

OTP BANK PLC.'S SYSTEM OF REPORTING UNETHICAL CONDUCT

OTP Bank Plc. (hereinafter: the Bank) has established a system for **reporting suspected or actual violation of the values specified in its Code of Ethics** and for the handling of such reports (hereinafter: System of reporting unethical conduct).

The Bank's Code of Ethics is available at all OTP Bank branches as well as on the Bank's website (https://www.otpbank.hu/static/portal/sw/file/OTP_EtikaiKodex_EN.pdf).

The purpose of this information note (hereinafter: Information Note) is to present the rules concerning the operation of the System of reporting unethical conduct and the reporting procedure.

Please note that if you *wish to file a complaint*, i.e. to express your dissatisfaction with any of the Bank's products or services, or object to the Bank's activities or omissions before, during or after concluding a contract, including performance, termination or settlement of disputes related to the contract, you should study the Bank's Complaints Policy (<https://www.otpbank.hu/portal/hu/Contact/Panaszkezeles>).

The identity of notifiers, the notifications, requests and investigations will always be treated confidentially by the Bank, in observance of the applicable statutory regulations and internal regulatory documents, while protecting the notifying person. The system of reporting unethical conduct is designed so that the identity of the notifier, if not anonymous, cannot be made known to anyone other than the investigators of the report. Investigators of the report shall keep the information on the content of the report and the persons involved in the report confidential until the conclusion of the investigation or the initiation of formal liability proceedings as a result of the investigation and may not share it with other organizational units or employees of the Bank, except for informing the person having made the report.

The notifier enjoys protection against discrimination and unfair treatment, and it is strictly forbidden to impose any disadvantage or discrimination on the notifier for reason of having submitted the report. However, unfounded reports filed by ill-intentioned notifiers are unsolicited and such reports (slander) may entail legal consequences.

The purpose of operating the Whistleblowing Channel is to allow the notifier to draw attention to real events that have actually violated the Code of Ethics. Therefore, the notifier shall declare that the whistleblowing report was made in good faith about circumstances they are either aware of or have reason to believe to be true.

Ethical problems may also be reported in anonymity. Notifiers (anonymous or not)—if possible— shall be advised that the investigation may be closed without a conclusion if the information they provided is insufficient/unsuitable for the investigation of the reported case, or the information absolutely essential to initiate or successfully conduct the investigation otherwise cannot be obtained for any reason. The notifier shall be requested to provide a contact detail – while maintaining anonymity – so that we could request additional information if needed and give notification of the result of the investigation.

1. Methods of whistleblowing

The report may exclusively be made through the following channels:

orally,

- (i) in person during working hours (at a date agreed in advance) to the Compliance Directorate;
- (ii) through the telephone customer service, Monday through Friday from 8:00 to 20:00 via the Bank's Ethics Hotline (+36 1 366 6768);

in writing,

- (iii) by mail, addressed to the Compliance Directorate (1131 Budapest, Babér utca 9.)
- (iv) by e-mail to etika@otpbank.hu.

The audio material of the reports made to the telephone customer service is recorded by the Bank.

2. Recording a report

The Bank records and handles reports in a closed system.

If the report does not relate in whole or in part to an alleged or actual violation of the values specified in the Code of Ethics (the objected activity, event or condition does not violate the Code of Ethics), the report (or the relevant part thereof) will be forwarded to the Bank's competent organizational unit to initiate the appropriate proceedings. Thereafter, the Bank shall notify the notifier at the contact details provided by the notifier of the transfer and shall close the report (or the relevant part) without investigation.

3. Examination of the report

The Bank shall make all efforts to handle reports efficiently and quickly by ensuring that these are investigated within 30 (thirty) days after receipt, which time limit shall only be subject to deviation in highly justified cases, provided that the notifier is simultaneously informed, except where the whistleblowing report was made anonymously. The investigation shall not last longer than 3 (three) months.

The report will be investigated by the Bank, except in the following cases. The investigation is carried out by the Bank's Compliance Directorate and, or if it is involved in the case, by the Head of the Banking Group Governance and Operations Division and/or a person appointed by him/her. Other organizational units of the Bank may be involved in the investigation if it is justified and necessary for conducting the investigation.

Examination of the reporting may be waived if:

- the detriment to public interest or overriding private interest is not in proportion to the limitation of the rights – due to the investigation - of the person concerned ensuing from the investigation of the report.
- the report is a repeated one by the same notifier with the same content as the previous reporting
- the notifier lodged the report more than 6 (six) months after having become aware of the act or negligence being the subject of the report.

If the report does not contain sufficient information for investigating the merits of the report, the Bank may contact the notifier in writing in order to collect the missing information.

Upon the commencement of the investigation, the person affected by the report shall be informed about the specific report, and pursuant to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and based on the repealed Directive 95/46/EC (General Data Protection Regulation, GDPR), on their rights pertaining to the protection of their personal data, and on the rules governing the processing of their data. In exceptional and justified cases, the person concerned may also be informed later than the commencement of the investigation, if prompt information is likely to impede, seriously compromise or prevent the investigation of the report, or can be waived based on the above. In such cases the Bank shall take appropriate measures - including making the information publicly available - to protect the data subject's rights, freedom and legitimate interests.

In compliance with the requirement of fair proceedings, the Bank shall give the person concerned an opportunity to state his/her position on the report and to provide supporting evidence even through a legal representative.

The Bank closes the investigation with a decision: it establishes whether an ethics offence and/or infringement has taken place or not; in the absence of evidence no ethical offence and/or infringement can be established.

Due to the conduct included in the notification, the Bank will take the necessary measures on the basis of the investigation, for example, complying with the rules of employment, it may apply employer's measures or initiate criminal proceedings.

The Bank shall also inform the notifier and the person affected by the report of the result of the investigation, as well as the notifier of the measures taken.

If the notifier or the person affected by the report does not agree with the outcome of the investigation carried out in connection with the report, they may appeal to the Bank's Ethics Committee, which then shall examine the issue at second instance and decide whether or not an ethics offence has taken place or in the absence of evidence no ethical offence and/or infringement can be established.

4. Data processing, protection of personal data¹

The rules on data processing in connection with the report and information on the rights of the person involved in data processing pursuant to the General Data Protection Regulation are contained in the Privacy Notice on Data Processing.

¹ personal data: any information relating to the identified or identifiable natural person ('data subject').