LOBBYING POLICY

OTP Bank is committed to conducting its business fairly and in compliance with applicable laws and regulations, while contributing to the prosperity of its stakeholder communities and the protection of natural resources. Its objective is to support the success of customers and businesses through its financial services and the continuous development of financial literacy. Accordingly, OTP Bank engages in advocacy and lobbying activities regarding issues affecting the banking and financial sector and of importance to the Bank, while taking into account the interests of its shareholders, employees, customers, and partners. In this context, OTP Bank regularly and systematically monitors legislative developments in Hungary, the European Union, and all countries in which OTP Group operates. In addition, it maintains continuous relationships with supervisory authorities, regulatory bodies, public administration institutions, and professional associations, such as the Hungarian Banking Association.

OTP Bank participates in the work of Hungarian and international professional advocacy associations that it considers significant and that represent the interests of the financial sector. In cooperation with such organizations, and in line with their established principles and objectives, OTP Bank carries out lobbying activities. OTP Bank also seeks to contribute to advancing and developing the Hungarian financial sector by participating in the formulation of banking regulations that are sufficiently flexible while remaining appropriately precise, and by promoting rules that are readily implementable in practice while ensuring competitive neutrality and prudent operating conditions.

OTP Bank is also a member of certain international organizations engaged in activities aimed at improving public policy decision-making in matters affecting the financial services sector. These organizations are typically listed in the joint Transparency Register of the European Parliament, the Council of the European Union, and the European Commission (for example, ICMA or ESBG/WSBI), in which OTP Bank itself is also registered in the interest of transparency. However, OTP Bank's memberships in professional associations do not restrict the Bank from expressing differing views or representing alternative positions in accordance with its own strategy.

OTP Bank considers the achievement of sustainability objectives to be of paramount importance and therefore organizes its day-to-day operations in line with these principles. The Bank strives to play an active role in shaping a more sustainable future through its advocacy activities and has therefore joined a number of professional advocacy associations dedicated to sustainable development in recent years, including the United Nations Environment Programme Finance Initiative (UNEP FI) and the Business Council for Sustainable Development in Hungary.

OTP Bank also seeks to place a strong emphasis on transparency within its internal policies. Accordingly, the Bank has developed a dedicated internal regulation on advocacy and lobbying activities, which defines the framework of OTP Bank's activities within Hungarian and international professional associations, as well as the rules applicable to its representatives. By adopting this regulation, OTP Bank aims to ensure high-quality, conscious, and sustainable advocacy activities.

Principles

In pursuing its advocacy activities, OTP Bank communicates openly and transparently with stakeholders, authorities, public administration bodies, and their officials, in accordance with applicable legal requirements and in line with OTP Bank's Code of Ethics, anti-corruption policy, and related procedures.

OTP Bank's advocacy activities primarily focus on issues affecting its business operations, with an emphasis on practical, solution-oriented approaches. The Bank pays particular attention to topics that may foster developments within the financial sector (especially digitalization), promote the broad and non-discriminatory accessibility of financial products, and increase investment in lower-emission technologies from an environmental perspective.

Participation in Hungarian Professional Associations: Involvement in the Hungarian Banking Association

OTP Bank primarily and predominantly pursues its advocacy activities through the Hungarian Banking Association and participates in shaping and representing the official professional position of the domestic banking sector. As part of these activities–and together with other participants in the sector, it plays an active role in reviewing and commenting on legislation affecting the financial sector. In addition, OTP Bank participates in the work of the Responsible Corporate Governance Committee of the Budapest Stock Exchange and the Investment Service Providers Association in this regard.

Through its continuous and active participation in the activities of the Hungarian Banking Association, OTP Bank has on numerous occasions contributed–and intends to continue contributing–to the development and refinement of a regulatory environment that supports the operation and growth of the banking sector by participating in the review of Hungarian and EU legislative proposals affecting the financial sector. In this context, OTP Bank, for example, actively participated in the drafting and assessment of financial legislative proposals discussed during Hungary's rotating Presidency of the Council of the European Union and within the framework of the relevant Trio Presidency.

Within the framework of its work in professional associations–and in the manner permitted by applicable laws and regulations–OTP Bank regularly formulates regulatory proposals and proposal packages aimed at advancing the interests of the financial sector and its participants.

The competent experts of OTP Bank (and certain Hungarian group members, namely OTP Mortgage Bank Ltd., OTP Housing Savings Fund Ltd., and Merkantil Bank Ltd.) actively participate in the work of all working groups within the Hungarian Banking Association, and several working groups are chaired by employees of OTP Bank. OTP Group is also represented on the Board of the Hungarian Banking Association; the Chief Executive Officer of OTP Mortgage Bank and OTP Housing Savings Fund participates in advocacy activities as a Vice President elected by the member banks. Through the Hungarian Banking Association, OTP Bank also conducts indirect advocacy activities within international organizations (e.g., the European Banking Federation and the European Mortgage Federation).

Independent Advocacy Activities

As part of its independent advocacy efforts, OTP Bank engages with ministries, European Union Bodies and other public authorities in order to ensure that draft legislation, enacted legislation, and other soft-law instruments implementing such legislation are developed, formulated, or amended with due consideration to the perspectives of OTP Bank and the banking sector as a whole.

This statement has been prepared on the basis of the UN Principles for Responsible Banking and the OECD Guidelines for Multinational Enterprises.