information under the "Accessibility Information" section about the solutions available for customers with mobility, visual, or hearing impairments at each branch.

Key developments in 2024:
OTP Bank installed tactile guide paths in 151 branches, sign language interpreter tablets in 171 branches, and induction loops in every branches. Over 100 accessible ATMs were also deployed. The related internal online training was renewed, and all branch network employees completed it by September 2024. The training is mandatory for all new employees.
DSK Bank purchased all new ATMs with modules for connecting external headphones, deploying about 30 such machines in 2024.
The Slovenian subsidiary conducted accessibility assessments for all branches and began renovation work. They are introducing keyboard adjustments for ATMs (highlighting the middle key and the top left key) in line with renovation possibilities and replacements. Text-to-speech solutions will be introduced on Bankart-provided ATMs in 2025. Guidelines and instructions for working with vulnerable customers were prepared for employees.
The Croatian subsidiary installed 13 new induction loop devices in 2024. Induction loops will be standard equipment in all renovated branches.
The bank started collaborating with the digital startup Inclusio (inclusio.rs), which helps people with disabilities access public places like banks,

post offices, and shops. It notifies employees at these locations about the person's arrival and provides information about their issue and the type of assistance needed.
In 2024, OTP Bank Ukraine conducted technical assessments for physical accessibility in 21 branches.
CKB Bank employees received training on assisting individuals with special needs, and clear signs and directions were placed to help customers navigate branches easily.
The Russian subsidiary installed ramps, yellow circles on doors, yellow stripes, and tactile paving for customers with mobility impairments. They updated training materials for employees.

Digital Accessibility

The accessibility of websites and digital platforms is also part of compliance with the EU directive.
By the end of 2024, the websites of OTP Bank, DSK Bank, and the Croatian, Serbian, Uzbek, and Russian subsidiaries, as well as the internet banking and applications of OTP Bank and the Croatian, Serbian, and Russian subsidiaries, were partially accessible.
During the design and development of websites and applications for OTP Bank and Hungarian subsidiaries with retail websites and/or applications, and during content editing activities, we considered the WCAG 2.1 "A" (and in some cases "AA") level recommendations, supporting navigation with alternative tools and the use of screen readers. Comprehensive accessibility testing is planned for the first half of 2025. Full accessibility of internet banking and mobile banking is also in progress, to be completed in 2025.
The Slovenian subsidiary launched a project to make digital channels accessible according to WCAG 2.2.
From 2024, built-in browser tools are available on the website for individuals with special needs. Texts for those with mental disorders were supplemented with short formulations and non-textual elements (simple and clear images, diagrams).
For legal proceedings related to violations of accessibility rules, see @G1-4.

Access points in low populated or economically disadvantaged areas by type

GRI G4: FS13 Due to its extensive branch network, OTP Group provides significant accessibility for personal financial management in disadvantaged areas in several countries. However, branch and ATM density is lower in these areas. Only some group members have information about competitors in these areas.[105]
The Bulgarian, Serbian, and Russian bank networks are roughly equivalent to other banks in these areas, with the Bulgarian ATM network being denser than competitors.
The Croatian bank's access points are sparser in both disadvantaged and non-disadvantaged areas compared to competitors. The Ukrainian bank has two branches in low-density areas, important for providing financial services to Hungarian-speaking customers. The Uzbek bank is present in all regions of the country, with a stronger presence in densely populated areas compared to competitors.

[105] In Slovenia, and Moldova, disadvantaged regions cannot be identified.

Access points in disadvantaged areas*:

	Branches		ATMs	
OTP Bank – Hungary**				
Access points – pcs (% of total access points)	57	(18%)	197	(10%)
New access points – pcs (in % of new ones)	0	(0%)	11	(12%)
Access points terminated – pcs (% of total terminated)	6	(24%)	8	(22%)
Change from previous year (%)	(10)%		+2%	
DSK Bank – Bulgaria				
Access points – pcs (% of total access points)	47	(18%)	170	(18%)
New access points – pcs (in % of new ones)	0	(0%)	7	(21%)
Access points terminated – pcs (% of total terminated)	1	(5%)	5	(10%)
Change from previous year %***	N/A		N/A	
OTP Bank Slovenia				
N/A – no disadvantaged areas defined				
OTP Bank Croatia				
Access points – pcs (% of total access points)	9	(9%)	30	(7%)
New access points – pcs (in % of new ones)	0	N/A	1	(7%)
Access points terminated – pcs (% of total terminated)	1	(50%)	0	(0%)
Change from previous year (%)	(53)%		+7%	
OTP Bank Serbia				
Access points – pcs (% of total access points)	8	(5%)	38	(13%)
New access points – pcs (in % of new ones)	0	(0%)	0	(0%)
Access points terminated – pcs (% of total terminated)	0	(0%)	0	(0%)
Change from previous year (%)	0%		(3)%	
OTP Bank Albania				
Access points – pcs (% of total access points)	6	(12%)	22	(14%)
New access points – pcs (in % of new ones)	0	(0%)	2	(40%)
Access points terminated – pcs (% of total terminated)	0	(0%)	2	(33%)
Change from previous year (%)3	N/A		N/A	
CKB – Montenegro				
Access points – pcs (% of total access points)	0	(0%)	15	(14%)
New access points – pcs (in % of new ones)	0	(0%)	0	N/A
Access points terminated – pcs (% of total terminated)	0	(0%)	0	(0%)
Change from previous year (%)	N/A		0%	
Ipoteka Bank – Uzbekistan				
Access points – pcs (% of total access points)	0	(0%)	0	(0%)
New access points – pcs (in % of new ones)	0	(0%)	0	(0%)
Access points terminated – pcs (% of total terminated)	0	(0%)	0	(0%)
Change from previous year (%)	N/A		N/A	
OTP Bank Russia				
Access points – pcs (% of total access points)	5	(6%)	5	(4%)
New access points – pcs (in % of new ones)	0	(0%)	0	(0%)
Access points terminated – pcs (% of total terminated)	0	(N/A)	3	(8%)
Change from previous year (%)	0%		0%	
OTP Bank Ukraine				
Access points – pcs (% of total access points)	2	(3%)	40	(23%)
New access points – pcs (in % of new ones)	0	N/A	5	(31%)
Access points terminated – pcs (% of total terminated)	0	(0%)	0	(0%)
Change from previous year (%)	0%		+60%	
OTP Bank Moldova				
N/A – no disadvantaged areas defined (based on changed methodology)				

* Micro-regions/districts defined by social, demographic, housing and living conditions, local economy and labor market, as well as infrastructure and environmental indicators, which are defined as such by the legislation of the given country (@S4).

** OTP Merkantil branches are not present in disadvantaged areas.

*** There were no disadvantaged areas defined last year.

Mobile Bank

In March 2024, the first OTP Mobile Bank Branch was launched in Hungary, providing personal service in towns without a bank branch.
By the end of 2024, three mobile buses were operating across the country. The Mobile Bank Branch is a specially designed vehicle with two workstations, allowing us to serve two customers simultaneously in a comfortable, modern, and discreet environment similar to our branches. The workstations have access to live banking systems, enabling us to offer comprehensive services primarily to our retail customers.

Social Lab

Our new initiative, OTP Group Social Lab, aims to maximize the impact of social projects aligned with OTP Bank's commitments under the UN "Principles for Responsible Banking" framework, specifically in the Financial Health & Inclusion impact area.

During the concept development, we established a standardized methodology for Social Lab's social sustainability projects, with the following main stages:

1. Identifying social challenges: Mapping, prioritizing challenges, and defining an impact area for the project
2. Problem definition: Identifying the problem space within the selected social challenge through exploration/research and selecting a well-defined problem
3. Solution alternatives: Mapping and prioritizing solution alternatives for the selected problem by involving relevant internal and external stakeholders. The prototype of the selected solution alternative is developed through an iterative process based on stakeholder feedback
4. Scaling: Designating the business area responsible for operating and scaling the prototype business model, which takes over operations and implements the solution's scaling

In 2024, we identified social challenges and defined problems. We prioritized solution alternatives and selected those for which we will launch test projects in 2025. The test projects will focus on disadvantaged groups and youth.

Housing Loans

The company provides housing loans on a market basis, significantly aiding home acquisition in several countries due to its market presence. At the end of 2024, OTP Group had approximately 510,000 active housing loan contracts, with about 59,000 new loans. Around 42% of these were Hungarian contracts, but DSK Bank, the Slovenian, Croatian, Serbian, Uzbek subsidiaries, and (relative to the country's size) CKB Group also had significant housing loan portfolios.[106]
In addition to market-based products, the Banking Group offers significant state-supported housing loan schemes in several countries. OTP Bank plays a prominent role in these schemes, with around 91,000 active contracts for state-subsidized Home Creation loans at the end of the year. The Croatian subsidiary had over 5,000, and Ipoteka Bank had nearly 15,000 state-supported housing loans.

Preventing Over-Indebtedness

One aspect of access to financial products is preventing customer over-indebtedness. This is ensured by the appropriate lending policy and regulatory framework within the Banking Group. Our lending regulations are based on the current lending policy, including customer and product-level lending conditions. This framework ensures that lending conditions and related obligations are transparent, clear, and understandable for new or already financed customers.
The product conditions derived from the lending policy ensure that we minimize lending risks at both product and customer levels, including the level of indebtedness. This applies equally to all our products and customers.
We continuously monitor the ratio of Stage 3 loans according to IFRS and report on it in our reports. (We do not collect separate information on loans for disadvantaged customers.)

[106] OTP Bank Russia does not offer mortgage products, and this service is not significant at OTP Bank Ukraine.

In case of market or economic changes, we intervene in the condition system to preventively enforce the prevention of increased lending risks, ensuring that our customers' and potential customers' situations and solvency do not deteriorate.

Targets
ESRS S4-5

We will define goals related to the availability and accessibility of products and services – beyond legal compliance – through the @Social Lab, and have already set goals for accessibility.

Accessibility

The European Union's Directive 2019/882 on accessibility requirements for products and services applies to OTP Group's EU subsidiaries with retail branches, websites, or digital platforms. The directive covers the accessibility of branches, ATMs, and digital platforms (websites, internet banking, mobile banking). OTP Bank aims to design and develop both physical (branch and contact center, ATM network) and digital (Mobile and InternetBank) channels to ensure that customers with disabilities can access all services and products, in line with new legal requirements.
Our goal is to equip all OTP Bank branches with tools to support customers with disabilities by June 2025, including tactile guide paths, customer call systems, sign language interpreter tablets, induction loops, mobile ramps, and disability bells. We aim to ensure that all ATMs have screen reader software and font size increase options (or use large fonts by default), expanding screen reader software functions to all available features (see @S4-4).
Our goal is to ensure that OTP Bank's website and digital channels comply with the WCAG 2.1 standard at level A.
Since 2007, the Bank has aimed for accessibility and has an Accessibility Strategy. The strategy is regularly reviewed and fine-tuned, with developments aligned with it and legal changes.
To develop and improve appropriate service processes, the Bank maintains regular contact with relevant advocacy organizations (see @S4-4).
We continuously monitor the implementation of supportive tools for accessibility, maintaining the current status in the Branch Unified Master Database. We also continuously monitor the completion of internal training to develop staff sensitivity and preparedness according to our standard training processes.
The Ukrainian subsidiary aims to make 5 more branches accessible in 2025.

3.4 Reporting policy for heading S4

S4-3 AR23 The amount of compensation does not include refunds for transactions.
GRI 418-1 Number of confirmed cases of misuse of customer personal information in the organization's sphere of interest. Each case is included for only one type, there is no overlap between the types.
Bank branch: A branch is a physical outlet where customers can get human assistance and at least daily banking services are available (in addition to cash and transit services).
ATM: a device that allows at least automatic withdrawals.
S4-4 31a Accessibility data refers to all branches and ATMs in countries.
Accessible drawers for disabled people: accessible part open to the public, safe to leave in case of emergency, and objects and equipment can be used in the building as intended.
Bank branch with guide lane: Guide Lane: A strip placed on the floor of a branch to help blind and partially sighted customers navigate within the branch.
Physical push button on the call ticket: Braille-labeled physical button on the caller.
Induction loop: induction signal amplifier/audio frequency loop amplification system. The induction loop was developed to make sound information more understandable to people with hearing impairments, enabling them to absorb and understand it without problems.
Sign interpreter: Sign language interpreters, or sign interpreters for short, mediate between hearers who do not know sign language and those who are deaf or hard of hearing. Not only

is speech translated into signing, but also, if necessary, signage into speech. For people with communication difficulties, sign language interpretation services use articulation interpretation services to ensure their understanding of communication situations in everyday life. A sign interpreter enables communication using a multimedia device.
Sign Language Associate: The agent uses basic sign language to establish contact with deaf and hard of hearing customers.
Total Accessible Accounts: The number of accounts where one of the previous three options is available, counting only once for accounts with multiple options.
Total number of hearing-impaired accessible accounts: the number of accounts where one of the previous three options is available, counting only once the number of accounts where more than one option is available.
ATM accessible for disabled people: accessible, open to the public part can be accessed, safely left in an emergency, and objects and equipment can be used in the building for their intended purpose.
GRI G4: FS13 Branch and ATM definition see S4-4 31a: Accessibility of branches and ATMs in OTP Group. Total amount and percentage of access points in sparsely populated or economically disadvantaged areas by country and type (branch/ATM). These areas were defined differently from country to country. The definition of these areas varies from country to country. In Hungary, the so-called districts to be developed are defined by the Government Decree 290/2014 (XI. 26.).
In Bulgaria, the "a" areas defined by the EU regional aid maps. In Croatia, areas defined by the Law on Special State Care Areas.
In Serbia, municipalities with less than 12,000 inhabitants. In Uzbekistan, areas with lower than average population density as defined by Decree No 98 of the President of the Republic of Uzbekistan. In Ukraine, municipalities with a population of less than 50,000 inhabitants.
In Montenegro, the northern, agriculturally oriented areas of the country. In Albania, areas with a low population density as defined by the Albanian Statistical Office, LAU2 (Local Administrative Units level 2). In Russia, municipalities with a population of less than 50,000 inhabitants.

4. Governance Information

4.1 Corporate Governance

For OTP Group, transparent operations and ethical business conduct are of paramount importance. Ensuring legal compliance, reducing risks, and effectively enforcing business, ethical, and internal controls are key objectives. Adhering to ethical norms and principles not only ensures legal compliance but also fosters trust, cooperation, and fair behaviour within the organization. The corporate culture of the Banking Group is characterized by long-term thinking and responsible attitudes, striving for sustainability. At the same time, OTP Bank is mindful of its legal obligation to ensure the profitable operation of OTP Bank and OTP Group for the benefit of its depositors, shareholders, and investors. These two aspects must be balanced and interact with each other.

During the operation of the corporate group, special attention is paid to transparency, regulation, the definition of internal responsibilities, and thus to actual compliance with the broadest environmental, social, and regulatory expectations.
Disseminating and promoting these topics among employees is of paramount importance throughout the Banking Group. Therefore, it aims to familiarize and encourage employees to comply with them through the following means: intranet news and articles, branch knowledge management, international conferences, e-learning training, and a network of compliance officers.
The place where the impacts and risks arise is the entire OTP Group, its own operations, with the exception of the fight against money laundering, which is essential for the Group's banks.

Material subtopic	Type of impact, risk, opportunity	Description of impact, risk, opportunity
Corporate culture, compliance, fight against money laundering	positive impact	The implementation of ethical business conduct and ensuring legal operations are of paramount importance to OTP Group. Preventing money laundering attempts by customers has a significant positive impact on society.
	negative impact	Non-conformities cannot be completely eliminated even with care-ful behaviour.
	financial risk	Non-compliance with regulations can result in fines and reputa-tional damage. Violation of anti-money laundering regulations also poses a financial risk.
Corruption and bribery	positive impact	Effective prevention of corruption brings important social benefits.
	negative impact	Even with careful and continuously evolving practices, abuse can occur.

For a more detailed description of impacts, risks and opportunities and their management, see @SBM-3 and the following sections of this chapter.

Policies on Corporate Culture and Business Conduct[107]

ESRS G1-1

The two most defining policies of OTP Group regarding corporate culture and business conduct are the Code of Ethics and the Compliance Policy. The Code of Ethics includes the Gift Policy as an appendix. The Compliance Policy includes the Sanctions Policy, the Anti-Corruption Policy, and the Anti-Money Laundering and Counter-Terrorism Financing Policy. The most important policies of OTP Group, or their extracts, are publicly available on the OTP Bank website @Due Diligence information.

Code of Ethics

Key content: OTP Bank adopted its group-level Code of Ethics in 2006, which continuously evolves in line with external and internal changes and expectations. The Code of Ethics of OTP Bank and OTP Group sets out clear and unambiguous guidelines and expectations for ethical business conduct for the entire OTP Group and those associated with it, to protect the values of OTP Group. The Code of Ethics defines behavioural expectations for employees, outlines the business ethical commitments of OTP Group, and details the reporting method expected in case of violations of the Code of Ethics. It is a fundamental expectation for all employees of OTP Group to perform their work in full compliance with moral and professional standards. Familiarity with the Code of Ethics and tracking changes is also a fundamental expectation for all employees and business partners.

The Code of Ethics also includes provisions on gifts and corruption prevention. The Gift Policy, which details the rules, restrictions, monetary limits, and prohibitions on gifts and invitations, and the method of record-keeping, is an appendix to the Code. The Code declares the corporate group's commitment to environmental sustainability and environmental values. The Code did not change significantly in 2024.

Scope: The Code of Ethics applies to the entire OTP Group, imposing obligations on executives, employees, and agents.[108]

Accountable for implementation: The Board of Directors and the Supervisory Board bear the governance and organizational responsibility for compliance, including the Code of Ethics.

Availability: Familiarity with the Code is ensured through mandatory training and is also available in the internal regulatory repository and on the Bank's @website. The Gift Policy is only available in the internal regulatory repository.

Consideration of the interests of key stakeholders: The organizational units of the Banking Group, as the most important stakeholders, reviewed and shared their comments and

[107] The G1-1 disclosure requirement expects the presentation of information related to promoting corporate culture, in addition to policies. We consider these as measures and objectives according to the ESRS.

[108] Agents: those who fulfill contractual obligations for OTP Group and, in the course of their activities, interact with a wide range of OTP Group's clients or potential clients, provide services on behalf of OTP Group, and clearly appear as representatives of OTP Group in public while fulfilling their contractual obligations. This includes temporary employees and individual contractors supplying labour to the undertaking, as defined by the ESRS.

suggestions during the creation of the Code of Ethics and related regulations.

Reference to third-party standards: The Code of Ethics is based on international standards, best practices, and operational experiences that consider the expectations and practical feasibility for OTP Group members. These include the International Code of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the core conventions of the International Labour Organization (ILO), and the UN Guiding Principles on Business and Human Rights.

To ensure uniform application, the group-level Code serves as the basis for local regulations for all subsidiaries and some affiliates of OTP Group, considering possible deviations due to national characteristics or specific regulatory environments. The list of external guidelines and relevant legislation underlying the Code of Ethics is included in the @Documents governing the application of the Code of Ethics of OTP Bank and OTP Group.

Code of Ethics for Partners

Key content and scope: OTP Group expects its partners to adhere to the principles of the Code of Ethics. Therefore, in addition to the Code of Ethics, there is also a group-level Partner Code of Ethics. This Code aims to set out clear and unambiguous guidelines and expectations for ethical business conduct for those associated with OTP Group. OTP Group strives to ensure that all its suppliers, business, agents, and other contractual partners commit to complying with the provisions of the Code of Ethics or the Partner Code of Ethics (or their equivalent regulations) by accepting the General Terms and Conditions, a separate contractual provision, or a declaration of acceptance.

Availability: The Code is part of the General Terms and Conditions and is also publicly available on OTP Bank's @website.

In other aspects, the Partner Code of Ethics is identical to the Code of Ethics.

Compliance Policy

Key content: The purpose of the Compliance Policy is to summarize the principles related to the compliance of OTP Bank, designate the main directions of independent compliance activities, which collectively define, promote, and support proper, legal, safe, and prudent operation, based on the expectations and guidelines formulated by senior management, considering applicable laws, regulatory guidelines, and internal regulations. The Compliance Policy defines the principles for operating the compliance function. The Policy is guiding and to be followed by OTP Group members. Each group member creates its own (local group-level) compliance policy and develops the regulations and tools to ensure its implementation, based on the principles of the Bank's Policy, adapted to the complexity of their activities and the differences in their size, and in the case of foreign group members, the laws of the respective country.

The Compliance Policy requires the Bank to develop ethical norms and internal professional standards, summarized in the Code of Ethics and the Partner Code of Ethics. The principles of corporate governance (responsible corporate management) also appear in the Compliance Policy. In line with responsible corporate governance, the Bank applies guidelines that promote compliance with internationally recognized rules and standards of responsible corporate management, ensuring transparency and accountability through the public disclosure of information related to its management and operations.

In line with OTP Group's geographical presence, markets, business, and customer relationships, a sanctions compliance policy is applied to ensure compliance with economic, financial, and trade sanctions imposed by the European Union, the United Nations Security Council, the relevant office of the United Kingdom, and the United States. Additionally, local laws and national sanctions applicable to individual group members are also considered. OTP Group has a unified Sanctions Compliance Policy and sanctions procedures that set minimum requirements for OTP Bank and its affected subsidiaries. The applicable sanctions may restrict OTP Group's business activities with certain sanctioned countries, individuals, and organizations. In line with its sanctions compliance policy, OTP Group prohibits or restricts involvement in business activities, financial, investment services, or products that may violate applicable sanctions regulations. The prohibitions also aim to prevent participation in transactions and business behaviours that may directly or indirectly circumvent or evade applicable sanctions.

OTP Group has policies, procedures, and numerous monitoring measures to ensure compliance with relevant sanctions regulations. Accordingly, customers and financial transactions must be screened against sanctions lists, including but not limited to those of the European Union, the United Nations, the United Kingdom, and the United States, as well as national sanctions lists applicable to the respective Group member. In addition to screening customers and financial transactions, OTP Group has introduced further processes for active banking transactions with sanctions/sensitive involvement, where each identified transaction is separately evaluated by examining relevant factors.

The Bank also publishes a group-level policy on financing services related to the defense industry on its website, which is also part of the Compliance Policy.

Scope: The Compliance Policy applies to the entire Bank, all organizational units, and activities. The Compliance Policy is applied at the group level, as it is guiding and to be followed by the Banking Group members. The Sanctions Compliance Policy is a group-level document.

Accountable for implementation: The Board of Directors and the Supervisory Board bear the governance and organizational responsibility for compliance, including the entire Compliance Policy.

Availability: The Compliance Policy is available in the internal regulatory repository and on the Bank's @website, as is the @Sanctions Compliance Policy.

Consideration of the interests of key stakeholders: The Bank's organizational units reviewed the policy during its creation.

Reference to third-party standards: The Bank establishes and operates internal defense and security lines based on the main principles and requirements defined by the MNB Recommendation, which promote the organization's prudent, reliable, and efficient operation in compliance with laws and internal regulations. This is in line with the guidelines of European financial supervisory authorities and the recommendations of international financial regulatory bodies. Additionally, the Compliance Policy refers to numerous legal requirements. The main content of the Sanctions Compliance Policy has been detailed above.

Anti-Money Laundering and Counter-Terrorism Financing Policy

Key content: The goal of the Banking Group's anti-money laundering and counter-terrorism financing activities is to effectively prevent and combat the laundering of assets derived from criminal activities and the financing of terrorism. The policy includes that the corporate group prepares a group-level risk assessment for combating money laundering and terrorism financing, which is reviewed at least annually, to identify, analyze, evaluate, and manage money laundering and terrorism financing risks. Furthermore, it categorizes its customers into risk categories and applies customer due diligence measures appropriate to the risk category. During customer due diligence, the "Know your customer" principle is applied to create a customer profile and screen suspicious transactions that do not fit the customer profile, reporting to the financial intelligence unit (FIU) if necessary. AML/CFT requirements are mandatory at the group level. Deviations are only possible with the parent bank's permission due to local legal requirements, supervisory expectations, and recommendations.

Scope: According to the policy's provisions, OTP Bank defines the group-level requirements, procedures, and workflows related to AML/CFT activities.

Availability: The policy is available in the internal regulatory repository and on the Bank's @website.

Reference to third-party standards: The policy is designed to comply with the internal regulations governing the prevention and combating of money laundering and terrorism financing, as well as the financial and asset restrictive measures imposed by the European Union and the United Nations Security Council, and the relevant sections of the General Business Rules. In terms of other features, the policy is identical to the Compliance Policy.

Anti-Corruption Policy

Key content: OTP Group is committed to fighting corruption and has declared zero tolerance for bribery and all forms of illicit advantage. The policy aims to define the principles of OTP Group's anti-corruption activities, identify areas particularly exposed to the risk of corruption, and serve as a fundamental document for the Banking Group's anti-corruption activities in developing the necessary regulatory documents and during the anti-corruption activities of the affected employees. The provisions of the policy are to be applied together with the group-level Code of Ethics and Partner Code of Ethics.

Scope: The policy applies to all employees, contractual partners, and any other persons involved in the activities of the Group members. Accountable for implementation: The Board of Directors and the Supervisory Board bear the governance and organizational responsibility for compliance, including the entire Compliance Policy.

Availability: The policy is available in the internal regulatory repository and on the Bank's @website. Given the importance of anti-corruption measures in business relations, Group members pay special attention to ensuring that all employees and contractual partners are fully aware of the policy's provisions. To this end, Group members always provide free access to the policy and expect their employees and contractual partners to familiarize themselves with the document, applying an anti-corruption clause (see @G1-3). Training related to the Anti-Corruption Policy is part of the Compliance policy @training program.

Reference to third-party standards: The provisions of the Anti-Corruption Policy have been developed in accordance with the applicable domestic and international[109] anti-corruption laws and the Wolfsberg Group Anti-Corruption Guide[110].

The policy is identical to the Compliance Policy.

Actions and targets

Taking action on Corporate Culture and Compliance

Ethical Reporting System

According to the expectations of the Code of Ethics, OTP Group employees are required to draw attention to any illegal practices, violations of the rules and values outlined in the Code of Ethics, or any practices that may lead to abuse, by notifying the affected parties or their immediate supervisor. This should be done through the contact points of OTP Bank Compliance Directorate or the compliance area of the affected OTP group member.

External parties can also make ethical reports or ask questions related to the Partner Code of Ethics through the same channels.

Ethical reports can be made in person during working hours, by letter, phone, email, or through the contact points of the compliance area of the affected OTP group member, as well as through the dedicated online Reporting System. Reports can also be made anonymously. The ethical reporting system operates continuously. OTP Group handles all reports, inquiries, and investigations confidentially, in compliance with applicable laws and regulations, and with the protection of the whistleblower.

The Banking Group member sends an acknowledgment of receipt to the whistleblower within seven days of receiving a written report through the Reporting System and provides general information on the

[109] (a) United Nations Convention against Corruption (Act CXXXIV of 2005), (b) the Treaty on the Functioning of the European Union, (c) Convention drawn up on the basis of Article K.3 (2) (c) of the Treaty on European Union on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union, (d) Council Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector (e) Council Decision (EU) 2008/852/JHA of 24 October 2008 on a network of contact points against corruption, (f) Act C of 2012 on the Criminal Code, (g) Act XXV of 2023 on complaints, public interest reports and rules related to whistleblowing, or the relevant provisions of the legislation in force at any time replacing the listed legal acts.

[110] "The Wolfsberg Group – Wolfsberg Anti-Bribery and Corruption (ABC) Compliance Programme Guidance (2017)"

procedural and data processing rules under the Whistleblower Act.

The Banking Group members investigate the contents of the report as soon as possible, but no later than thirty days from the receipt of the report. The thirty-day processing period can be extended in particularly justified cases, with simultaneous notification of the whistleblower. In such cases, the whistleblower must be informed of the expected date of the investigation and the reasons for the extension. Even if extended, the investigation period cannot exceed three months. The Banking Group members inform the whistleblower in writing about the investigation or its omission and the reasons for the omission, as well as the results of the investigation. Written notification can be omitted if the Banking Group member has verbally informed the whistleblower, who has acknowledged the information.

All participants in procedures related to reports are required to act independently, fairly, impartially, and in accordance with the Code of Ethics. To ensure fair procedures, the reported person is allowed to present their position on the report, either personally or through their legal representative, and to support it with evidence.

According to the procedures for operating the ethical/violation reporting system, the head of the Ethics Department[111] decides on the closure of the first-instance procedure based on the investigation report, determining whether there was a violation of the law and/or the provisions of OTP Group Code of Ethics, and may propose measures to remedy the violation/ethical norm violation, or to take measures to avoid, prevent, and reduce the risks of violations or breaches of the Code of Ethics. If the affected party (the whistleblower or the person affected by the report) disagrees with the results of the investigation (first-instance procedure), they can appeal in writing to the Ethics Committee, as the second-instance body, within 15 days of receiving the notification, through the reporting channels.

If required by law, the Ethics Department initiates the procedure of the competent authority under the conditions specified therein.

If a criminal complaint appears justified, it should be made in consultation with the Security Directorate, which is responsible for official contacts in criminal matters.

The head of the Ethics Department immediately notifies the head of the President-CEO organization and the Supervisory Board if the report concerns the Bank's senior executives or senior managers; the first executives of Hungarian or foreign subsidiaries; or if it concerns the activities of the Compliance Directorate.

In the framework of an ethical procedure, incidents, including cases of corruption and bribery, can be immediately, independently, and objectively investigated outside the reporting system. If such a report is received by the complaint handling department, it must immediately refer the matter to the Ethics Department. The Ethics Department decides on classifying the case as an ethical procedure, which is investigated as detailed above.

Ethical training

OTP Group considers it particularly important to familiarize employees with ethical norms and the ethical reporting system, and to raise awareness among them. Therefore, it conducts annual ethical training for all employees, and it is mandatory for sales agents to complete the training within a specified period from the start of their work. The training aims to enable all employees to act ethically and responsibly through the acquired knowledge, contributing to the establishment of fair and just operations within the company.

The training material provides comprehensive guidance on the ethical behaviour expected within OTP Group. The main points of the training include: ethical foundations; conflict of interest; ethical behaviour inside and outside the bank; political involvement; finances in the workplace; corruption, undue influence; mutual respect and cooperation. The training material helps understand and address the aforementioned issues, promoting ethical behaviour and decision-making through practical examples and guidelines. The Banking Group regularly reviews and monitors the understanding and adherence to ethical norms.

[111] From 1 January 2025, Integrity Department at OTP Bank; the name of the relevant class is not uniform among group members.

The role of leaders is crucial in conveying the expected behaviours, so leaders also undergo separate, annual leadership ethical training. This helps them handle any issues related to ethical questions that may arise. The main points of the training include: the importance of leading by example; leadership challenge: creating an appropriate work environment; equal treatment; managing conflicts of interest. The Code of Ethics also sets specific expectations for leaders: OTP Group leaders make every effort to ensure that employees are familiar with the rules of the Code of Ethics. It is important to create a work environment where employees feel safe and comfortable. They support employees in raising ethical questions and issues in good faith without facing any retaliation. OTP Group leaders lead by example in fully adhering to the principles of the Code of Ethics. It is particularly important for leaders to set an example in terms of appropriate tone, language, demeanour, gestures, and communication. They are responsible for maintaining a culture of ethical operation, ensuring compliance with the principles and provisions of the Code by employees, which they monitor using the lawful tools at their disposal. The expectations set out provide guidance, as the Code cannot contain comprehensive instructions for appropriate actions in all situations and circumstances.

In connection with compliance activities, the Bank provides a training program tailored to the organization's needs, ensuring appropriate participation opportunities, time frames, budgets, and resources for employees, and this is also expected of Group members. The compliance function monitors the education and training of OTP Bank employees, ensuring that all new hires receive the knowledge necessary to perform their work at a high level. Where deficiencies are identified, it supplements the knowledge or refreshes the knowledge acquired during previous training. The training plan is based on compliance risk assessment, legal obligations, and internal expectations. The plan consists of compliance orientation for new hires, as well as ad-hoc or annual refresher mandatory training for employees. The organizational units responsible for the compliance function prepare their own training materials and any related tests and determine the criteria for the participants of each training. The training materials are reviewed at least annually, and the annual training plan is modified as necessary to meet the needs identified by the compliance risk analysis and other development plans.

Taking action against Money Laundering

The main measures related to combating money laundering include the training program and the operation of the whistleblowing system.

Enhancing AML/CFT Awareness

To increase the AML/CFT awareness of the Banking Group's affected employees, regular (at least annual) mandatory training sessions are held. The AML/CFT training is conducted in two ways by the Banking Group's banks[112]. For some subsidiaries, the training is mandatory for all employees, while for others, it is mandatory for those involved in AML/CFT-related activities during the bank's business operations and those who interact with customers, as well as their managers. The training is typically conducted online, but there are also instances of in-person training. The training topics usually include an overview of the regulatory environment, current updates, and case studies. The training concludes with a test. The training is mandatory for all employees at DSK Bank, OTP Bank Slovenia, Ipoteka Bank, OTP Bank Ukraine, OTP Bank Albania, OTP Bank Moldova, and OTP Bank Russia.

In Hungary (OTP Bank and Merkantil Bank), training is provided to those involved in AML/CFT-related activities during the Bank's business operations and those who interact with customers, as well as their managers, based on the requirements of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing (the AML/CFT Act) and the Hungarian National Bank (MNB) regulation. OTP Bank ensures that its managers

[112] The topic is relevant at the banks of the Banking Group, and the trainings are also presented in this area.

and employees involved in the prevention and combating of money laundering and terrorism financing receive the necessary depth of preventive training and at least annual refresher training (together: general training) and take a written exam (including exams conducted in an electronic system). The Bank provides more detailed specialized training at least once a year for employees who interact with customers. Merkantil Bank's annual training is conducted in e-learning format and concludes with an online exam.

OTP Bank Serbia complies with the Serbian Anti-Money Laundering Act regarding training, which is mandatory for those establishing business relationships with customers and conducting transactions.

The Croatian subsidiary also follows legal requirements, with training provided to employees who interact with customers and senior management.

CKB Montenegro has identified employees and senior executives exposed to AML/CFT risks (those directly or indirectly interacting with customers, transaction executors, compliance, internal audit, security, operational risk management employees, senior management, and the Supervisory Board) and they receive training.

At the Romanian subsidiary, training was mandatory for employees responsible for or involved in AML/CFT or KYC (Know Your Customer) processes.

To expand employees' AML knowledge, the Banking Group also shares information on properly conducted customer due diligence, thorough customer knowledge, and behaviours indicative of AML suspicion (e.g., strawman suspicion, unjustified cash use) on internal banking forums (intranet, professional newsletter) according to current trends.

AML Whistleblowing System

OTP Bank operates a whistleblowing system for reporting illegal activities related to the prevention and combating of money laundering and terrorism financing. If OTP Bank violates the Anti-Money Laundering and Counter-Terrorism Financing Act (the AML/CFT Act), employees can send anonymous notifications through the whistleblowing system operated for this purpose. The investigation is conducted within thirty days by an employee designated by the head of the Compliance Directorate for reports involving the Anti-Money Laundering and Counter-Terrorism Financing Department or its employees, and by the head of the Anti-Money Laundering and Counter-Terrorism Financing Department or an employee designated by them in other cases. The designated person prepares a report on the investigation results, including action proposals, deadlines, and responsible persons. The head of the Compliance Directorate approves the report on the investigation results and ensures the proper implementation of its contents. If justified by the investigation results, the designated person immediately reports to the competent authorities. The whistleblowing system operates continuously.

Taking action against Corruption

OTP Group's anti-corruption measures include the anti-corruption training system, which is part of the Ethical training (see the same disclosure requirement above). Risk assessments and anti-corruption investigations, presented in the @G1-3 disclosure, also support the fight against corruption.

Prevention and Detection of Corruption and Bribery[113]
ESRS G1-3

The @Anti-corruption Policy and the @Compliance Policy stipulate that OTP Bank must strive to include an **anti-corruption clause** in all contractual relationships and regulatory documents. This clause requires parties to act carefully and minimize corruption risks during cooperation with contractual partners, especially in the tendering and preparation process. Deviation from the anti-corruption clause is only allowed in exceptional cases, based on the individual assessment

[113] We consider this disclosure requirement to be an action under the ESRS.

of the contracting department, with the contracting department assuming the risk and responsibility. The deviation or omission of the anti-corruption clause must be reported to the compliance area with justification. The extension of the clause's application to group members is planned gradually in 2025. The organizational units or activities of group members that may be affected by corruption risks vary. The @Anti-corruption Policy lists the activities most exposed to corruption risks: handling gifts and representation expenses; charity and sponsorship; contact with contractual partners; undertaking contractual obligations; investments, asset purchases, management, maintenance; hiring new employees; purchasing, managing, selling real estate. It also states that the Banking Group shall pay attention to all activities not listed that carry corruption risks.

Group members determine the organizational units or activities that are the current focus of anti-corruption activities based on an annual **risk-based assessment.** Additionally, OTP Bank's Compliance area conducts anti-corruption investigations according to its own defined anti-corruption investigations, which the Bank gradually implements. This is a continuous/periodically recurring investigation with no predetermined deadline. The plan includes examining areas with increased corruption risks, such as supplier or agent activities.

To effectively enforce the provisions of the Anti-Corruption Policy, OTP Group develops detailed rules and procedures. Group members are expected to adopt anti-corruption rules, contractual provisions, implement relevant procedures, and consistently comply with them. The general training and information practices related to corruption and bribery are detailed in the @G1-1 disclosure.

Annual ethical training, which includes the topic of corruption, is mandatory for all OTP Group employees. Thus, the training programs cover 100% of employees in functions exposed to corruption and bribery risks.

To **detect** corruption and bribery, the organizational unit/person responsible for the compliance function of the affected group member monitors the implementation of the Policy in the group member's activities and its compliance with applicable laws, as well as all other relevant expectations and best business practices. If the organizational unit/person responsible for the compliance function detects or receives information about any anomalies or irregularities, they initiate a review of the provision, modify it if necessary, and ensure that the identified deficiency or irregularity is brought to the attention of the governing bodies. The governing bodies of group members monitor the implementation of the Policy by receiving annual reports on the fulfillment of the expectations outlined in the Policy.

Violations of the provisions of the Anti-Corruption Policy can be reported through the channels specified in the @Code of Ethics and @Partner Code of Ethics, and the investigation is conducted according to the procedures for operating the ethical/violation reporting system[114] (see @Ethical Reporting System).

According to the Banking Group's Conflict of Interest Policy, the person under investigation and the investigator are separated when handling corruption and bribery allegations and cases. It is a fundamental business interest and legal obligation of the Bank to ensure that the personal interests of its senior executives, members of its governing bodies, and employees do not conflict with the business interests and commitments of the Bank, OTP Group, and its clients.

Corruption and Bribery Cases
ESRS G1-4

No convictions of guilty of violating anti-corruption and anti-bribery laws have been made against members of OTP Group. In 2024, there were two confirmed cases of corruption and bribery at the Uzbek Ipoteka Bank, which is considered a public legal case by the bank, although the case was eventually closed under internal investigation, no decision was made by an official body. The cases were reported

[114] Complying with Section 116 of the Credit Institutions Act, as well as the internal whistleblowing reporting system under the Whistleblower Protection Act.

in the local media and were subsequently investigated. During the investigations by the official bodies, the bank decided to investigate the cases internally, using its option to do so. In both incidents, the employees concerned were held responsible and dismissed. No termination of contract with a business partner was necessary.

In the first case, a financial adviser at a bank branch accepted money for assistance with a mortgage application. The bribe was paid before the loan application was formally submitted. As a result of an internal investigation by the compliance team, the consultant's employment was terminated. In the second case, two employees of another bank branch attempted to provide assistance to a third party in connection with a mortgage loan by falsifying documents. The illegal activity took place before the third party had submitted the loan application. In this case too, the employee's employment was terminated.

Measures taken to address violations of procedures and standards related to combating corruption and bribery are detailed in @G1-3.

Legal Procedures

Above is a summary of the closed regulatory procedures and the amounts of fines paid by OTP Group members.

GRI 2-27 **Closed proceedings by authorities, and other legal procedures, fines paid, OTP Group – 2024:**

	All closed cases	Number of significant cases	All cases closed with fines	Total fine paid	Fine charged for practice applied in 2024	Fine charged for practice applied in earlier period
		pcs			HUF million	
Violation of competition rules*	3	0	3	2.1	2.1	0
Violation of consumer protection rules	256	0	55	69.3	28.5	40.8
Violation of rules on equal opportunity (own workforce)	2	0	0	0	0	0
Violation of rules on equal opportunity (not own workforce	0	0	0	0	0	0
Violation of accessibility rules	0	0	0	0	0	0
Supervisory procedures	138	3	64	584.7	572.5	12.3
Violation of IT security/Cyber security rules	0	0	0	0	0	0
Violation of taxation rules	2	0	1	0.2	0	0.1
Violation of environmental rules	1	0	1	0.4	0.4	0
Violation of marketing communication rules	1	0	1	0.5	0.5	0
Violation of information provision rules	6	0	6	6.6	6.6	0
Violation of marketing communication and information provision rules	0	0	0	0	0	0
Violation of data protection rules	19	1	3	215.0	6.5	208.5
Violation of anti-corruption and anti-bribery rules	0	0	0	0	0	0
Violation of labor law rules	6	0	0	0	0	0
Violation of health and safety rules	1	0	1	0.3	0	0.3
Other proceedings	5	0	0	0.2	0.2	0
Total	**440**	**4**	**135**	**879.4**	**617.4**	**262.0**

The regulatory practices of individual countries can differ significantly, which contributes to the significant differences in the number of procedures.
* This also includes cases related to violations of antitrust and monopoly rules.

In 2024, three competition law proceedings were ongoing involving members of the Banking Group, one each against OTP Bank, Ipoteka Bank in Uzbekistan and OTP Bank of Russia. Of the three closed competition law cases, one involved Ipoteka Bank, which was fined HUF 600,000 by the Monopoly Prevention Committee for non-compliance with marketing communication rules related to microloan advertising. Two cases involved the Russian subsidiary, with fines totaling HUF 1.5 million.

Due to its significance, we present the ongoing competition law case against OTP Bank. The so-called Interchange case, a repeated procedure, began in 2021. In 2009, the Hungarian Competition Authority (GVH) fined OTP Bank HUF 281 million in the Interchange (interbank commission) case, alongside Mastercard, Visa, and several other banks. OTP Bank challenged the decision in court: in March 2017, the appellate court annulled the GVH's fine decision and ordered a new procedure, which the Supreme Court upheld, rendering the 2009 fine decision null and void. The GVH had already refunded the paid fine. Following the court's guidance, the GVH initiated a new (repeated) competition supervision procedure against the parties in June 2021, which was still ongoing in 2024.
Other significant procedures:
In 2024, the Hungarian National Bank (MNB) concluded a supervisory procedure initiated in 2022 against OTP Bank regarding payment services, resulting in a HUF 102 million fine and requiring the Bank to implement measures for violating several legal provisions.
The Bulgarian Commission for Personal Data Protection (CPDP) fined DSK Bank HUF 209 million for violating personal data protection rules in a 2019 case, with a final decision in 2024.
The Montenegrin Central Bank fined the Montenegrin subsidiary HUF 424 million for deficiencies in internal control systems and operational risk management following a fraud incident at a bank branch (payment occurred after the reporting period).
The Albanian National Bank conducted a procedure against the Albanian subsidiary, requiring the Bank to modify two practices, but no fine was imposed.
In 2024, there were no non-compliance incidents regarding voluntary codes related to product and service information or marketing communication.
In 2024, two legal proceedings related to equal opportunity were closed within OTP Group member company, at OTP Bank Serbia. None of these four cases resulted in fines.
In 2024, there were a total of 14 discrimination-related reports[115] within OTP Group. Nine at OTP Bank, two at OTP Bank Romania, and one each at Bulgarian DSK Bank, Montenegrin CKB subsidiary, and OTP Factoring. None of the cases were found to be justified.

4.2 Reporting policy for heading G1

G1-3 21. b In the case of anti-corruption and bribery training programs for employees in risky functions, when calculating the percentage of employees working in vulnerable functions covered by these programs, the group takes into account employees who completed the training program during the reporting period and those who were assigned to complete the program, whether or not they completed it by the reporting date.
G1-4 23. a The Group publishes the number of convictions for violations of anti-corruption and anti-bribery regulations and the total amount of fines imposed during the reporting period. The reported figures do not include judgments which may be the subject of appeal or which are still pending at the reporting date.
G1-4 24. a, GRI 2-27 The disclosure requirements for non-compliance are presented together by the Group, but the expectations of the ESRS and the GRI Standards 2021 GRI 2-27 indicator used as entity-specific disclosure differ in part in relation to nonconformities on different topics.

- G1-4 24. a the number of convictions for breaches of anti-corruption and anti-bribery legislation;
- GRI 2-27 non-compliance with laws and regulations;

The Group publishes information by topics of violation; there is no overlap between cases per topic. The Group publishes the total number of cases closed. It publishes the total number of cases with fines and the amount of fines paid, including:

- Fines for practices during the reporting period: practice still in place at the time the fine was imposed;
- Fines for practices belonging to an earlier period: the practice complained of had

[115] Information on cases of discrimination against an entity's own workforce can be found in Chapter S1 – Own workforce.

already ceased in a previous year before the fine was imposed.

The Group shall publish the number of significant cases of non-compliance. Non-compliance is significant where:

- the fine for a case reaches HUF 10 million;
- several fines paid for the same practice amount to HUF 10 million;
- a case not involving the imposition of a fine is normally considered not significant, except if the competent area of expertise of the Group Member considers otherwise.

For Discrimination Cases and Elimination Measures, discrimination (as defined in the ESRS) means discrimination based on gender identity, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation; It also includes cases of harassment as a specific form of discrimination.
The Group reports the total number of cases of discrimination received, including separately the number of cases of discrimination against own workforce (S1-17 103. a). The Group also reports the number of cases of legitimate discrimination, including cases of discrimination against an entity's own workforce.

5. Appendix

The professional experience of the members of the Supervisory Board and the Board of Directors (governing bodies)

Senior management and executive members of the Board of Directors of OTP Bank

Internal members

Dr. Sándor Csányi
Chairman of the BoD
Chairman & CEO
From 1980 he worked at the Tax Revenue Directorate and then at the Secretariat (Banking Supervision Section) of the Ministry of Finance then from 1983 to 1986, he was Head of Department at the Ministry of Agriculture and Food Industry. From 1986 to 1989 he was a senior department head at the Hungarian Credit Bank (MHB). From 1989 to 1992 he was Deputy CEO of K&H Bank. He has been the Chairman and CEO of OTP Bank Plc. since 1992. He is Vice Chairman of the Board of Directors of MOL Plc. and Co-Chairman of the Chinese-Hungarian Business Council. In 2022, through contributing 100% of the shares of Bonitás 2002 Ltd. and Hungerit Ltd. as well as substantial cash, he founded Unity Asset Management Foundation, which acts as his family office and manages sizable investments. Bonitás 2002 Ltd. is the holding company that oversees his investments in agriculture, the food industry, real estate and asset management, which comprise some 240 directly or indirectly owned companies. Bonitás 2002 Ltd. is one of the largest investors in agriculture and food industry in the CEE region through Bonafarm Group, Hungerit Ltd. and KITE Ltd. generating a total annual revenue of EUR 2.5 billion with more than 9.500 employees and with a total of 40.000 hectares of cultivated farmland. The Bonafarm Group is vertically integrated with agricultural companies producing the raw materials for food processors: Hungary's largest meat processor, Pick Szeged Co and MCS Vágóhíd Ltd., the dairy company Sole-Mizo Ltd. and the winery Csányi Pincészet Ltd. It also has significant investments in real estate and construction companies as well as in venture capital and real estate funds through the Bonitás Venture Capital and Real Estate Fund. The size of venture capital fund is EUR 20 million and the average VC investment is between EUR 900.000 and EUR 2 million, while the size of the real estate fund is EUR 80 million. Bonitás 2002 Ltd.'s portfolio also includes the largest hungarian private hospital, BEK Ltd.

Péter Csányi
Deputy CEO
Digital Division
He began his career in 2006 at Merrill Lynch's London office as an intern and he was working part-time on corporate finance projects for

financial institutions while attending university as well. From 2007 to 2011, he was an analyst in Deutsche Bank's London office and then a financial advisor in the field of corporate finance (for Central and Eastern European corporate customers). From 2011–2016, he worked for McKinsey & Company Inc. as a senior consultant mostly working on banking related projects. He joined OTP Bank in 2016 as managing director of the Digital Sales and Development Directorate. After the agile transformation at the Bank, he became responsible for the management of the Omnichannel Tribe from 2019. In addition, since January 2021, he was the head of the Daily Banking Tribe. Since March 2021, he has been the Deputy CEO of OTP Bank, the head of the IT Division (as of 1 May 2021 Digital Division) and the Member of the Management Committee. Since July 2023 he is the Chairman of the Executive Steering Committee. He has been a member of OTP Bank's Board of Directors since 16 April 2021. From 2020 he has been Chairman of the Supervisory Board of OTP banka d.d. in Croatia. He is also a member of the OTP Mobil Ltd. Supervisory Board, the Board of Directors of PortfoLion Ltd., and the Supervisory Board of Fizz.hu (Ecosystem Ltd.). He is also the head of the Digitization Working Group of the Hungarian Banking Association and a member of the Mastercard European Advisory Board and the vice president responsible for digital transformation of IVSZ IT Association of Hungary.

László Wolf
Deputy CE
Commercial Banking Division

From 1983 after graduation, he worked at the Bank Relations Department of the National Bank of Hungary for 8 years, and then he was head of Treasury at BNP-KH-Dresdner Bank between 1991 and 1993. From April 1993 he was managing director of OTP Bank's Treasury Directorate, and since 1994 he has been the head of Commercial Banking Division as Deputy CEO of OTP Bank Plc. Since 2003 he has been a member of DSK Bank's Supervisory Board. He has been a member of OTP Bank's Board of Directors since 15 April 2016.

External members

Tamás György Erdei
Deputy Chairman of the BoD
BSc Business Administration

He began his professional career at OTP, in a variety of administrative roles (his last position was branch manager), before going on to work at the Ministry of Finance in the area of bank supervision. From 1983 he was employed by the Hungarian Foreign Trade Bank, where he gradually worked his way up through the ranks. In 1985 he became managing director, in 1990 he was appointed Deputy CEO, then in 1994 he became CEO, and from 1997 until the end of March 2012 he was Chairman & CEO. Between 1997 and 2008, and between 2009 and 2011, he was the elected president of the Hungarian Banking Association. He is the Chairman of the Supervisory Board of the International Children's Safety Service. He has been a member of OTP Bank's Board of Directors since 27 April 2012. He has been the Chairman of OTP Bank's Risk Assumption and Risk Management Committee, and he was a member of the Nomination Committee between 2014 and 2020. He has been the Deputy Chairman of the Board of Directors of OTP Bank Plc. since April 2019 and the Chairman of the Work-out Committee since October 2019. He has been Chairman of the Board of Directors at OTP Factoring Ltd. since December 2019.

Gabriella Balogh
Chemical engineer, MSc Economics, specialization in marketing

She worked as a marketing associate between 1993 and 1998, as director of the Marketing Department from 1998 to 2005 and as managing director of the Marketing and Sales Directorate between 2005 and 2008 at OTP Bank Plc. She has been the managing director of GoodStep Consulting Ltd. since 2008. She fulfilled group management tasks as a member of the Board of Directors at the Central European Media and Publishing Company between 2010 and 2017. She has been co-owner and Board of Directors member of Net Media Plc. since 2016. She is Presidium member and Chairwoman of the Marketing and Media Board of the Hungarian Football Federation. She is the Chairwoman of the Supervisory Board of Művészetek Palotája Ltd. Since 2023 she has been the Member of the Board of Directors of Richter Gedeon Plc. She has been a member of OTP Bank's Board of Directors since 16 April 2021.

Mihály Baumstark
BSc Agricultural Business Administration, MSc Economics

He was employed by the Ministry of Agriculture and Food Industry between 1978 and 1989. When he left the Ministry he was Deputy Head of the Investment Policy Department. Then he was managing director of Hubertus Bt., and from 1999 to 2011 he was deputy CEO and then Chairman & CEO of Villányi Winery Ltd. (now Csányi Winery Ltd.). He is currently retired. He was a member of OTP Bank's Supervisory Board from 1992 to 1999 and has been a non-executive member of OTP Bank's Board of Directors since 1999. He has been Chairman of OTP Bank's Ethics Committee since 2010, as well as a member of its Remuneration Committee since 2011. He was the member of the Nomination Committee between 2014 and 2020.

Dr. István Gresa
PhD Business Administration and Economics

He has been working in the banking sector since 1989. Between 1989 and 1993 he was branch manager of Budapest Bank's Zalaegerszeg branch. From 1993 he was director of OTP Bank's Zala County Directorate, and from 1998 he was the managing director of the Bank's West Transdanubian Region. From 1 March 2006 until 14 April 2016 – when he retired – he was Deputy CEO of OTP Bank Plc., the Head of the Credit Approval and Risk Management Division. He was Chairman of the Board of Directors at OTP Factoring Ltd. between 2006 and 2017. He has been a member of OTP Bank's Board of Directors since 27 April 2012.

Antal György Kovács
MSc Economics

He began his professional career in 1990 at the Nagyatád branch of K&H Bank, where he worked as a branch manager between 1993 and 1995. He has been working at OTP Bank Plc. since 1995, first as a county director and from 1998 as the executive director of OTP Bank's South Transdanubian Region. From 1 July 2007 to 31 December 2022 he was the head of Retail Division as OTP Bank's Deputy CEO. He has received additional training at the International Training Centre for Bankers and on various courses held by the World Trade Institute. Between April 2007 and April 2012 he was Chairman of the Supervisory Board of OTP banka Hrvatska d.d. He was the Chairman of the Supervisory Board of OTP Bank Romania SA from 12 December 2012, until the sale of the Romanian subsidiary bank. He has been Chairman of the Board of Directors of OTP Mortgage Bank Ltd. and OTP Building Society Ltd. since 24 April 2014. Between 15 April 2016 and 27 April 2023 he was a member of OTP Bank's Board of Directors, on 28 April 2023 the General Meeting of OTP Bank elected him as non-executive member of the Board of Directors.

György Nagy
Msc International Economics

He was a founding owner of Wallis Holding (founded in 1990) and he managed the Wallis Group as CEO until 2000. He founded Westbay Holding Ltd. in 2004, the company's portfolio includes several successful investments. He has been a member of OTP Bank's Board of Directors since 16 April 2021.

Dr. Márton Gellért Vági
General Secretary
Hungarian Football Associaton

From 1987 to 2000 he was lecturer at University of Economic Science of Budapest (today Corvinus University of Budapest) and from 1994 onwards associate professor and head of department. He has a university doctorate and a PhD in economics. He has authored or co-authored more than 80 studies, essays and books. Between 2000 and 2006 he worked at the State Holding and Privatisation Co. (ÁPV Ltd.) as managing director, Deputy CEO and then CEO. Between 2006 and 2010 he was the Chairman of the National Development Agency. In various periods between 2000 and 2010, he was the Chairman of the Board of Directors of Magyar Villamos Művek, Paks Nuclear Power Plant and the National Textbook Publishing House. Between 2002 and 2010, he was a member of the Board of Directors of Földhitel és Jelzálogbank Nyrt., and the Chairman of the Board of Directors for 4 years.Since 2010 he has been general secretary of the Hungarian Football Federation. He was a member of UEFA's HatTrick Financial Assistance Committee between 2011 and 2023. He has been a member of FIFA's Financial Committee since 2017 and since 2023 he has been one of the Vice Presidents of the UEFA National Teams Competition Committee. He was a member of OTP Bank's Supervisory Board between 2011–2021. He was a member of OTP Bank's Audit Committee between 2014-2021. He was a member of OTP Bank's Nomination Committee between 2020–2021. He has been a member of OTP Bank's Board of Directors since 16 April 2021.

Dr. József Zoltán Vörös
Professor emeritus, academician
University of Pécs

He has been a member of the Hungarian Academy of Sciences since 2013. Between 1990 and 1993 he was the dean of the Faculty of Business and Economics, Janus Pannonius University (JPTE) in Pécs. In 1993 he attended a course in management for senior executives at Harvard University. From 1994 he was a professor at JPTE, from 2021 he has been professor emeritus. He was the senior Vice Rector of the University from 2004–2007, between 2007 and 2011 he was the Chairman of the Economic Council of the University of Pécs. He has been a non-executive member of OTP Bank's Board of Directors since 1992. He has been the Chairman of OTP Bank's Remuneration Committee since 2009, and member of its Risk Assumption and Risk Management Committee since 2014.

Members of the Supervisory Board of OTP Bank Plc.

Tibor Tolnay
Chairman of the SB

From 1989 to 1994, he was the director of State Construction Company No. 21. From 1994 to 2015 he was the Chairman & CEO of the already privatized Magyar Építő Joint Stock Company. He has been the managing director of Érték Ltd. since 1994. From 2018 to 2021 he was the President of the National Association of Entrepreneurs and Employers, since 2021 co-President. Since 1992 he has been a member of OTP Bank's Supervisory Board, and Chairman of the Supervisory Board since 1999. He was a member and Deputy Chairman of OTP Bank's Audit Committee between 2007 and 2011 and has been again since 2014. He has been the Chairman of OTP Bank's Nomination Committee since 2020.

Dr. József Gábor Horváth
Deputy Chairman of the SB
Retired Lawyer

From 1983 he worked for the Hungarian State Development Bank. He has been a lawyer since 1986, and from 1990 to 2023 he run his own law firm, which was specialised in corporate finance and corporate governance. He has been a member of the Supervisory Board of OTP Bank since 1995 and was a member of MOL Plc.'s Board of Directors between 1999 and 2014. He has been Deputy Chairman of OTP Bank's Supervisory Board since 2007. He was Chairman of OTP Bank's Audit Committee between 2007 and 2011 and has been again since 2014. He has been a member of OTP Bank's Nomination Committee since 2020. He was a member of the Board of Directors of INA Industrija Nafte d.d. from 2014 to 2018.

Dr. Tamás Gudra
BSc Business Administration, Lawyer

He worked as an auditor from 1993 to 2001 at Deloitte & Touche. Between 2001 and 2003 he was an accounting expert of subsidiaries at the Accounting and Tax Directorate of the

Hungarian Oil and Gas Public Limited Company (MOL Rt). Then he was managing director at the Auditor, Financial and Accounting Directorate of the National Privatization and Asset Manager Plc. (ÁPV Ltd.) between 2003 and 2007 and became the director of Controlling Directorate at the Hungarian National Asset Manager Plc. (MNV Ltd.) from 2008 to 2010, then he worked as the CFO of the Hungarian Football Federation from 2011 until June of 2020. Between 2020 and 2024 he was the group-level CFO of Bonafarm Ltd. He has been the strategic advisor of OTP Pension Fund since May 2024. He was a member of the Supervisory Board of OTP Lakástakarék Ltd. between 2012 and 2021 and he is Chairman of the Hungarian Paralympic Committee's Supervisory Board since 2016. Since 2021 he has been property inspector of Hungarian University of Agriculture and Life Sciences. Since 2022, he has been the asset controller of the Unity Asset Management Foundation. He has been a member of the Supervisory Board and Audit Committee of OTP Bank since 16 April 2021.

Olivier Péqueux
Groupama International SA
Started to work in 1998 as an insurance commissioner for the French Insurance Supervisory Authority. In 2003, he joined the French Ministry of Finance to take part in the pension law reform and the setup of a pension fund for French civil servants. Then he became technical adviser to the French Minister of health and pensions. In 2005 he joined Groupama Group, first in charge of the actuary and accounting department of Gan Patrimoine, a life insurance company, and then in 2007 as Chief Financial Officer of Groupama Paris Val de Loire.
He moved to China in March 2011 as Deputy General Manager of Groupama China, in charge of finance, actuary and investments in the joint venture between AVIC and Groupama. From 2015 to 2017, he was the General Manager of Groupama AVIC. He wasthe Chief International Officer of Groupama Assurances Mutuelles between 2018 and 2024. Since May 2024 he is Deputy CEO in charge of Finance, Actuarial, Audit and Risks at Groupama Assurances Mutuelles. He has been a member of OTP Bank's Supervisory Board, and Audit Committee since 2018.

Employees delegates

Klára Bella
Director
Large Corporate Department
From 1992 to 1994 she worked as a clerk at the Fertőszentmiklós branch of OTP Bank. From 1994 to 1995 she was a lending consultant at Polgári Bank. From 1995 to 1996 she worked as a risk manager at the Central Branch of OTP Bank. From 1996 to 1997 she was authorizer in the Credit Approval and Risk Management Division. From 1997 to 2010 she was Deputy Managing Director at the Central Branch. From 2010 to 2016 she was Director at the Central Branch. Between 2017 and 2020, she was Director of the Corporate Directorate. Since 1 July 2020, she has been the Director of the Large Corporate Department of the Specialised Finance Directorate. She has been a member of OTP Bank's Supervisory Board, and representative of the Bank's employees since 12 April 2019.

András Michnai
President of OTP Bank's Employees' Trade Union
He has been an employee of the Bank since 1974, and until 1981 held a variety of posts in the branch network. Following this he held a management position in the central network coordination department before returning to work in the branch network. From 1994, as deputy managing director, he participated in the central coordination of the branch network. Between 2005 and 2014 he was the managing director of the Bank's Compliance Department. He has been a member of OTP Bank's Supervisory Board, and representative of the Bank's employees since 2008.
He has been President of OTP Bank's Employees' Trade Union since December 2011.

6. ESRS Index

56. ESRS Standard Code	ESRS Standard	Disclosure requirement code	Disclosure requirements	Reference to presentation of disclosures (page number)
ESRS 2	General Disclosures	BP-1	General basis for preparation of sustainability statements	
		BP-2	Disclosures in relation to specific circumstance	
		GOV-1	The role of the administrative, management and supervisory bodies	
		GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	
		GOV-3	Integration of sustainability-related performance in incentive schemes	
		GOV-4	Statement on due diligence	
		GOV-5	Risk management and internal controls over sustainability reporting	
		SBM-1	Strategy, business model and value chain	
		SBM-2	Interests and views of stakeholders	
		SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
		IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	
		IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	
ESRS E1	Climate Change	ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	
		E1-1	Transition plan for climate change mitigation	
		ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
		ESRS 2 IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	
		E1-2	Policies related to climate change mitigation and adaptation	
		E1-3	Actions and resources in relation to climate change policies	
		E1-4	Targets related to climate change mitigation and adaptation	
		E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	
		E1-7	GHG removals and GHG mitigation projects financed through carbon credits	
		E1-8	Internal carbon pricing	
		E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Not yet reported due to phase-in
ESRS E2	Pollution	ESRS 2 IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	
ESRS E3	Water and Marine Resources	ESRS 2 IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	
		E3-1	Policies related to water and marine resources	
		E3-2	Actions and resources related to water and marine resources	
		E3-3	Targets related to water and marine resources	
		E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	Not yet reported due to phase-in
ESRS E4	Biodiversity and Ecosystem	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
		ESRS 2 IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and oppor-tunities	
		E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	
		E4-2	Policies related to biodiversity and ecosystems	
		E4-3	Actions and resources related to biodiversity and ecosystems	
		E4-4	Targets related to biodiversity and ecosystem	
ESRS E5	Resource use and Circular economy	ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	
ESRS S1	Own Workforce	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
		S1-1	Policies related to own workforce	
		S1-2	Processes for engaging with own workers and workers' representatives about impacts	
		S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	
		S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	
		S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	
		S1-6	Characteristics of the undertaking's employees	
		S1-9	Diversity metrics	
		S1-12	Persons with disabilities	
		S1-13	Training and skills development metrics	
		S1-14	Health and safety metrics	
		S1-15	Work-life balance metrics	Not yet reported due to phase-in
		S1-16	Compensation metrics (pay gap and total compensation)	
		S1-17	Incidents, complaints and severe human rights impacts	

56. ESRS Standard Code	ESRS Standard	Disclosure requirement code	Disclosure requirements	Reference to presentation of disclosures (page number)
ESRS S4	Consumers and end users	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
		S4-1	Policies related to consumers and end-users	
		S4-2	Processes for engaging with consumers and end-users about impacts	
		S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	
		S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	
		S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	
		GRI G4: FS 13*	Access points in low-populated or economically disadvantaged areas	
		GRI 418-1*	Substantiated complaints concerning breaches of customer privacy and losses of customer data	
ESRS G1	Business conduct	ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	
		ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	
		G1-1	Corporate culture and business conduct policies and corporate culture	
		G1-3	Prevention and detection of corruption and bribery	
		GRI 2-27*	Compliance with laws and regulations	

56. List of data points originating from EU legislation		Materiality
ESRS 2 GOV-1	Board's gender diversity paragraph 21 (d)	
	Percentage of board members who are independent paragraph 21 (e) of paragraph 21	
ESRS 2 GOV-4	Due diligence statement paragraph 30	
ESRS 2 SBM-1	Participation in fossil fuel activities Paragraph 40 (d) (i)	Not material
	Participation in activities related to the production of chemicals Paragraph 40 (d) (ii)	Not material
	Participation in activities related to disputed weapons, paragraph 40 (d) (iii)	Not material
	Participation in activities related to tobacco production and production paragraph 40 (d) (iv)	Not material
ESRS E1-1	Transition plan to reach climate neutrality by 2050 paragraph 14	
	Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	
ESRS E1-4	GHG emission reduction target paragraph 34	
ESRS E1-5	Use of energy from fossil sources, broken down by source (only sectors with a significant impact on climate) paragraph 38	Not material
	Energy consumption and structure, paragraph 37	Not material
	Energy intensity in relation to activities in sectors with a high climate impact paragraphs 40 to 43	Not material
ESRS E1-6	Scope 1, 2, 3 gross and total GHG emissions paragraph 44	
	Gross GHG intensity paragraphs 53 to 55	
ESRS E1-7	GHG capture and carbon credits paragraph 56	
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	Not yet reported due to phase-in
	Amounts of funds broken down into acute and chronic physical risk, paragraph 66(a)	Not yet reported due to phase-in
	Location of significant assets exposed to substantial physical risk paragraph 66(c)	
	Real estate assets book value breakdown by energy efficiency class paragraph 67(c)	Not material
	Extent of portfolio exposure to climate-related opportunities paragraph 69	69. a) Not yet reported due to phase-in
ESRS E2-4	Emissions to air, water and land of each pollutant listed in Annex II to the European PRTR Regulation European Pollutant Release and Transfer Register, paragraph 28	Not material
ESRS E3-1	Water and marine resources paragraph 9	
	Dedicated policy, paragraph 13	Not material
	Sustainable oceans and seas paragraph 14	
ESRS E3-4	Total water recycled and reused paragraph 28 (c)	Not material
	Total water consumption in m3 per net revenue on own operations paragraph 29	Not material
ESRS 2 - IRO 1 - E4	Paragraph 16 (a) (i)	Not material
	Paragraph 16 (b)	
	Paragraph 16 (c)	Not material
ESRS E4-2	Sustainable land/agriculture practices or policies paragraph 24 (b)	
	Sustainable oceans/seas practices or policies paragraph 24 (c)	
	Policies to address deforestation paragraph 24 (d)	
ESRS E5-5	Non-recycled waste paragraph 37 (d)	Not material
	Hazardous waste and radioactive waste paragraph 39	Not material

56. List of data points originating from EU legislation		Materiality
ESRS 2 - SBM3 - S1	Risk of incidents of forced labour paragraph 14 (f)	
	Risk of incidents of child labour paragraph 14 (g)	
ESRS S1-1	Human rights policy commitments paragraph 20	
	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	
	Processes and measures for preventing trafficking in human beings paragraph 22	Not material
	Workplace accident prevention policy or management system paragraph 23	
ESRS S1-3	Grievance/complaints handling mechanisms paragraph 32 (c)	
ESRS S1-14	Number of fatalities and number and rate of work- related accidents paragraph 88 (b) and (c)	
	Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	
ESRS S1-16	Unadjusted gender pay gap paragraph 97 (a)	
	Excessive CEO pay ratio paragraph 97 (b)	
ESRS S1-17	Incidents of discrimination paragraph 103 (a)	
	Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Not material
ESRS 2 - SBM3 - S2	Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Not material
ESRS S2-1	Human rights policy commitments paragraph 17	Not material
	Policies related to value chain workers paragraph 18	Not material
	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Not material
	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	Not material
ESRS S2-4	Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Not material
ESRS S3-1	Human rights policy commitments paragraph 16	Not material
	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Not material
ESRS S3-4	Human rights issues and incidents paragraph 36	Not material
ESRS S4-1	Policies related to consumers and end-users paragraph 16	
	Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	
ESRS S4-4	Human rights issues and incidents paragraph 35	
ESRS G1-1	United Nations Convention against Corruption paragraph 10 (b)	
	Protection of whistleblowers paragraph 10 (d)	Not material
ESRS G1-4	Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	
	Standards of anti- corruption and anti- bribery paragraph 24 (b)	

STATEMENT

On behalf of OTP Bank Plc. we declare that, to the best of our knowledge, the separate and consolidated financial statements which have been prepared in accordance with the applicable accounting standards, present a true and fair view of the assets, liabilities, financial position and profit and loss of OTP Bank Plc. and its consolidated subsidiaries and associates, and give a fair view of the position, development and performance of OTP Bank Plc. and its consolidated subsidiaries and associates, describing the principal risks and uncertainties, and do not conceal facts or information which are relevant to the evaluation of the Issuer's position. Moreover, we declare that the Sustainability Report, as part of the Management Report, was prepared in accordance with sustainability reporting standards of the Accounting Act (Act C of 2000 on Accounting), the European Sustainability Reporting Standards (ESRS), and with the provisions of Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council (EU Taxonomy Regulation).

Budapest, 19 March 2025

Dr. Sándor Csányi
Chairman & CEO

László Bencsik
Chief Financial & Strategic Officer

Methodological summary of the change in the scope of adjustment items

In accordance with the management's decision, the scope of adjustment items presented on consolidated level changed from 2024. According to the methodology applied until the end of 2023 (hereinafter: **old methodology**), in 2023 the following adjustment items were carved out of the regular P&L accounts of individual segments, with after tax amount: dividends and net cash transfers, goodwill/investment impairment charges, special tax on financial institutions, expected one-off effect of the interest rate cap for certain loans in Hungary and Serbia, effect of the winding up of Sberbank Hungary, effect of acquisitions, result of the treasury share swap agreement, and impairments on Russian government bonds at OTP Core and DSK Bank.
According to the methodology applied from 2024 onwards (hereinafter: **new methodology**), only the following adjustment items are carved out and presented on consolidated level, with after tax amount: goodwill impairment, and the direct effect of acquisitions. Starting from 2024, the direct effect of acquisitions includes only three items: badwill and initial risk cost related to acquisitions, and the gain or loss on the sale of a subsidiary. Under the old methodology, the effect of acquisitions line included further acquisition-related items, such as integration costs, and customer base value amortization.
From 3Q 2024, a materiality threshold was introduced: the relevant items are presented amongst adjustments only if the given item exceeds 10% of the quarterly consolidated profit after tax.
Under the new methodology, items previously presented as adjustments are now presented in the relevant geographical or business segment where they occurred (e.g. the special banking taxes in Hungary are presented partly within OTP Core and partly within Merkantil Group segment).
For the sake of comparability, in the report the relevant consolidated tables are presented in accordance with both the old and the new methodologies, including data for 2024 under the old methodology[116].
This change in methodology does not affect the consolidated and separate balance sheets, as, according to both the old and the new methodologies, the adjustment items affect only the profit and loss statement and the relevant performance indicators calculated from the profit and loss lines concerned, but not the balance sheet.

Footnotes of the table 'consolidated profit after tax breakdown by subsidiaries (IFRS)'

General note: regarding OTP Core and other subsidiaries, the adjusted profit after tax is calculated without the effect of adjustment items according to the new methodology.

(1) Aggregated adjusted profit after tax of OTP Core and foreign banks.
(2) OTP Core is an economic unit for measuring the result of core business activity of OTP Group in Hungary. Financials of OTP Core are calculated from the partially consolidated IFRS financial statements of certain companies engaged in OTP Group's operation in Hungary. These companies include OTP Bank Hungary Plc., OTP Mortgage Bank Ltd., OTP Building Society Ltd., OTP Factoring Ltd., OTP Financial Point Ltd., and companies providing intragroup financing; OTP Bank Employee Stock Ownership Plan Organization was included from 4Q 2016; OTP Card Factory Ltd., OTP Facility Management Llc., Monicomp Ltd. and OTP Real Estate Leasing Ltd. were included from 1Q 2017 (from 1Q 2019 OTP Real Estate Lease Ltd.

[116] For the actual period, under the old methodology the *Dividends and net cash transfers adjustment* line is zero, as taking into account its magnitude, this item is presented on the *Other net non-interest income* line.

was eliminated from OTP Core); OTP Mobile Service Llc. and OTP Ingatlanpont Llc. were included from 1Q 2019; OTP Ecosystem Ltd. (previous name: OTP eBIZ Ltd., it was eliminated from 1Q 2023) was included from 1Q 2020; OTP OTP Home Solutions was included from 2Q 2021; Bajor-Polár Center Real Estate Management Ltd., CIL Babér Ltd., BANK CENTER No. 1. Ltd. and MFM Project Investment and Development Ltd. were included from 1Q 2024 (in 4Q 2024, MFM Project Investment and Development Ltd. and Bajor-Polár Center Real Estate Management Ltd. merged into BANK CENTER No. 1. Investment and Development Ltd. At the same time OTP Facility Management Ltd., which was already part of OTP Core before 2024, merged into CIL Babér Ltd.).

(3) The result and balance sheet of OTP Factoring Bulgaria EAD and DSK Leasing AD is included.

(4) Until August 2024, including the statement of recognised income and balance sheet of SKB Banka d.d. Ljubljana, SKB Leasing d.o.o., SKB Leasing Select d.o.o. and from February 2023 Nova Kreditna Banka Maribor d.d. In august 2024, the merger of SKB Banka and Nova KBM was completed.

(5) The statement of recognised income and balance sheet of OTP Leasing d.d. was included.

(6) The financial performance of OTP Factoring Serbia d.o.o, OTP Lizing d.o.o., OTP Leasing Srbija d.o.o., OTP Osiguranje A.D.O. and OTP Services d.o.o. is included.

(7) The balance sheet of Ipoteka Bank in Uzbekistan was consolidated from June 2023, whereas the adjusted profit of Ipoteka Bank was recognized in the consolidated P&L from 3Q 2023.

(8) Figures are based on the aggregated financial statements of OTP Bank JSC, LLC OTP Leasing, and OTP Factoring Ukraine LLC.

(9) The statement of recognised income and balance sheet of OTP Debt Collection d.o.o., and the acquired Podgoricka banka (which merged into the Montenegrin bank in 4Q 2020) was included.

(10) The balance sheet of the newly acquired Alpha Bank Albania was included from July 2022, its statement of recognised income from August 2022. Alpha Bank Albania merged with OTP Bank Albania in December 2022.

(11) The statement of recognised income and balance sheet of LLC MFO "OTP Finance" is included.

(12) In July 2024 the sale of the Romanian bank was financially closed, therefore the Romanian segment contributed to the Group results until June 2024.

(13) The subconsolidated adjusted profit after tax of Merkantil Group (Merkantil Bank Ltd., Merkantil Bérlet Ltd., OTP Real Estate Leasing Ltd., NIMO 2002 Ltd., SPLC-P Ltd., SPLC Ltd.) was presented.

(14) LLC AMC OTP Capital, DSK Asset Management EAD (Bulgaria), ILIRIKA DZU a.d. Belgrade (Serbia), and OTP Asset Management SAI S.A. (Romania) until September 2024.

(15) Velvin Ventures Ltd. (Belize), SC Aloha Buzz SRL, SC Favo Consultanta SRL, SC Tezaur Cont SRL (Romania), OTP Solution Fund (Ukraine), Mendota Invest d.o.o. (Slovenia), R.E. Four d.o.o., Novi Sad (Serbia).

(16) The adjusted profit after tax of the Hungarian operation line includes the adjusted profit after tax of the Hungarian subsidiaries, as well as the eliminations allocated onto these entities.

(17) The adjusted profit after tax of the Foreign operation line includes the adjusted profit after tax of the Foreign subsidiaries, as well as the eliminations allocated onto these entities.

Calculculation of the adjusted lines of IFRS profit and loss statements, as well as the adjusted balance sheet lines presented in the report, and the methodology for calculating the FX-adjusted balance sheet and P&L dynamics

In order to present Group performance reflecting the underlying business trends, the presented consolidated and separate/sub-consolidated profit and loss statements of this report were adjusted, among others, in the following ways, and the adjusted P&Ls are shown and analysed in the Report (unless otherwise stated). Consolidated financial statements together with separate figures of OTP Bank are disclosed in the Financial Data section.

The details of the methodology change affecting adjustment items can be found in the *Methodological summary of the change in the scope of adjustment items* section.

Adjustments affecting the income statement:

- The after tax effect of adjustment items (certain, typically one-off items from banking operations' point of view) are shown and analysed separately in the Statement of Recognised Income.
- Performance indicators (such as cost/income ratio, net interest margin, risk cost to average gross loans as well as ROA and ROE ratios etc.) presented in this report are calculated on the basis of the adjusted profit and loss statement excluding adjustment items (unless otherwise indicated).
- In the Consolidated financial highlights and share data table the Book Value Per Share and the Tangible Book Value Per Share, as well as indicators derived from these are calculated based on the consolidated diluted share count used for EPS calculation.
- Within the report, FX-adjusted statistics for business volume developments and their product breakdown, as well as the FX-adjusted stock of allowances for loan losses are disclosed, too. For FX-adjustment, the closing cross currency rates for the current period were used to calculate the HUF equivalent of loan and deposit volumes in the base periods. Thus, the FX-adjusted volumes for the base periods are different from those published in previous reports.
- The FX-adjusted changes of certain consolidated or sub-consolidated P&L lines in HUF terms may be presented in this Report. According to the applied methodology in the case of the P&L lines, the FX-effect is filtered out only in relation to the currency of the given country, irrespective of the transactional currency mix in which the given P&L line materialized. Thus, for instance, as for the consolidated FX-adjusted operating cost development, the effect of the Hungarian Forint rate changes against the given currency is not eliminated in the case of the cost items arising in FX within the Hungarian cost base.

Adjustments affecting the balance sheet:

- On 9 February 2024 OTP Bank announced the signing of the share sale and purchase agreement to sell its Romanian operation, and the transaction was financially completed on 30 July 2024. As a result of this, according to IFRS 5, starting from the end of 2023 until June 2024, the Romanian operation was presented as an asset classified as held for sale in the consolidated balance sheet, and as discontinued operation in the income statement. With regards to the consolidated balance sheet, from 4Q 2023 all Romanian assets and liabilities were shown on a separate line in the balance sheet. As for the consolidated income statement, in 4Q 2023 for full-year 2023, and in the 2024 actual period the Romanian contribution was shown separately from the result of continuing operation, on the Net loss/gain from discontinued operation line, i.e. from 4Q 2023 the particular P&L lines in the 'continuing operations' section of the P&L don't incorporate the contribution from the Romanian subsidiaries. As opposed to this, in the adjusted financial statements presented in the Management Report – in line with the structure of the financial statements monitored by the management – until its deconsolidation the Romanian operation was presented in a way as if it was still classified as continuing operation, i.e. its net interest income contribution was presented on the net interest income line in the consolidated adjusted income statement.
- In the adjusted balance sheet, net customer loans include the stock of loans at amortized cost, loans mandatorily at fair value through profit or loss, and finance lease receivables.

Alternative performance measures pursuant to the National Bank of Hungary 5/2017. (V. 24.) recommendation[117]:

Alternative performance measures name	Description	Calculation (data in HUF million)	Measures value 2023 old methodology	2023 new methodology	2024 new methodology
Leverage, consolidated[118]	The leverage ratio is calculated pursuant to Article 429 CRR. The calculation of the indicator is designed quarterly by the Bank for the prudential consolidation circle.	The leverage ratio shall be calculated as an institution's capital measure divided by that institution's total exposure measure and shall be expressed as a percentage. Example for 2024: $\frac{4,842,978.2}{46,412,734.7} = 10.4\%$ Example for 2023: $\frac{3,945,569.6}{42,426,769.2} = 9.3\%$	9.3%	9.3%	10.4%
Liquidity Coverage Ratio (LCR)	According to Article 412 (1) of CRR, the liquidity coverage ratio (LCR) is designed to promote short-term resilience of the Issuer's/Group's liquidity risk profile and aims to ensure that the Issuer/Group has an adequate stock of unencumbered High Quality Liquid Assets (HQLA) to meet its liquidity needs for a 30 calendar day liquidity stress scenario.	The LCR is expressed as: (stock of HQLA)/(total net cash outflows over the next 30 calendar days) ≥ 100%. The numerator of the LCR is the stock of HQLA (High Quality Liquid Assets). In order to qualify as HQLA, assets should be liquid in markets during a time of stress and, in most cases, be eligible for use in central bank operations. The denominator of the LCR is the total net cash outflows, defined as total expected cash outflows minus total expected cash inflow in the specified stress scenario for the subsequent 30 calendar days. Total cash inflows are subject to an aggregate cap of 75% of total expected cash outflows, thereby ensuring a minimum level of HQLA holdings at all times. Example for 2024: $\frac{12,296,693.9}{6,618,330.9-1,987,679.4} = 265.6\%$ Example for 2023: $\frac{11,062,683.8}{6,528,404.6-2,033,178.9} = 246.1\%$	246.1%	246.1%	265.6%
ROE, consolidated	The return on equity ratio shall be calculated the consolidated accounting profit after tax for the given period divided by the average equity, thus shows the effectiveness of the use of equity.	The numerator of the indicator is the consolidated profit after tax for the given period (annualized for periods less than one year), the denominator is the average consolidated equity. (The definition of average equity: calendar day-weighted average of the average balance sheet items in periods comprising the given period, where periods comprising the given period are defined as quarters (and within that months) in case of 1H, 9M and FY periods, and months in case of quarters. Furthermore, the average of the average balance sheet items is computed as the arithmetic average of closing balance sheet items for the previous period and the current period.). Example for 2024: $\frac{1,076,139.4 \times 1.0}{4,582,285.5} = 23.5\%$ Example for 2023: new methodology $\frac{990,459.5 \times 1.0}{3,639,782.4} = 27.2\%$ Example for 2023: old methodology $\frac{990,459.5 \times 1.0}{3,639,782.4} = 27.2\%$	27.2%	27.2%	23.5%
ROE (adjusted), consolidated	The return on equity ratio shall be calculated the consolidated adjusted profit after tax for the given period divided by the average equity, thus shows the effectiveness of the use of equity.	The numerator of the indicator is the consolidated adjusted profit after tax for the given period (annualized for periods less than one year), the denominator is the average consolidated equity. Example for 2024: $\frac{1,076,139.4 \times 1.0}{4,582,285.5} = 23.5\%$ Example for 2023: new methodology $\frac{904,952.5 \times 1.0}{3,639,782.4} = 24.9\%$ Example for 2023: old methodology $\frac{1,008,582.9 \times 1.0}{3,639,782.4} = 27.7\%$	27.7%	24.9%	23.5%

[117] The NBH's recommendation (5/2017, 24 May) on Alternative Performance Measures (APM) came into effect from 1 June 2017, in line with ESMA's guidance (ESMA/2015/1415) on the same matter. The recommendation is aimed at – amongst other things – enhancing the transparency, reliability, clarity and comparability of those APMs within the framework of regulated information and thus facilitating the protection of existing and potential investors.

[118] Based on the prudential consolidation scope, which is different from the consolidation scope used in this report.

Alternative performance measures name	Description	Calculation (data in HUF million)	Measures value 2023 old methodology	2023 new methodology	2024 new methodology
ROA (adjusted), consolidated	The return on asset ratio shall be calculated the consolidated adjusted net profit for the given period divided by the average total asset, thus shows the effectiveness of the use of equity.	The numerator of the indicator is the consolidated adjusted net profit for the given period, the denominator is the average consolidated total asset. (The definition of average asset: calendar day-weighted average of the average balance sheet items in periods comprising the given period, where periods comprising the given period are defined as quarters (and within that months) in case of 1H, 9M and FY periods, and months in case of quarters. Furthermore, the average of the average balance sheet items is computed as the arithmetic average of closing balance sheet items for the previous period and the current period.). Example for 2024: $\frac{1{,}076{,}139.4 \times 1.0}{41{,}688{,}546.3} = 2.6\%$ Example for 2023: new methodology $\frac{904{,}952.5 \times 1.0}{37{,}168{,}362.1} = 2.4\%$ Example for 2023: old methodology $\frac{1{,}008{,}582.9 \times 1.0}{37{,}168{,}362.1} = 2.7\%$	2.7%	2.4%	2.6%
Operating profit margin (adjusted), consolidated	The operating profit margin shall be calculated the consolidated adjusted net operating profit for the given period divided by the average total assets, thus shows the effectiveness of the operating profit generation on total assets.	The numerator of the indicator is the consolidated adjusted net operating profit for the given period, the denominator is the average consolidated total assets. Example for 2024: $\frac{1{,}545{,}377.0 \times 1.0}{41{,}688{,}546.3} = 3.71\%$ Example for 2023: new methodology $\frac{1{,}265{,}909.2 \times 1.0}{37{,}168{,}362.1} = 3.41\%$ Example for 2023: old methodology $\frac{1{,}260{,}849.8 \times 1.0}{37{,}168{,}362.1} = 3.39\%$	3.39%	3.41%	3.71%
Total income margin (adjusted), consolidated	The total income margin shall be calculated the consolidated adjusted total income for the given period divided by the average total assets, thus shows the effectiveness of income generation on total assets.	The numerator of the indicator is the consolidated adjusted total income for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets. Example for 2024: $\frac{2{,}633{,}907.7 \times 1.0}{41{,}688{,}546.3} = 6.32\%$ Example for 2023: new methodology $\frac{2{,}245{,}706.5 \times 1.0}{37{,}168{,}362.1} = 6.04\%$ Example for 2023: old methodology $\frac{2{,}224{,}584.2 \times 1.0}{37{,}168{,}362.1} = 5.99\%$	5.99%	6.04%	6.32%
Net interest margin (adjusted), consolidated	The net interest margin shall be calculated the consolidated adjusted net interest income for the given period divided by the average total assets, thus shows the effectiveness of net interest income generation on total assets.	The numerator of the indicator is the consolidated adjusted net interest income for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets. Example for 2024: $\frac{1{,}782{,}603.6 \times 1.0}{41{,}688{,}546.3} = 4.28\%$ Example for 2023: new methodology $\frac{1{,}461{,}849.8 \times 1.0}{37{,}168{,}362.1} = 3.93\%$ Example for 2023: old methodology $\frac{1{,}459{,}693.5 \times 1.0}{37{,}168{,}362.1} = 3.93\%$	3.93%	3.93%	4.28%
Operating cost (adjusted)/ total assets, consolidated	The indicator shows the operational efficiency.	The numerator of the indicator is the consolidated adjusted operating cost for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets. Example for 2024: $\frac{1{,}088{,}530.7 \times 1.0}{41{,}688{,}546.3} = 2.61\%$ Example for 2023: new methodology $\frac{979{,}797.3 \times 1.0}{37{,}168{,}362.1} = 2.64\%$ Example for 2023: old methodology $\frac{963{,}734.3 \times 1.0}{37{,}168{,}362.1} = 2.59\%$	2.59%	2.64%	2.61%

Alternative performance measures name	Description	Calculation (data in HUF million)	Measures value 2023 old methodology	2023 new methodology	2024 new methodology
Cost/income ratio (adjusted), consolidated	The indicator is another measure of operational efficiency.	The numerator of the indicator is the consolidated adjusted operating cost for the given period, the denominator is the adjusted operating income for the given period. Example for 2024: $\frac{1,088,530.7}{2,633,907.7}$ = 41.3% Example for 2023: new methodology $\frac{979,797.3}{2,245,706.5}$ = 43.6% Example for 2023: old methodology $\frac{963,734.3}{2,224,584.2}$ = 43.3%	43.3%	43.6%	41.3%
Provision for impairment on loan and placement losses (adjusted)/ average (adjusted) gross loans, consolidated	The indicator provides information on the amount of impairment on loan and placement losses relative to gross customer loans.	The numerator of the indicator is the consolidated adjusted provision for impairment on loan and placement losses for the given period (annualized for periods less than one year), the denominator is the adjusted consolidated gross customer loans for the given period. (The definition of average [adjusted] gross customer loans: calendar day-weighted average of the average balance sheet items in periods comprising the given period, where periods comprising the given period are defined as quarters [and within that months] in case of 1H, 9M and FY periods, and months in case of quarters. Furthermore, the average of the average balance sheet items is computed as the arithmetic average of closing balance sheet items for the previous period and the current period.) Example for 2024: $\frac{89,863.8 \times 1.0}{23,446,341.1}$ = 0.38% Example for 2023: new methodology $\frac{71,689.9 \times 1.0}{21,377,407.9}$ = 0.34% Example for 2023: old methodology $\frac{34,780.7 \times 1.0}{21,377,407.9}$ = 0.16%	0.16%	0.34%	0.38%
Total risk cost (adjusted)/ total asset ratio, consolidated	The indicator shows the amount of total risk cost relative to the balance sheet total.	The numerator of the indicator is consolidated adjusted total risk cost for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets for the given period. Example for 2024: $\frac{158,494.4 \times 1.0}{41,688,546.3}$ = 0.38% Example for 2023: new methodology $\frac{86,685.2 \times 1.0}{37,168,362.1}$ = 0.23% Example for 2023: old methodology $\frac{38,521.5 \times 1.0}{37,168,362.1}$ = 0.10%	0.10%	0.23%	0.38%
Effective tax rate (adjusted), consolidated	The indicator shows the amount of corporate income tax accounted on pre-tax profit.	The numerator of the indicator is consolidated adjusted corporate income tax for the given period, the denominator is the consolidated adjusted pre-tax profit for the given period. Example for 2024: $\frac{310.743,2}{1.386.882,6}$ = 22,4% Example for 2023: new methodology $\frac{274.271,5}{1.179.224,0}$ = 23,3% Example for 2023: old methodology $\frac{213.745,5}{1.222.328,4}$ = 17,5%	17.5%	23.3%	22.4%
Net loan/ deposit ratio (FX-adjusted), consolidated	The net loan to deposit ratio is the indicator for assessing the bank's liquidity position.	The numerator of the indicator is the consolidated net consumer loan volume (gross loan reduced the amount of provision), the denominator is the end of period consolidated consumer FX-adjusted deposit volume. Example for 2024: $\frac{23,361,637.9}{31,666,401.0}$ = 74% Example for 2023: new methodology $\frac{22,549,534.3}{30,937,626.9}$ = 73% Example for 2023: old methodology $\frac{22,549,534.3}{30,937,626.9}$ = 73%	73%	73%	74%

Adjustments on the consolidated statement of profit or loss (IFRS):

	2023 old methodology HUF million	2023 new methodology HUF million	2024 new methodology HUF million
Net interest income	**1,386,706**	**1,386,706**	**1,745,341**
(-) Direct effect of acquisitions	(1,867)	(4,023)	0
(-) Reclassification due to the introduction of IFRS 16	(2,970)	(2,970)	(3,557)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	68,151	68,151	33,706
Net interest income (adj.)	**1,459,694**	**1,461,850**	**1,782,604**
Net fees and commissions	**691,994**	**691,994**	**842,654**
(+) Financial Transaction Tax	(98,472)	(98,472)	(123,298)
(-) Direct effect of acquisitions	220	247	0
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	5,537	5,537	3,503
(-) Structural shift of income from currency exchange from net fees to the FX result	120,693	120,693	177,228
Net fees and commissions (adj.)	**478,146**	**478,119**	**545,631**
Foreign exchange result	**13,827**	**13,827**	**(12,048)**
(-) Direct effect of acquisitions	(191)	(190)	0
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(11,397)	(11,397)	(1,705)
(+) Structural shift of income from currency exchange from net fees to the FX result	120,693	120,693	177,228
Foreign exchange result (adj.)	**123,314**	**123,313**	**163,475**
Gain/loss on securities, net	**7,283**	**7,283**	**10,326**
(-) Direct effect of acquisitions	(1,125)	-	-
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	194	194	5,536
(-) Revaluation result of the treasury share swap agreement	(3,868)	-	-
(+) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Gain/loss on securities, net)	(18,716)	(18,716)	(9,495)
(+) Shifting of the Gains and losses on non-trading securities mandatorily at fair value through profit or loss line from the Net other non-interest income to the Gains or losses from securities line	8,240	8,240	6,043
Gain/loss on securities, net (adj.)	**1,994**	**(2,999)**	**12,410**
Result of discontinued operation and gains from disposal of subsidiaries classified as held for sale	**(21,246)**	**(21,246)**	**19,756**
(-) Direct effect of acquisitions	(55,913)	(55,913)	0
Result of discontinued operation and gains from disposal of subsidiaries classified as held for sale (adj.)	**34,667**	**34,667**	**19,756**
Gains and losses on real estate transactions	**7,195**	**7,195**	**15,918**
Result of discontinued operation and gains from disposal of subsidiaries classified as held for sale (adjusted)	**34,667**	**34,667**	**19,756**
(+) Other non-interest income	**315,155**	**315,155**	**129,280**
(+) Net results on derivative instruments and hedge relationships	**(12,760)**	**(12,760)**	**12,004**
(+) Net insurance result	**1,915**	**1,915**	**2,697**
(+) Losses on loans measured mandatorily at fair value through other comprehensive income and on securities at amortized cost	**94,613**	**94,613**	**27,373**
(+) Profit from associates	**-**	**14,766**	**12,970**
(-) Shifting of the Gains and losses on non-trading securities mandatorily at fair value through profit or loss line from the Net other non-interest income to the Gains or losses from securities line	8,240	8,240	6,043
(-) Received cash transfers	531	-	-
(+) Other other non-interest expenses	(54,490)	(54,490)	(72,638)
(+) Change in shareholders' equity of companies consolidated with equity method, and the change in the net asset value of the private equity funds managed by PortfoLion	2,738	-	-
(-) Direct effect of acquisitions	191,783	191,793	0
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(13,697)	(13,676)	(8,971)
(+) Shifting of the costs of mediated services at Merkantil Bérlet Ltd. to the net other non-interest result line	(2,119)	(2,119)	(2,387)
(+) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Net other non-interest result)	191	191	(172)
(-) Effect of the winding up of Sberbank Hungary (recovery leg)	11,416	-	-
Net other non-interest result (adj.)	**161,436**	**185,423**	**129,788**

	2023 old methodology HUF million	2023 new methodology HUF million	2024 new methodology HUF million
Gain from derecognition of financial assets at amortized cost	**(17,182)**	**(17,182)**	**(14,409)**
(-) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Gain/loss on securities, net)	(18,716)	(18,716)	(9,495)
(-) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Provision for impairment on loan losses)	1,343	1,343	(4,741)
(-) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Net other non-interest result)	191	191	(172)
Gain from derecognition of financial assets at amortized cost (adj.)	**(0)**	**(0)**	**(0)**
Provision for impairment on loan and placement losses	**(109,223)**	**(109,223)**	**(72,383)**
(+) Modification gains or losses	**(38,141)**	**(38,141)**	**(13,193)**
(+) Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss	**(91)**	**(91)**	**5,504**
(+) Loss allowance on securities at fair value through other comprehensive income and on securities at amortized cost	**8,831**	**8,831**	**(39,907)**
(+) Provision for commitments and guarantees given	**19,870**	**19,870**	**(2,371)**
(+) Impairment of assets subject to operating lease and of investment properties	**1,333**	**1,333**	**18**
(-) Direct effect of acquisitions	(51,873)	(51,873)	0
(-) Structural correction between Provision for loan losses and Other provisions	10,164	10,164	(39,890)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	2,758	2,758	(4,714)
(+) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Provision for impairment on loan losses)	1,343	1,343	(4,741)
(-) Shifting of provision for impairment on placement losses to the other provisions line	79	79	(2,035)
(-) Expected one-off effect of the interest rate cap for certain loans in Hungary and Serbia	(36,909)	-	-
Provision for impairment on loan losses (adj.)	**(34,781)**	**(71,690)**	**(89,864)**
Profit from associates	**14,766**	**-**	**-**
(+) Received cash transfers	531	-	-
(+) Paid cash transfers	(15,360)	-	-
(-) Film subsidies and cash transfers to public benefit organisations	(15,067)	-	-
(-) Dividend income of swap counterparty shares kept under the treasury share swap agreement	14,200	-	-
(-) Change in shareholders' equity of companies consolidated with equity method, and the change in the net asset value of the private equity funds managed by PortfoLion	2,738	-	-
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	22	-	-
After tax dividends and net cash transfers	**(1,911)**	**-**	**-**
Depreciation	**(111,996)**	**(111,996)**	**(134,293)**
(-) Direct effect of acquisitions	(4,900)	(3)	0
(-) Reclassification due to the introduction of IFRS 16	(15,575)	(15,575)	(17,358)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(4,040)	(4,040)	(1,692)
(+) Structural shift of right of use asset depreciation between other non-interest expenses and depreciation line	0	0	0
Depreciation (adj.)	**(95,561)**	**(100,458)**	**(118,628)**
Personnel expenses	**(478,695)**	**(478,695)**	**(550,175)**
(-) Direct effect of acquisitions	(1,307)	1,199	0
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(26,571)	(26,571)	(14,198)
Personnel expenses (adj.)	**(503,959)**	**(506,465)**	**(564,374)**
Income taxes	**(189,477)**	**(189,477)**	**(253,440)**
(-) Corporate tax impact of goodwill/investment impairment charges	(3,919)	0	0
(-) Corporate tax impact of the special tax on financial institutions	6,079	-	-
(+) Tax deductible transfers to spectator sports (offset against corporate taxes)	(73)	(12,131)	(12,092)
(-) Corporate tax impact of the direct effect of acquisitions	9,375	6,892	0
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(3,575)	(3,575)	(2,652)
(-) Corporate tax impact of the result of the treasury share swap agreement	348	-	-
(-) Corporate tax impact of the impairments on Russian government bonds booked at OTP Core and DSK Bank	311	-	-
(-) Corporate tax impact of the winding up of Sberbank Hungary (contribution to the Deposit Protection Fund)	(1,027)	-	-
(-) Corporate tax impact of the expected one-off effect of the interest rate cap for certain loans in Hungary and Serbia	3,830	-	-
(+) Structural reclassification between Corporate income tax and Other non-interest expenses	(5,624)	(5,624)	(4,159)
(+) Special taxes on financial institutions	-	(56,572)	(38,400)
Corporate income tax (adj.)	**(213,746)**	**(274,272)**	**(310,743)**

	2023 old methodology HUF million	2023 new methodology HUF million	2024 new methodology HUF million
Other operating expense	**(110,569)**	**(110,569)**	**(127,175)**
(-) Other costs and expenses	(10,143)	(10,143)	(10,206)
(-) Other non-interest expenses	(69,850)	(69,850)	(89,334)
(-) Direct effect of acquisitions	(12,511)	(4,186)	0
(+) Structural correction between Provision for loan losses and Other provisions	10,164	10,164	(39,890)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(98)	(98)	(186)
(-) Impairments on Russian government bonds booked at OTP Core and DSK Bank	(3,110)	-	-
(+) Shifting of provision for impairment on placement losses to the other provisions line	79	79	(2,035)
(-) Shifting of certain expenses arising from mediated services from other provisions to the other non-interest expenses line	(1,252)	(1,252)	(1,115)
(-) Expected one-off effect of the interest rate cap for certain loans in Hungary and Serbia	181	-	-
Other provisions (adj.)	**(3,741)**	**(14,995)**	**(68,631)**

	2023 old methodology HUF million	2023 new methodology HUF million	2024 new methodology HUF million
Other general expenses	**(483,646)**	**(483,646)**	**(528,308)**
(+) Other costs and expenses	(10,143)	(10,143)	(10,206)
(+) Other non-interest expenses	(69,850)	(69,850)	(89,334)
(-) Paid cash transfers	(15,360)	-	-
(+) Film subsidies and cash transfers to public benefit organisations	(15,067)	-	-
(-) Other other non-interest expenses	(54,490)	(54,490)	(72,638)
(-) Special taxes on financial institutions	(68,630)	(56,572)	(38,400)
(-) Tax deductible transfers to spectator sports (offset against corporate taxes)	(73)	(12,131)	(12,092)
(-) Financial Transaction Tax	(98,472)	(98,472)	(123,298)
(-) Direct effect of acquisitions	(6,803)	1,563	0
(+) Reclassification due to the introduction of IFRS 16	(18,545)	(18,545)	(20,914)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(17,284)	(17,284)	(8,627)
(-) Shifting of the costs of mediated services at Merkantil Bérlet Ltd. to the net other non-interest result line	(2,119)	(2,119)	(2,387)
(+) Shifting of certain expenses arising from mediated services from other provisions to the other non-interest expenses line	(1,252)	(1,252)	(1,115)
(-) Structural shift of right of use asset depreciation between other non-interest expenses and depreciation line	0	0	0
(-) Structural reclassification between Corporate income tax and Other non-interest expenses	(5,624)	(5,624)	(4,159)
Other non-interest expenses (adj.)	**(364,215)**	**(372,874)**	**(405,529)**

Adjustments of consolidated IFRS balance sheet lines:

	2023 HUF million	2024 HUF million
Cash, amounts due from Banks and balances with the National Banks	**7,125,050**	**6,079,012**
(+) Allocation of Assets classified as held for sale among balance sheet lines	199,587	20
Cash, amounts due from Banks and balances with the National Banks (adjusted)	**7,324,636**	**6,079,032**
Placements with other banks, net of allowance for placement losses	**1,567,777**	**1,891,901**
(+) Allocation of Assets classified as held for sale among balance sheet lines	8,147	0
Placements with other banks, net of allowance for placement losses (adjusted)	**1,575,924**	**1,891,901**
Securities at fair value through profit and loss	**288,884**	**743,399**
(+) Allocation of Assets classified as held for sale among balance sheet lines	2,091	704
Securities at fair value through profit or loss (adjusted)	**290,975**	**744,104**
Securities at fair value through other comprehensive income	**1,601,461**	**1,705,554**
(+) Allocation of Assets classified as held for sale among balance sheet lines	39,430	0
Securities at fair value through other comprehensive income (adjusted)	**1,640,891**	**1,705,554**
Gross customer loans (incl. finance lease receivables and accrued interest receivables related to loans)	**21,329,908**	**24,334,694**
(+) Allocation of Assets classified as held for sale among balance sheet lines	1,136,507	0
Gross customer loans (adjusted)	**22,466,415**	**24,334,694**
Allowances for loan losses (incl. impairment of finance lease receivables)	**(963,179)**	**(973,056)**
(+) Allocation of Assets classified as held for sale among balance sheet lines	(55,856)	0
Allowances for loan losses (adjusted)	**(1,019,035)**	**(973,056)**
Associates and other investments	**96,110**	**124,524**
(+) Allocation of Assets classified as held for sale among balance sheet lines	236	0
Associates and other investments (adjusted)	**96,346**	**124,524**
Securities at amortized costs	**5,249,490**	**7,447,176**
(+) Allocation of Assets classified as held for sale among balance sheet lines	226,427	565
Securities at amortized costs (adjusted)	**5,475,917**	**7,447,741**
Tangible and intangible assets, net	**860,449**	**985,864**
(+) Allocation of Assets classified as held for sale among balance sheet lines	18,500	22
Tangible and intangible assets, net (adjusted)	**878,949**	**985,886**
Other assets	**2,455,664**	**1,080,060**
(+) Allocation of Assets classified as held for sale among balance sheet lines	(1,575,068)	(1,311)
Other assets (adjusted)	**880,596**	**1,078,749**
Amounts due to banks, the National Governments, deposits from the National Banks and other banks, and Financial liabilities designated at fair value through profit or loss	**2,011,569**	**2,094,681**
(+) Allocation of Liabilities directly associated with assets classified as held-for-sale among balance sheet lines	1,764	0
Amounts due to banks, the National Governments, deposits from the National Banks and other banks, and Financial liabilities designated at fair value through profit or loss (adjusted)	**2,013,333**	**2,094,681**
Deposits from customers	**28,332,271**	**31,658,190**
(+) Fair value changes of the hedged items in portfolio hedge of interest rate risk	**160**	**8,209**
(+) Allocation of Liabilities directly associated with assets classified as held-for-sale among balance sheet lines	1,095,852	0
Deposits from customers (adjusted)	**29,428,284**	**31,666,399**
Other liabilities	**2,514,876**	**1,575,553**
(+) Allocation of Liabilities directly associated with assets classified as held-for-sale among balance sheet lines	(1,097,617)	0
Other liabilities (adjusted)	**1,417,260**	**1,575,553**

Statement of profit or loss of OTP Bank Plc., according to IFRS standards as adopted by the European Union (consolidated)*:

	2024 HUF million	2023 HUF million	Change %
CONTINUING OPERATIONS			
Interest income calculated using the effective interest method	2,542,138	2,314,677	10
Income similar to interest income	539,984	633,587	(15)
Interest incomes	3,082,122	2,948,264	5
Interest expenses	(1,336,782)	(1,561,558)	(14)
NET INTEREST INCOME	**1,745,340**	**1,386,706**	**26**
Risk cost total	**(109,142)**	**(79,281)**	**38**
Loss allowance/Release of loss allowance on loans, placements, amounts due from banks and repo receivables	(72,385)	(109,223)	(34)
Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss	5,504	(91)	
Loss allowance/Release of loss allowance on securities at fair value through other comprehensive income and on securities at amortized cost	(39,907)	8,831	
Provision for commitments and guarantees given	(2,371)	19,870	
Impairment/(Release of impairment) of assets subject to operating lease and of investment properties	17	1,332	
NET INTEREST INCOME AFTER RISK COST	**1,636,198**	**1,307,425**	**25**
Income from fees and commissions	1,045,987	861,309	21
Expense from fees and commissions	(203,332)	(169,316)	20
Net profit from fees and commissions	**842,655**	**691,993**	**22**
Modification gain or loss	**(13,193)**	**(38,141)**	**(65)**
Foreign exchange gains/losses, net	(44)	1,067	(104)
Foreign exchange gains/losses, net	(12,048)	13,827	
Net results on derivative instruments and hedge relationships	12,004	(12,760)	
Gains/Losses on securities, net	10,326	7,283	
Gains/Losses on financial assets/liabilities measured at fair value through profit or loss	27,374	94,613	(71)
Gain from derecognition of financial assets at amortized cost	(14,409)	(17,182)	(16)
Profit from associates	12,970	14,766	(12)
Other operating income	147,895	324,266	(54)
Gains and losses on real estate transactions	15,918	7,195	121
Other non-interest income	129,280	315,155	(59)
Net insurance result	2,697	1,915	41
Other operating expense	(127,174)	(110,570)	15
Net operating income	**56,938**	**314,243**	**(82)**
Personnel expenses	(550,175)	(478,696)	15
Depreciation and amortization	(134,293)	(111,996)	20
Other administrative expenses	(528,306)	(483,645)	9
Other administrative expenses	**(1,212,774)**	**(1,074,337)**	**13**
PROFIT BEFORE INCOME TAX	**1,309,824**	**1,201,183**	**9**
Income tax expense	(253,440)	(189,478)	34
PROFIT AFTER INCOME TAX FOR THE PERIOD FROM CONTINUING OPERATIONS	**1,056,384**	**1,011,705**	**4**
DISCONTINUED OPERATIONS			
Net loss/gain from discontinued operation	**19,756**	**(21,246)**	
PROFIT AFTER INCOME TAX FROM CONTINUING AND DISCOUNTINUED OPERATION	**1,076,140**	**990,459**	**9**
From this, attributable to:			
Non-controlling interest	4,227	1,801	135
Owners of the company	1,071,913	988,658	8

* The rows of the table are based on audited numbers, but the structure of the table can differ from the IFRS financial statements presented in the Annual Report (certain rows might be merged or represent different level of aggregation).

Statement of financial position of OTP Bank Plc., according to IFRS standards as adopted by the European Union (consolidated)*:

	2024 HUF million	2023 HUF million	Change %
Cash, amounts due from banks and balances with the National Banks	6,079,012	7,125,049	(15)
Placements with other banks, net of loss allowance for placements	1,891,901	1,566,998	21
Repo receivables	331,837	223,884	48
Financial assets at fair value through profit or loss	743,400	288,885	157
Securities at fair value through other comprehensive income	1,705,553	1,601,461	6
Loans at amortized cost	20,290,381	17,676,533	15
Loans mandatorily at fair value through profit or loss	1,559,781	1,400,485	11
Finance lease receivables	1,511,477	1,289,712	17
Associates and other investments	124,523	96,110	30
Loans at amortized cost	7,447,177	5,249,272	42
Property and equipment	581,240	523,124	11
Intangible assets and goodwill	356,564	291,358	22
Right-of-use assets	79,830	74,698	7
Investment properties	88,240	53,381	65
Derivative financial assets designated as hedge accounting	50,381	41,967	20
Deferred tax assets	56,583	55,691	2
Current income tax receivable	7,060	7,773	(9)
Other assets	514,188	509,430	1
Assets classified as held for sale	0	1,533,333	
TOTAL ASSETS	**43,419,128**	**39,609,144**	**10**
Amounts due to banks, the National Governments, deposits from the National Banks and other banks	2,022,191	1,940,862	4
Repo liabilities	132,137	126,237	5
Financial liabilities designated at fair value through profit or loss	72,490	70,707	3
Deposits from customers	31,658,189	28,332,271	12
Fair value changes of the hedged items in portfolio hedge of interest rate risk	8,209	160	
Liabilities from issued securities	2,593,124	2,095,548	24
Derivative financial liabilities held for trading	114,089	140,488	(19)
Derivative financial liabilities designated as hedge accounting	14,605	63,899	(77)
Leasing liabilities	82,109	76,313	8
Deferred tax liabilities	32,637	28,663	14
Current income tax payable	76,787	69,948	10
Provisions	131,637	121,119	9
Other liabilities	991,552	745,820	33
Subordinated bonds and loans	369,359	562,396	(34)
Liabilities directly associated with assets classified as held for sale	0	1,139,920	
TOTAL LIABILITIES	**38,299,115**	**35,514,351**	**8**
Share capital	28,000	28,000	0
Retained earnings and reserves	5,327,652	4,179,322	27
Treasury shares	(245,319)	(120,489)	104
Total equity attributable to the parent	5,110,333	4,086,833	25
Total equity attributable to non-controlling interest	9,680	7,960	22
TOTAL SHARHOLDERS' EQUITY	**5,120,013**	**4,094,793**	**25**
TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	**43,419,128**	**39,609,144**	**10**

* The rows of the table are based on audited numbers, but the structure of the table can differ from the IFRS financial statements presented in the Annual Report (certain rows might be merged or represent different level of aggregation).

Security listed on the Budapest stock exchange between 01/01/2014 and 31/12/2024:

Issuer	Type of security	Security name	Date of issue	Date of maturity	Ccy
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/II	17/01/2014	31/01/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/I	17/01/2014	17/01/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/III	31/01/2014	14/02/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/II	31/01/2014	31/01/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/IV	14/02/2014	28/02/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/III	14/02/2014	14/02/2016	EUR
OTP Bank Plc.	Retail bond	OTP_ EURO_1 2015/V	28/02/2014	14/03/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/IV	28/02/2014	28/02/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/VI	14/03/2014	28/03/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/V	14/03/2014	14/03/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/VII	21/03/2014	04/04/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/VI	21/03/2014	21/03/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/VIII	11/04/2014	25/04/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/VII	11/04/2014	11/04/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/IX	18/04/2014	02/05/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/VIII	18/04/2014	18/04/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/X	09/05/2014	23/05/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/IX	09/05/2014	09/05/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XI	23/05/2014	06/06/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/X	23/05/2014	23/05/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XII	06/06/2014	20/06/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XI	06/06/2014	06/06/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XIII	20/06/2014	04/07/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XII	20/06/2014	20/06/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XIV	04/07/2014	18/07/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XIII	04/07/2014	04/07/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XV	18/07/2014	01/08/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XIV	18/07/2014	18/07/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XVI	30/07/2014	13/08/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XV	30/07/2014	30/07/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XVII	08/08/2014	22/08/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XVI	08/08/2014	08/08/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XVIII	29/08/2014	12/09/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XVII	29/08/2014	29/08/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XIX	12/09/2014	26/09/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XVIII	12/09/2014	12/09/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XX	03/10/2014	17/10/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_2 2016/XIX	03/10/2014	03/10/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XXI	22/10/2014	05/11/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XXII	31/10/2014	14/11/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XXIII	14/11/2014	28/11/2015	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XXIV	28/11/2014	12/12/2015	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_2 2016/I	28/11/2014	28/11/2016	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XXV	19/12/2014	02/01/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2015/XXVI	09/01/2015	23/01/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/I	30/01/2015	13/02/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/II	20/02/2015	06/03/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/III	20/03/2015	03/04/2016	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_2 2017/I	10/04/2015	10/04/2017	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/IV	10/04/2015	24/04/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/V	24/04/2015	08/05/2016	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2016/I	24/04/2015	24/04/2016	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/VI	29/05/2015	12/06/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/VII	30/06/2015	14/07/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/VIII	24/07/2015	07/08/2016	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2016/II	24/07/2015	24/07/2016	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2016/III	25/09/2015	25/09/2016	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/IX	25/09/2015	09/10/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/X	30/10/2015	13/11/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/XI	11/11/2015	25/11/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/XII	27/11/2015	11/12/2016	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2016/XIII	30/12/2015	13/01/2017	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2017/I	29/01/2016	29/01/2017	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/I	29/01/2016	12/02/2017	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/II	12/02/2016	26/02/2017	EUR

Issuer	Type of security	Security name	Date of issue	Date of maturity	Ccy
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/III	26/02/2016	12/03/2017	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2017/II	18/03/2016	18/03/2017	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/IV	18/03/2016	01/04/2017	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/V	15/04/2016	29/04/2017	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2017/III	27/05/2016	27/05/2017	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/VI	27/05/2016	10/06/2017	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/VII	10/06/2016	24/06/2017	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/VIII	01/07/2016	15/07/2017	EUR
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/IX	10/08/2016	24/08/2017	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2017/IV	16/09/2016	16/09/2017	USD
OTP Bank Plc.	Retail bond	OTP_EURO_1 2017/X	16/09/2016	30/09/2017	EUR
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/I	20/01/2017	20/01/2018	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2021/I	15/02/2017	27/10/2021	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2020/III	23/02/2017	20/05/2020	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2022/I	24/02/2017	24/05/2022	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/II	03/03/2017	03/03/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/III	13/04/2017	13/04/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/IV	02/06/2017	02/06/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/V	14/07/2017	14/07/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/VI	04/08/2017	04/08/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/VII	29/09/2017	29/09/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/VIII	17/11/2017	17/11/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2018/IX	20/12/2017	20/12/2018	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/I	16/02/2018	16/02/2019	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/II	29/03/2018	29/03/2019	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2023/I	05/04/2018	24/11/2023	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/III	18/05/2018	18/05/2019	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/IV	28/06/2018	28/06/2019	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/V	06/08/2018	06/08/2019	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/A	17/09/2018	20/05/2024	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/B	18/09/2018	24/05/2024	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/VI	04/10/2018	04/10/2019	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/II	10/10/2018	24/10/2024	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/VII	15/11/2018	15/11/2019	USD
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2019/II	15/12/2018	31/05/2019	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2020/I	15/12/2018	31/05/2020	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2021/I	15/12/2018	31/05/2021	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2022/I	15/12/2018	31/05/2022	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2023/I	15/12/2018	31/05/2023	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2019/VIII	20/12/2018	20/12/2019	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/I	21/02/2019	21/02/2020	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/II	04/04/2019	04/04/2020	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/III	16/05/2019	16/05/2020	USD
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2024/I	30/05/2019	31/05/2024	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2025/I	30/05/2019	31/05/2025	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/IV	27/06/2019	27/06/2020	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/V	15/08/2019	15/08/2020	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/VI	26/09/2019	26/09/2020	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/VII	07/11/2019	07/11/2020	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2020/VIII	19/12/2019	19/12/2020	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2025/II	03/02/2020	26/11/2025	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2021/I	20/02/2020	20/02/2021	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/C	24/02/2020	24/10/2024	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2021/II	02/04/2020	02/04/2021	USD
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2021/III	14/05/2020	14/05/2021	USD
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2022/II	29/05/2020	31/05/2022	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2023/II	29/05/2020	31/05/2023	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2024/II	29/05/2020	31/05/2024	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2025/II	29/05/2020	31/05/2025	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2026/I	29/05/2020	31/05/2026	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2027/I	29/05/2020	31/05/2027	HUF
OTP Bank Plc.	Retail bond	OTP_VK_USD_1 2021/IV	18/06/2020	18/06/2021	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2027/I	23/07/2020	27/10/2027	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2025/III	31/05/2021	31/05/2025	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2024/III	31/05/2021	31/05/2024	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2027/II	31/05/2021	31/05/2027	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2026/II	31/05/2021	31/05/2026	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2028/I	31/05/2021	31/05/2028	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2029/I	31/05/2021	31/05/2029	HUF

Issuer	Type of security	Security name	Date of issue	Date of maturity	Ccy
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2030/I	31/05/2021	31/05/2030	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2031/I	18/08/2021	22/10/2031	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2026/III	31/03/2022	31/05/2026	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2027/III	31/03/2022	31/05/2027	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2028/II	31/03/2022	31/05/2028	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2029/II	31/03/2022	31/05/2029	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2030/II	31/03/2022	31/05/2030	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2031/I	31/03/2022	31/05/2031	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2032/I	31/03/2022	31/05/2032	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2029/A	25/07/2022	24/05/2029	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/1	18/11/2022	18/11/2025	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/1	22/12/2022	05/01/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/1	17/02/2023	17/02/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/2	10/03/2023	10/03/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/3	31/03/2023	31/03/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/4	21/04/2023	21/04/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/5	12/05/2023	12/05/2024	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2028/III	01/06/2023	31/05/2028	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2029/III	01/06/2023	31/05/2029	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2030/III	01/06/2023	31/05/2030	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2031/II	01/06/2023	31/05/2031	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2032/II	01/06/2023	31/05/2032	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2033/I	01/06/2023	31/05/2033	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/6	02/06/2023	02/06/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/7	23/06/2023	23/06/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/8	30/06/2023	30/06/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/2	30/06/2023	30/06/2025	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/9	28/07/2023	28/07/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/10	07/08/2023	07/08/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/11	01/09/2023	01/09/2024	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2032/A	20/09/2023	24/11/2032	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/12	25/09/2023	25/09/2024	HUF
OTP Bank Plc.	Retail bond	OTP_TBSZ_HUF_2028/1	13/10/2023	15/12/2028	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/13	20/10/2023	20/10/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/14	17/11/2023	17/11/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/2	15/12/2023	15/12/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2024/15	20/12/2023	20/12/2024	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/3	12/01/2024	12/01/2025	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/4	02/02/2024	02/02/2025	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/5	01/03/2024	01/03/2025	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/6	28/03/2024	28/03/2025	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2029/B	10/04/2024	20/06/2029	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/7	26/04/2024	26/04/2025	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/8	24/05/2024	24/05/2025	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2029/IV	31/05/2024	31/05/2029	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2030/IV	31/05/2024	31/05/2030	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2031/III	31/05/2024	31/05/2031	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2032/III	31/05/2024	31/05/2032	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2033/II	31/05/2024	31/05/2033	HUF
OTP Bank Plc.	Corporate bond	OTP_DK_HUF_2034/I	31/05/2024	31/05/2034	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2025/9	07/06/2024	07/06/2025	HUF
OTP Bank Plc.	Corporate bonds	OTP_HUF_2025/10	05/07/2024	05/07/2025	HUF
OTP Bank Plc.	Corporate bonds	OTP_HUF_2025/11	02/08/2024	02/08/2025	HUF
OTP Bank Plc.	Corporate bonds	OTP_HUF_2025/12	30/08/2024	30/08/2025	HUF
OTP Mortgage Bank Ltd.	Mortgage bonds	OJB2029/I	16/09/2024	31/10/2029	HUF
OTP Bank Plc.	Corporate bonds	OTP_HUF_2025/13	27/09/2024	27/09/2025	HUF
OTP Bank Plc.	Corporate bonds	OTP_HUF_2025/14	31/10/2024	31/10/2025	HUF
OTP Bank Plc.	Corporate bonds	OTP_HUF_2025/15	29/11/2024	29/11/2025	HUF
OTP Bank Plc.	Corporate bonds	OTP_HUF_2025/16	18/12/2024	18/12/2025	HUF

Companies involved in the scope of consolidation (in IFRS consolidated accounts):

	Name of the company	Country		Initial capital/Equity (in LCY)	Ownership Directly + indirectly (%)	Voting rights (%)	Classification*
1	OTP Real Estate Ltd.	Hungary	HUF	1,101,000,000	100.00	100.00	L
2	BANK CENTER No. 1. Ltd.	Hungary	HUF	11,500,000,000	100.00	100.00	L
3	OTP Fund Management Ltd.	Hungary	HUF	900,000,000	100.00	100.00	L
4	OTP Factoring Ltd.	Hungary	HUF	500,000,000	100.00	100.00	L
5	OTP Close Building Society	Hungary	HUF	2,000,000,000	100.00	100.00	L
6	Merkantil Bank Ltd.	Hungary	HUF	3,000,000,000	100.00	100.00	L
7	OTP Factoring Management Ltd.	Hungary	HUF	3,100,000	100.00	100.00	L
8	Merkantil Bérlet Ltd.	Hungary	HUF	6,000,000	100.00	100.00	L
9	OTP Mortgage Bank Ltd.	Hungary	HUF	82,000,000,000	100.00	100.00	L
10	OTP Funds Servicing and Consulting Company Limited	Hungary	HUF	2,351,000,000	100.00	100.00	L
11	DSK Bank AD	Bulgaria	BGN	1,328,659,920	99.92	99.92	L
12	POK DSK-Rodina AD	Bulgaria	BGN	10,010,198	99.85	99.85	L
13	NIMO 2002 Ltd.	Hungary	HUF	1,156,000,000	100.00	100.00	L
14	OTP Real Estate Investment Fund Management Ltd.	Hungary	HUF	100,000,000	100.00	100.00	L
15	OTP Card Factory Ltd.	Hungary	HUF	450,000,000	100.00	100.00	L
16	DSK Asset Management EAD	Bulgaria	BGN	1,000,000	100.00	100.00	L
17	OTP banka dioničko društvo	Croatia	EUR	539,156,898	100.00	100.00	L
18	Air-Invest Ltd.	Hungary	HUF	700,000,000	100.00	100.00	L
19	OTP Invest društvo s ograničenom odgovornošću za upravljanje fondovima	Croatia	EUR	2,417,030	100.00	100.00	L
20	OTP Nekretnine d.o.o.	Croatia	EUR	39,635,100	100.00	100.00	L
21	SPLC-P Ltd.	Hungary	HUF	15,000,000	100.00	100.00	L
22	SPLC Ltd.	Hungary	HUF	10,000,000	100.00	100.00	L
23	OTP Real Estate Leasing Ltd.	Hungary	HUF	214,000,000	100.00	100.00	L
24	OTP Life Annuity Real Estate Investment Plc.	Hungary	HUF	1,229,300,000	100.00	100.00	L
25	OTP Leasing d.d.	Croatia	EUR	1,067,560	100.00	100.00	L
26	Joint-Stock Company OTP Bank	Ukraine	UAH	6,186,023,111	100.00	100.00	L
27	JSC "OTP Bank" (Russia)	Russian Federation	RUB	2,797,887,853	97.92	97.92	L
28	Montenegrin Commercial Bank Share-holding Company, Podgorica Montenegro	Montenegro	EUR	181,875,221	100.00	100.00	L
29	OTP banka Srbija, joint-stock company, Novi Sad	Serbia	RSD	56,830,752,260	100.00	100.00	L
30	OTP Nekretnine doo Novi Sad	Serbia	RSD	203,783,061	100.00	100.00	L
31	OTP Ingatlanpont Ltd.	Hungary	HUF	8,000,000	100.00	100.00	L
32	OTP Hungaro-Projekt Ltd.	Hungary	HUF	27,720,000	100.00	100.00	L
33	OTP Mérnöki Ltd.	Hungary	HUF	3,000,000	100.00	100.00	L
34	LLC AMC OTP Capital	Ukraine	UAH	10,000,000	100.00	100.00	L
35	CRESCO d.o.o.	Croatia	EUR	5,170	100.00	100.00	L
36	LLC OTP Leasing	Ukraine	UAH	45,495,340	100.00	100.00	L
37	OTP Financing Solutions	Netherlands	EUR	18,000	100.00	100.00	L
38	Velvin Ventures Ltd.	Belize	USD	50,000	100.00	100.00	L
39	OTP Insurance Broker EOOD	Bulgaria	BGN	5,000	100.00	100.00	L
40	PortfoLion Venture Capital Fund Management Ltd.	Hungary	HUF	59,050,000	66.98	66.98	L
41	OTP Holding Ltd.	Cyprus	EUR	131,000	100.00	100.00	L
42	OTP Debt Collection d.o.o. Podgorica	Montenegro	EUR	49,000,001	100.00	100.00	L
43	OTP Factoring Serbia d.o.o.	Serbia	RSD	782,902,282	100.00	100.00	L
44	MONICOMP Ltd.	Hungary	HUF	320,500,000	100.00	100.00	L
45	CIL Babér Ltd.	Hungary	HUF	71,890,330	100.00	100.00	L
46	Project 01 Consulting, s. r. o.	Slovak Republic	EUR	22,540,000	100.00	100.00	L
47	R.E. Four d.o.o., Novi Sad	Serbia	RSD	1,983,643,761	100.00	100.00	L
48	OTP Financial point Ltd.	Hungary	HUF	53,000,000	100.00	100.00	L
49	OTP Mobile Service Ltd.	Hungary	HUF	1,400,000,000	100.00	100.00	L
50	OTP Holding Malta Ltd.	Malta	EUR	104,950,000	100.00	100.00	L
51	OTP Financing Malta Ltd.	Malta	EUR	105,000,000	100.00	100.00	L
52	LLC MFO "OTP Finance"	Russian Federation	RUB	6,533,000,000	100.00	100.00	L
53	OTP Travel Limited	Hungary	HUF	27,000,000	100.00	100.00	L
54	OTP Ecosystem Llc.	Hungary	HUF	281,300,000	100.00	100.00	L

* Full consolidated – L

	Name of the company	Country		Initial capital/Equity (in LCY)	Ownership Directly + indirectly (%)	Voting rights (%)	Classification*
55	DSK ventures EAD	Bulgaria	BGN	250,000	100.00	100.00	L
56	OTP Bank ESOP	Hungary	HUF	154,977,590,235	0.00	0.00	L
57	PortfoLion Digital Ltd.	Hungary	HUF	101,000,000	100.00	100.00	L
58	OTP Ingatlankezelő Ltd.	Hungary	HUF	50,000,000	100.00	100.00	L
59	OTP Leasing d.o.o. Beograd	Serbia	RSD	112,870,710	100.00	100.00	L
60	OTP Services Ltd.	Serbia	RSD	40,028	100.00	100.00	L
61	Club Hotel Füred Szálloda Ltd.	Hungary	HUF	90,000,000	100.00	100.00	L
62	DSK DOM EAD	Bulgaria	BGN	100,000	100.00	100.00	L
63	ShiwaForce.com Inc.	Hungary	HUF	114,107,000	84.92	84.92	L
64	OTP Leasing EOOD	Bulgaria	BGN	4,100,000	100.00	100.00	L
65	Regional Urban Development Fund AD	Bulgaria	BGN	250,000	52.00	52.00	L
66	Banka OTP Albania SHA	Albania	ALL	6,740,900,000	100.00	100.00	L
67	OTP Leasing Srbija d.o.o. Beograd	Serbia	RSD	314,097,580	100.00	100.00	L
68	OTP Osiguranje AKCIONARSKO DRUŠTVO ZA	Serbia	RSD	537,606,648	100.00	100.00	L
69	OTP Bank S.A.	Moldavia	MDL	100,000,000	98.26	98.26	L
70	SKB Leasing d.o.o.	Slovenia	EUR	16,809,031	100.00	100.00	L
71	SKB Leasing Select d.o.o.	Slovenia	EUR	5,000,000	100.00	100.00	L
72	OTP Home Solutions Llc.	Hungary	HUF	20,000,000	100.00	100.00	L
73	Georg d.o.o	Croatia	EUR	3,000	76.00	76.00	L
74	OTP banka d.d.	Slovenia	EUR	150,000,000	100.00	100.00	L
75	ALEJA FINANCE, FINANCNE IN DRUGE STORITVE, D.O.O.	Slovenia	EUR	500,000	100.00	100.00	L
76	OTP Luxembourg S.à r.l.	Luxembourg	EUR	2,711,440	100.00	100.00	L
77	Foglaljorvost Online Ltd	Hungary	HUF	7,202,400	100.00	100.00	L
78	OD Ltd.	Hungary	HUF	6,000,000	60.00	60.00	L
79	JN Parkoló Ltd.	Hungary	HUF	11,000,000	100.00	100.00	L
80	JSCMB "IPOTEKA BANK"	Uzbekistan	UZS	3,834,217,638,941	79.82	98.98	L
81	OTP INVEST DRUŠTVO ZA UPRAVLJANJE UCITS I ALTERNATIVNIM FONDOVIMA AD BEOGRAD	Serbia	RSD	411,432,000	100.00	100.00	L
82	Hello Pay IT and Service cPlc.	Hungary	HUF	5,000,000	100.00	100.00	L
83	LLC OTP Financial Technologies	Russian Federation	RUB	10,000	100.00	100.00	L
84	ZAGREBTOWER D.O.O.	Croatia	EUR	2,036,890	100.00	100.00	L
85	PortfoLion Munkavállalói Résztulajdonosi Program Szervezet	Hungary	HUF	2,030,000,000	0.00	0.00	L
86	Balansz Real Estate Institute Fund	Hungary	HUF	100,428,671,936	100.00	100.00	L
87	PortfoLion Zöld Fund	Hungary	HUF	37,500,000,000	100.00	100.00	L
88	PortfoLion Digitális Magántőkealap I.	Hungary	HUF	7,000,000,000	100.00	100.00	L
89	PortfoLion Regionális Fund II.	Hungary	HUF	25,060,000,000	49.88	49.88	L
90	PortfoLion Partner Fund	Hungary	HUF	72,004,608,295	30.56	30.56	L
91	PortfoLion Digitális Magántőkealap II.	Hungary	HUF	14,000,000,000	100.00	100.00	L
92	"Nemesszalóki Mezőgazdasági "Állattenyésztési, Növénytermesztési, Termelő és Szolgáltató Ltd.	Hungary	HUF	924,124,000	100.00	100.00	L
93	ZA-Invest Béta Ltd.	Hungary	HUF	8,000,000	100.00	100.00	L
94	NAGISZ Mezőgazdasági Termelő és Szolgáltató Ltd.	Hungary	HUF	3,802,080,000	100.00	100.00	L
95	Nádudvari Élelmiszer Feldolgozó és Kereskedelmi Ltd.	Hungary	HUF	1,954,680,000	99.96	99.96	L
96	HAGE Ltd.	Hungary	HUF	2,689,000,000	99.61	99.61	L
97	AFP Private Equity Invest Ltd.	Hungary	EUR	452,000	29.14	29.14	L
98	Mendota Invest, Nepremicninska druzba, d.o.o.	Slovenia	EUR	257,500	100.00	100.00	L
99	ZA-Invest Delta Ltd.	Hungary	HUF	4,000,000	100.00	100.00	L
100	ZA-Invest Kappa Ltd.	Hungary	HUF	11,000,000	100.00	100.00	L
101	ZA Invest Gamma Ltd.	Hungary	HUF	3,100,000	100.00	100.00	L
102	ZA Gamma HoldCo Ltd.	Hungary	HUF	3,100,000	100.00	100.00	L
103	Aranykalász 1955. Ltd	Hungary	HUF	55,560,000	75.00	100.00	L
104	AGROMAG-PLUSZ Ltd.	Hungary	HUF	39,110,000	73.25	98.34	L
105	ARANYMEZŐ 2001. Ltd	Hungary	HUF	3,000,000	75.00	100.00	L
106	Agricultural Privatey Held Joint-Stock Company Szekszárd	Hungary	HUF	862,000,000	100.00	100.00	L
107	Szajk Agricultural Closed Company Limited by shares	Hungary	HUF	659,859,000	100.00	100.00	L

* Full consolidated – L