



Statement on principal adverse impacts of investment decisions on sustainability factors

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Reference period: from 1 January 2025 to 31 December 2025

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Financial market participant: OTP Bank Plc. (LEI: 529900W3MOO00A18X956)

Summary

OTP Bank Plc. (LEI: 529900W3MOO00A18X956) takes into consideration the principal adverse impacts of its investment decisions on sustainability factors. This Statement is a consolidated statement on the principal adverse impacts of OTP Bank Plc. on sustainability factors.

The reference period for this Statement on the principal adverse impacts on sustainability factors is from 1 January 2025 to 31 December 2025.

As a market operator performing portfolio management services, OTP Bank Plc. has taken into consideration the principal adverse impacts of its investment decisions on sustainability factors for the period between 1 January 2025 and 31 December 2025. The aforementioned sustainability factors are environmental, social and employee issues, respect for human rights, and issues related to the fight against corruption and bribery, which can be measured or estimated with so-called adverse impact indicators.

The SFDR¹ framework requires the consideration of 18 mandatory indicators, including greenhouse gas emissions, biodiversity, water, waste and social indicators, which apply to companies, states and supranational corporations, as well as, where applicable, real estate assets. In addition, the SFDR defines 22 additional climate and other environmental indicators, as well as 24 additional indicators in the field of social and employee issues, respect for human rights, anti-corruption and anti-bribery, from which financial market operators must select at least one environmental and one social indicator.

The mandatory adverse impact indicators, as well as the selected additional indicators are regularly monitored by OTP Bank Plc., for which OTP Bank Plc. has extended its existing contract with the external data provider (MSCI).

Based on this Statement – broken down by indicator in the summary table – investors can learn about the development of the indicators related to the portfolios managed by the Bank, also compared to previous years.

In 2025, the majority of climate change and other environmental indicators tend to show a deterioration compared to previous years. We do not know the exact reasons for this, but it is important to note that a significant part of the indicators included in the Statement are absolute indicators, so their value may increase in itself due to the increase in the total value of the portfolio. On the other hand, it is also important to see that the Bank currently does not have a dedicated ESG portfolio management service, so the managed portfolios largely reflect the general state of the global economy, including in terms of adverse effects. We do not see any significant changes or general trends in the majority of social indicators: some indicators showed some improvement, others showed a slight deterioration in 2025, and the values of several indicators stabilized at a low (i.e. favorable) level. A significant deterioration can be observed in the ratio of investments made in investment-receiving companies that do not apply workplace accident prevention policies.

In addition to monitoring the development of the indicators, OTP Bank Plc. also takes adverse effects into account by applying an exclusion list for certain activities with adverse environmental or social impacts, and applies it in terms of investments within the framework of portfolio management activities. Exclusions may therefore be directly suitable for mitigating adverse impacts associated with investments.

These exclusions apply uniformly to all managed portfolios. A detailed list of exclusions is provided in the section “Description of policies to identify and prioritise principal adverse impacts on sustainability factors” of this Statement.

Please note that the content of this Statement greatly depends on the availability and quality of data on specific adverse impact indicators or changes in the methodology used by the external data provider. It is in this context that we prepare our report on the principal adverse impacts of the financial instruments included in the portfolios managed by OTP Bank Plc.

Description of the principal adverse impacts on sustainability factors

The table below provides information on both mandatory and optional indicators on the principal adverse impacts on sustainability factors, climate or environment, as well as social and labour issues, respect for human rights, anti-corruption and anti-bribery. OTP Bank Plc. hereby draws attention to the fact that it regularly publishes the comparison of individual indicators with the previous reporting period, as required by law, on an annual basis.

Please note that this Statement contains data for 2022, 2023, and 2024 that was updated in 2025, while the data for 2025 were calculated in 2026.

¹ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

Indicators applicable to investments in investee companies

Indicator concerning adverse sustainability impacts	Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS								
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	4,090.29 Data coverage for the managed portfolio: 100.00%, of which 97.89% is reported and 2.11% is estimated.	3,946.52 Data coverage for the managed portfolio: 100.00%, of which 99.94% is reported and 0.06% is estimated.	1,570.61 Data coverage for the managed portfolio: 99.95%, of which 99.53% is reported and 0.43% is estimated.	4,366.36 Data coverage for the managed portfolio: 94.74%, of which 94.68% is reported and 0.06% is estimated.	Sum of portfolio companies' Carbon Emissions – Scope 1 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	The data was collected based on data provided by the external data provider. In 2025, OTP Bank Plc. monitored the principal adverse impact indicators based on data provided by the external data provider using a quarterly self-service report on the entire portfolio of managed assets. Considering the size of the portfolio management activity, the size of the portfolio managed, and the fact that only portfolios specified in Article 6 of Regulation (EU) 2019/2088 (SFDR) were managed, the Bank did not perform any further analysis.
		Scope 2 GHG emissions	938.71 Data coverage for the managed portfolio: 100.00%, of which 96.23% is reported and 3.77% is estimated.	870.96 Data coverage for the managed portfolio: 100.00%, of which 98.25% is reported and 1.75% is estimated.	624.89 Data coverage for the managed portfolio: 99.95%, of which 99.19% is reported and 0.76% is estimated.	402.15 Data coverage for the managed portfolio: 94.74%, of which 91.65% is reported and 3.08% is estimated.	Sum of portfolio companies' carbon emissions – Scope 2 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	
		Scope 3 GHG emissions	58,255.56 Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	53,843.55 Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	45,203.71 Data coverage for the managed portfolio: 99.96%, of which 0% is reported and 99.96% is estimated.	26,936.33 Data coverage for the managed portfolio: 94.74%, of which 0% is reported and 94.74% is estimated.	Sum of portfolio companies' carbon emissions – Scope 3 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	

	Total GHG emissions	63,885.06 Data coverage for the managed portfolio: 99,98%, of which 0% is reported and 99,98% is estimated.	58,642.92 Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	47,411.90 Data coverage for the managed portfolio: 99.95%, of which 0% is reported and 99.95% is estimated.	31,673.4 Data coverage for the managed portfolio: 94.74%, of which 0% is reported and 94.74% is estimated.	The total annual Scope 1, Scope 2 and estimated Scope 3 GHG emissions associated with the market value of the portfolio.
2. Carbon footprint	Carbon footprint	628.47 Data coverage for the managed portfolio: 99,98%, of which 0% is reported and 99,98% is estimated.	580.41 Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	531.59 Data coverage for the managed portfolio: 99.95%, of which 0% is reported and 99.95% is estimated.	446.01 Data coverage for the managed portfolio: 94.74%, of which 0% is reported and 94.74% is estimated.	The total annual Scope 1, Scope 2 and estimated Scope 3 GHG emissions associated with 1 million EUR of portfolio value. (tCO2/EUR million)
3. GHG intensity of investee companies	GHG intensity of investee companies	712.40 Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated	843.31 Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	731.12 Data coverage for the managed portfolio: 99.97%, of which 0% is reported and 99.97% is estimated.	905.95 Data coverage for the managed portfolio: 94.74%, of which 0% is reported and 94.74% is estimated.	GHG intensity of portfolio-owned issuers (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/million EUR revenue).
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6.13% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	5.91% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	0.63% Data coverage for the managed portfolio: 99.97%, of which 99.97% is reported and 0% is estimated.	4.35% Data coverage for the managed portfolio: 94.74%, of which 94.74% is reported and 0% is estimated.	The percentage of the portfolio's market value exposed to issuers pursuing fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal.
5. Share of	Share of non-renewable	62.62%	62.64%	55.72%	55.99%	The portfolio's weighted average of

non-renewable energy consumption and production	energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources		Data coverage for the managed portfolio: 72.62%, of which 72.62% is reported and 0% is estimated.	Data coverage for the managed portfolio: 94.48%, of which 94.48% is reported and 0% is estimated.	Data coverage for the managed portfolio: 91.97%, of which 91.97% is reported and 0% is estimated.	Data coverage for the managed portfolio: 78.42%, of which 78.42% is reported and 0% is estimated.	issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy used and/or generated.
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	NACE Code A (Agriculture, Forestry and Fishing) ⁱ	n/a	n/a	n/a	n/a	Energy consumption in GWh per million EUR of revenue of investee companies. N/a indicates that there is no data for the indicator, i.e. the coverage indicator at portfolio level is 0%.
		NACE Code B (Mining and Quarrying) ⁱ	n/a	n/a	0.81	n/a	
		NACE Code C (Manufacturing) ⁱ	0.11	0.10	0.10	0.08	
		NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply) ⁱ	0.39	0.15	0.41	0.15	
			Data coverage for the managed portfolio: 96.61%, of which 96.61% is reported and 0% is estimated.	Data coverage for the managed portfolio: 97.46%, of which 97.46% is reported and 0% is estimated.	Data coverage for the managed portfolio: 98.40%, of which 98.40% is reported and 0% is estimated.	Data coverage for the managed portfolio: 88.35%, of which 88.35% is reported and 0% is estimated.	
			Data coverage for the managed portfolio: 96.61%, of which 96.61% is reported and 0% is estimated.	Data coverage for the managed portfolio: 97.46%, of which 97.46% is reported and 0% is estimated.	Data coverage for the managed portfolio: 98.40%, of which 98.40% is reported and 0% is estimated.	Data coverage for the managed portfolio: 88.35%, of which 88.35% is reported and 0% is estimated.	

				is estimated.
NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities) ⁱ	n/a	n/a	n/a	n/a
NACE Code F (Construction) ⁱ	n/a	n/a	0.04 Data coverage for the managed portfolio: 98.40%, of which 98.40% is reported and 0% is estimated.	n/a
NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) ⁱ	0.06 Data coverage for the managed portfolio: 96.61%, of which 96.61% is reported and 0% is estimated.	0.06 Data coverage for the managed portfolio: 97.46%, of which 97.46% is reported and 0% is estimated.	0.07 Data coverage for the managed portfolio: 98.40%, of which 98.40% is reported and 0% is estimated.	0.08 Data coverage for the managed portfolio: 88.35%, of which 88.35% is reported and 0% is estimated.
NACE Code H (Transportation and Storage) ⁱ	0.85 Data coverage for the managed portfolio: 96.61%, of which 96.61% is reported and 0% is estimated.	1.00 Data coverage for the managed portfolio: 97.46%, of which 97.46% is reported and 0% is estimated.	0.53 Data coverage for the managed portfolio: 98.40%, of which 98.40% is reported and 0% is estimated.	0.81 Data coverage for the managed portfolio: 88.35%, of which 88.35% is reported and 0% is estimated.
NACE Code	1.03	1.05	0.92	1.05

			L (Real Estate Activities) ⁱ	Data coverage for the managed portfolio: 96.61%, of which 96.61% is reported and 0% is estimated.	Data coverage for the managed portfolio: 97.46%, of which 97.46% is reported and 0% is estimated.	Data coverage for the managed portfolio: 98.40%, of which 98.40% is reported and 0% is estimated.	Data coverage for the managed portfolio: 88.35%, of which 88.35% is reported and 0% is estimated.	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	19.59%	Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	Data coverage for the managed portfolio: 99.97%, of which 0% is reported and 99.97% is estimated.	Data coverage for the managed portfolio: 94.74%, of which 0% is reported and 94.74% is estimated.	The percentage of the portfolio's market value exposed to issuers that reported having operations in or near biodiversity-sensitive areas and being involved in controversies with severe or very severe impacts on the environment.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.28	Data coverage for the managed portfolio: 12.01%, of which 12.01% is reported and 0% is estimated.	Data coverage for the managed portfolio: 12.69%, of which 12.69% is reported and 0% is estimated.	Data coverage for the managed portfolio: 9.61%, of which 9.61% is reported and 0% is estimated.	Data coverage for the managed portfolio: 0.25%, of which 0.25% is reported and 0% is estimated.	The total annual wastewater (on metric tons) discharged into surface waters as a result of industrial or manufacturing activities per EUR 1 million of portfolio value. N/a indicates that there is no data for the indicator, i.e. the coverage indicator at portfolio level is 0%.
Waste	9. Hazardous waste and radioactive	Tonnes of hazardous waste and radioactive waste generated by investee companies per	0.72	Data coverage for the managed portfolio: 44.22%,	Data coverage for the managed portfolio: 46.00%,	Data coverage for the managed portfolio: 34.31%,	Data coverage for the managed portfolio:	The total annual hazardous waste per EUR 1 million of portfolio value.

	e waste ratio	million EUR invested, expressed as a weighted average	of which 44.22% is reported and 0% is estimated.	of which 46.00% is reported and 0% is estimated.	of which 34.31% is reported and 0% is estimated.	37.29%, of which 37.29% is reported and 0% is estimated.		
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS								
Social and employee matters	10. Violations of UN Global Compact Principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinationals	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00% Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	0.00% Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	0.00% Data coverage for the managed portfolio: 99.97%, of which 0% is reported and 99.97% is estimated.	0% Data coverage for the managed portfolio: 94.74%, of which 0% is reported and 94.74% is estimated.	<p>The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.</p> <p>The MSCI factor data behind adverse impact indicator no. 10 also includes the "Overall Flag" and OECD compliance indicators on the exclusion list, which are suitable for assessing certain sustainability factors of a company or investment fund.</p> <p>In 2024, there was no asset in the portfolio whose issuer, based on the available data, violated the principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises. (The indicator remained at 0% throughout the</p>	<p>The data was collected based on data provided by the external data provider.</p> <p>In 2025, OTP Bank Plc. monitored the principal adverse impact indicators based on data provided by the external data provider using a quarterly self-service report on the entire portfolio of managed assets. Considering the size of the portfolio management activity, the size of the portfolio managed, and the fact that only portfolios specified in Article 6 of Regulation (EU) 2019/2088 (SFDR) were managed, the Bank did not perform any further analysis.</p> <p>Some principal adverse impacts were taken into account through an exclusion list, which procedure the Bank intends to maintain in the future, by also aiming to continuously improve</p>

							period between 2022 and 2024.)	its decision-making processes.
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	0.00% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	0.01% Data coverage for the managed portfolio: 99.97%, of which 99.97% is reported and 0% is estimated.	0% Data coverage for the managed portfolio: 94.74%, of which 94.74% is reported and 0% is estimated.	The percentage of the portfolio's market value exposed to issuers that are not signatories to the UN Global Compact. The reporting methodology behind adverse impact indicator No. 11 in this table was modified in the year 2023 to include an expanded set of measures adopted by investee companies to comply with the procedures and compliance mechanisms to monitor compliance with UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises.		In connection with adverse indicator No. 10 of this table (Violations of UN Global Compact Principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises), the Bank introduced a restriction, which is based on the external data provider's so-called "Overall Flag" and OECD compliance indicator. We provide more information on this in the section regarding the "Methodology for the identification and evaluation of principal adverse effects".
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	10.75% Data coverage for the managed portfolio: 30.06%, of which 30.06% is reported and 0% is estimated.	9.47% Data coverage for the managed portfolio: 35.49%, of which 35.49% is reported and 0% is estimated.	14.01% Data coverage for the managed portfolio: 37.30%, of which 37.30% is reported and 0% is estimated.	11.37 Data coverage for the managed portfolio: 29.55%, of which 29.55% is reported and 0% is estimated.	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.		

13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	26.66% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	27.59% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	27.02% Data coverage for the managed portfolio: 99.97%, of which 99.97% is reported and 0% is estimated.	28.45% Data coverage for the managed portfolio: 94.74%, of which 94.74% is reported and 0% is estimated.	The portfolio holdings' weighted average of the percentage of board members who are female.	
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	0.00% Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.	0.05% Data coverage for the managed portfolio: 99.97%, of which 99.97% is reported and 0% is estimated.	0.00% Data coverage for the managed portfolio: 94.74%, of which 94.74% is reported and 0% is estimated.	The percentage of the portfolio's market value exposed to issuers with industry links to landmines, cluster munitions, chemical weapons or biological weapons. Comment: Industry relations include ownership, manufacturing and investments.	The data was collected based on data provided by the external data provider. In 2025, OTP Bank Plc. monitored the principal adverse impact indicators based on data provided by the external data provider using a quarterly self-service report on the entire portfolio of managed assets. Considering the size of the portfolio management activity, the size of the portfolio managed, and the fact that only portfolios specified in Article 6 of Regulation (EU) 2019/2088 (SFDR) were managed, the Bank did not perform any further analysis. During 2025, OTP Bank Plc. applied a screening system based on an exclusion list for Exposure to

								<p>controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons), the maximum extent of which may be 5% of the total managed portfolio value.</p> <p>In 2024, the share of investments in investee companies involved in the manufacture or sale of controversial weapons did not exceed 5%, and in fact remained close to 0% between 2022 and 2024. OTP Bank Plc. will also maintain this restriction during 2024.</p>
Indicators applicable to investments in sovereigns and supranationals								
Indicator concerning adverse sustainability impacts		Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	<p>368.64%</p> <p>Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.</p>	<p>309.91%</p> <p>Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.</p>	<p>312.98</p> <p>Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.</p>	<p>328.88</p> <p>Data coverage for the managed portfolio: 100%, of which 100% is reported and 0% is estimated.</p>	<p>The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP)</p>	<p>The data was collected based on data provided by the external data provider.</p> <p>In 2025, OTP Bank Plc. monitored the principal adverse impact indicators based on data provided by the external data provider using a</p>

									<p>quarterly self-service report on the entire portfolio of managed assets. Considering the size of the portfolio management activity, the size of the portfolio managed, and the fact that only portfolios specified in Article 6 of Regulation (EU) 2019/2088 (SFDR) were managed, the Bank did not perform any further analysis.</p> <p>Some principal adverse impacts were taken into account through an exclusion list, which procedure the Bank intends to maintain in the future, by also aiming to continuously improve its decision-making processes.</p> <p>The indicators remained at 0 and 0% throughout the period between 2022 and 2025.</p>
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations, as referred to in	absolute number	0	0	0	0	0	<p>The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports and the</p>
				Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.	Data coverage for the managed portfolio: 100%, of which 0% is reported and 100% is estimated.		

Indicators applicable to investments in investee companies								
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS								
Water, waste and substance emissions	13. Non-recycled waste ratio	Tonnes of non-recycled waste generated by investee companies per million EUR invested, expressed as a weighted average	1.09 Data coverage for the managed portfolio: 32.62%, of which 32.62% is reported and 0% is estimated.	1.77 Data coverage for the managed portfolio: 45.33%, of which 45.33% is reported and 0% is estimated.	0.81 Data coverage for the managed portfolio: 30.80%, of which 30.80% is reported and 0% is estimated.	0.54 Data coverage for the managed portfolio: 29.69%, of which 29.69% is reported and 0% is estimated.	The total annual non-recycled waste (metric tons reported) per 1 million EUR invested in the portfolio.	The data was collected based on data provided by the external data provider. In 2025, OTP Bank Plc. monitored the principal adverse impact indicators based on data provided by the external data provider using a quarterly self-service report on the entire portfolio of managed assets. Considering the size of the portfolio management activity, the size of the portfolio managed, and the fact that only portfolios specified in Article 6 of Regulation (EU) 2019/2088 (SFDR) were managed, the Bank did not perform any further analysis. Some principal adverse impacts were taken into account through an exclusion list, which procedure the Bank intends to maintain in the future, by also aiming to continuously improve its decision-making processes.
Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters								
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS								
Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies								
Social and employee matters	1. Investments in companies without workplace	Share of investments in investee companies without a workplace accident prevention policy	37,53% Data coverage for the managed	0% Data coverage for the managed	0.065% Data coverage for the managed	0% Data coverage for the managed	The percentage of the portfolio's market value exposed to	The data was collected based on data provided by the external data provider. In the year 2024, OTP Bank Plc., on the basis of the data provided by the external data provider, monitored the principal adverse indicators on a

	accident prevention policies		portfolio: 100%, of which 100% is reported and 0% is estimated.	portfolio: 100%, of which 100% is reported and 0% is estimated.	portfolio: 99.97%, of which 99.97% is reported and 0% is estimated.	portfolio: 94.74%, of which 94.74% is reported and 0% is estimated.	issuers without a workplace accident prevention policy. N/a indicates that there is no data for the indicator, i.e. the coverage indicator at portfolio level is 0%. Coverage increased compared to last year either due to an increase in reported data or a change in the composition of the portfolio.	quarterly basis using the so-called self-service report pertaining to the entirety of portfolio-managed assets. Considering the size of the portfolio management activity, the size of the portfolio managed, and the fact that only portfolios specified in Article 6 of Regulation (EU) 2019/2088 (SFDR) were managed, the Bank did not perform any further analysis. Some principal adverse impacts were taken into account through an exclusion list, which procedure the Bank intends to maintain in the future, by also aiming to continuously improve its decision-making processes.
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In 2024, based on a decision by the Group Investment Committee, the exclusion list was supplemented with factors related to the cannabis industry, the tobacco industry and gambling, and factors indicating violations of the Organisation for Economic Co-operation and Development (OECD) guidelines for multinational enterprises. Therefore, OTP Bank Plc. uses, in addition to the indicators presented above, **other indicators** related to the cannabis industry, tobacco industry, gambling and the OECD Guidelines for Multinational Enterprises indicator to identify and assess other principal adverse impacts on the sustainability factor.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

The Board of Directors of OTP Bank Plc. adopted a policy on 23 June 2023 to identify and prioritise the principal adverse impacts on sustainability factors. Based on the data provided by the external data provider, the Bank regularly monitors principal adverse impact indicators.

Overall, the Bank applies the following exclusion policies and limits in its portfolio management activities in relation to environmental and/or social factors:

- Exposure to controversial weapons (PAI 14)

- Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (linked to PAI 10, based on the MSCI “overall flag” indicator)
- Exposure to the cannabis industry
- Exposure to the tobacco industry
- Exposure to the gambling industry
- Violation of OECD guidelines

Responsibility for implementation in the organisation

OTP Bank Plc. is committed to implementing into its existing processes and operation all material issues to make its business activity – and that of its customers – more environmentally and socially sustainable.

OTP Bank Plc. has defined a three-level responsibility system:

- a/ Group Investment Committee
- b/ Organizational unit responsible for risk management
- c/ Organizational unit responsible for portfolio management

The Group Investment Committee is responsible for developing the policy for identifying and prioritising adverse impacts, ensuring compliance therewith and deciding on the exclusion list. It is also responsible for the high-standard implementation of the policy for identifying and prioritising adverse impacts and also obtains information from the Portfolio Management Department on its activities to identify and assess sustainability-related principal adverse impacts. The Group Investment Committee is composed of the Banking Group's investment services managers and is chaired by the head of the directorate responsible for investment services.

The organisational unit responsible for risk management is in charge of monitoring and controlling the ESG limits for the sustainability risk defined for the portfolio management activity.

The day-to-day responsibility for the implementation of the framework for principal adverse impacts lies with the members of staff of the organisational unit responsible for portfolio management.

In addition to the above, an ESG Committee operates as a standing committee of OTP Bank Plc. The Chairman of the Committee is appointed by the Board of Directors and its members are the Deputy CEOs and Managing Directors of OTP Bank Plc. Its tasks are to

- a/ identify ESG business opportunities and risks within the Bank and the Banking Group;
- b/ formulate the ESG strategy, plans and policies; and
- c/ take responsibility for ESG target setting, performance target setting and evaluation.

In this context, the ESG Committee has been given access to the Group Investment Committee's agenda and ESG relevant proposals related to each agenda item, where ESG relevant topics and decisions are expected to be discussed at the meetings, with regard to materials; furthermore, the agenda of the Group Investment Committee meetings, and, in the case of ESG relevance, the materials thereof shall be sent to the ESG Committee. The delegate of the ESG Committee, if he/she so requests, shall attend the Group Investment Committee meeting as an invitee. In the case of a proposal with ESG implications on the agenda of the Group Investment Committee, the opinion of the ESG Committee delegate shall be sought when taking a decision.

The directorate responsible for marketing and communications of OTP Bank Plc. is responsible for the management and coordination of corporate social responsibility and for the preparation of the Sustainability Report.

Methodology for the identification and evaluation of the principal adverse effects

In identifying and assessing the main adverse impacts – with regard to their social and ethical aspects – indicator number 14 in the table above (“Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)”) was ranked as a priority in so far as it is also subject to an exclusion policy. The

main consideration behind highlighting the aforementioned adverse impact was the severity of the potential adverse impacts, as controversial weapons can have serious social and even environmental impacts that are potentially irreparable. In addition, adverse impact indicator number 10 (Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises) was also highlighted, in connection with which the Bank uses the so-called Overall Flag or OECD compliance indicator (see below in more detail). The main argument for prioritising this indicator was that it captures both environmental and social effects.

The Bank identified the following indicators as relevant among the other adverse impact indicators: “Non-recycled waste ratio” and “Investments in companies without workplace accident prevention policies”. The Bank selected these optional indicators by assessing the potential severity, likelihood and recoverability. The adverse impact of “non-recycled waste” can be widespread across regions and company sizes, while its inclusion in the Bank’s PAI framework also strengthens the circular economy perspective. In the case of the indicator “Investments in companies without workplace accident prevention policies”, the selection is justified by the severity and irreversible nature of the consequences, since the absence of such policies in a company can lead to accidents resulting in loss of human life and irreparable damage to society.

In addition, the Bank uses other adverse impact indicators in its exclusions (exposure to the cannabis industry, exposure to the tobacco industry, exposure to the gambling industry, violation of OECD guidelines), the main consideration behind the identification of which was to capture a wider range of social impacts.

Given the scale of the portfolio management activity, the size of the managed portfolio, and the fact that only portfolios pursuant to Article 6 of the SFDR are managed, i.e. the Bank does not manage portfolios promoting environmental or social characteristics or specifically targeting sustainable investments within the framework of its portfolio management activity, the Bank does not conduct further analysis and does not take into account the likelihood and severity of the occurrence of the main adverse impacts, as well as their potentially irreparable nature, in addition to the above.

In order to take into account the principal adverse impacts of its investment decisions on sustainability factors, OTP Bank Plc. applies a screening system based on an exclusion list during its portfolio management activities in relation to certain adverse impact indicators identified by it and assessed as particularly relevant, as follows:

The first exclusion applies to indicator 14 (Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)) in the table above, within the framework of which securities issued by companies involved in the production or sale of so-called controversial weapons may be included in the portfolios at a maximum value of 5%.

During the portfolio management activity, the Bank also took into account the so-called Overall Flag indicator, which is related to the adverse impact indicator number 10 (Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises) from the indicators available from the MSCI data provider, in the table above. This indicator is suitable for assessing the adverse impacts of a company or investment fund on certain sustainability factors, and may also indicate corporate governance deficiencies. The indicator shows whether there is a notable inconsistency in the way a company operates and/or its products, and the severity of the social or environmental impact of the inconsistency. The ‘Overall Flag’ can take one of four values depending on the severity of the identified inconsistency. Of these, the category of the most serious corporate conduct at issue is for companies or investment funds that are directly involved in one or more of the behaviours or omissions that constitute violations of the referenced international guidelines. The Portfolio Management Department invests in securities of companies or investment funds of companies whose ‘Overall Flag’ indicator falls into this most controversial category, up to a maximum of 25% of the total value of the portfolios managed.

In addition to the above, in 2024, based on the decision of the Group Investment Committee, the exclusion list was supplemented with factors restricting the cannabis industry, the tobacco industry, gambling and OECD alignment. Of these, the 5% limit for deviation from OECD alignment is linked to indicator number 10.

The margin of error of the methodology:

Please note that the content of this Statement, including the selection of optional indicators, is highly dependent on the availability and quality of data related to specific adverse impact indicators, changes in the calculation methods and models used by the external data provider, and changes in the size and composition of the managed portfolio. Due to changes in the external data provider’s model, some of the adverse impact indicators showed different rates at different query times.

Data sources used:

In order to identify and rank the principal adverse impacts on sustainability factors, OTP Bank Plc. contracted an external data provider. The source of the indicators applicable to the investments in investee companies included in this Statement is the external data provider (MSCI).

Engagement policy

OTP Bank Plc., as a financial market participant, takes into account the principle of social, environmental and ethical accountability in the exercise of voting rights and other rights attached to shares in investee companies that are subject to the scope of the Engagement Policy, i.e. companies where the proportion of voting rights held by OTP Bank Plc. reaches 1 percent or their value reaches 1 percent of the value of the portfolio managed by OTP Plc. on a sustained basis for a period exceeding 1 year.

The provisions of Section G) of the Engagement Policy regarding indicators of adverse impact on sustainability factors shall apply – unlike the previous ones – regardless of the proportion of voting rights in the Company.

Within the framework of the portfolio management service, the Bank, as a general rule, is not entitled to exercise voting rights on behalf of the client at general meetings of the issuers of the shares managed in the portfolio. The Bank represents its clients at general meetings only on the basis of an express provision in the relevant contract and on the basis of a specific authorisation from the client.

Among the mandatory and other indicators related to principal adverse impact indicators on social, environmental, and corporate governance, the Bank considers exposure to the following indicators—which are included in the portfolio management exclusion list—within the framework of its Engagement Policy:

1. an indicator signaling exposure to controversial weapons;
2. an indicator signaling a violation of the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
3. the so-called Overall Flag indicator, which indicates whether a Company’s activities and/or products are associated with significant controversies that have serious social or environmental impact, according to the assessment of the external data provider;
4. an indicator of exposure to the cannabis industry;
5. an indicator of exposure to the tobacco industry;
6. an indicator of exposure to the gambling industry.

If the principal adverse impact indicators do not decrease over more than one reporting period (and especially if they are otherwise considered high compared to the average for the given industry) or even increase significantly, the Bank will conduct further analysis based on the public disclosures of the Company or companies concerned and, if appropriate, will seek to contact the Company or companies directly in order to improve the indicator, or may consider adjusting the engagement policy, including modifying limits or setting new ones.

The Engagement Policy is available at: https://www.otpgroup.info/static/sw/file/Shareholder_engagement_policy.pdf

Reference to international standards

OTP Bank Plc. is currently not a signatory to codes of responsible business conduct and internationally recognised due diligence and reporting standards. The Bank, as a financial market participant, has not used indicators that measure compliance or alignment with international standards to examine the main adverse impacts on sustainability factors.

Historical comparison

The impact columns in the section of the table above entitled “Description of the principal adverse impacts on sustainability factors” include a comparison over time between the current reporting period (2025) and the previous reporting periods (2024, 2023 and 2022). The difference between periods may be explained by the reallocation of investments, changes in data quality and data coverage, in addition to the fact that the adverse impacts of individual companies themselves may change.

ⁱ NACE is the European Union's code system for the statistical classification of economic activities.

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