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File number: 749-47/2024.

Contact:
Subject: Application of a supervisory measure and imposition of fine

Resolution number: H-JÉ-I-B-256/2024.

Based on the conclusion of a supervision procedure at **OTP Bank Plc.** (registered office: 1051 Budapest, Nádor utca 16.) ("the Issuer") performed by the **National Bank of Hungary** (registered office: 1013 Budapest, Krisztina krt.55., establishment: 1122 Budapest, Krisztina krt.6.) ("MNB"), the MNB passes the following

Resolution

- I. The MNB obliges the Bank, in order to ensure full legal compliance of its financial service activities, by December 31, 2024 at the latest – with the exception of point I.1.3., to which it must comply with immediately after the notification of the resolution - and after that it must continuously comply with the following:
 - 1.1 review and align its entire internal regulation regarding the Corporate Standard Credit (VSH) process with the applied practice, and within this framework, in the case of exceptional branch decisions, confirm and strengthen the prohibition of approval outside the submission and decision process, or of decision-making determined at an inappropriate level or in an inappropriate manner;
 - 1.2 in the VSH process, restructure its decision-making rules in such a way that the risk management area is included in the decision-making in the cases included in this point of the justification of the decision;
 - 1.3 in the VSH process, in the case of exceptional branch approval, in the submissions and licensing decisions in accordance with its internal regulations, always include the justification for exceptional decision-making
- II. In the context of extraordinary data provision, the MNB requires the Bank to submit its internal auditor's report, discussed by the board of directors and approved by the supervisory board, and the documents supporting the implementation of the measures on the full implementation of the measures related to the obligations contained in the main point I of the operative part of the decision, by 28th February 2025 at the latest to MNB.
- III. The MNB obliges the Bank to pay a fine in the total amount of HUF 5,000,000,- (i.e. five million Hungarian forints), due to the legal violations established in the decision.

The MNB draws the Bank's attention to the fact that if it does not comply with the obligations stipulated in the decision, or if it does not comply fully or late, the MNB has the option of applying additional supervisory measures provided for by law or imposing a fine.

No procedural costs were incurred during the MNB's procedure.

The imposed fine has to be paid to the account number 19017004-01678000-30900002 of the MNB within 30 days after the resolution becoming enforceable by indicating "supervisory fine" as a comment and the number of the resolution. In the absence of the voluntary payment of the fine, the rules of administrative enforcement are applied. In the event the deadline for the payment of the supervisory fine is missed, default interest will be charged, the extent of which will be calculated at the rate of 365th of the double of the central bank rate in effect on the date of imposition after every calendar day following the date of imposition. The default interest has to be paid to the cited account of the MNB by indicating the number of the resolution and the comment "default interest". The legally imposed and unpaid fine, as well as default interest charged due to the unpaid or delayed fine, will be collected by the state tax authority in the same way as taxes.

No appeal can be made against the resolution, however the person whose right or legitimate interest is directly affected by the public administration activity, may, within 30 (thirty) days from the notification, file an administrative lawsuit against the decision with a letter of claim against the decision before the Budapest Capital Regional Court.

The application shall be submitted to the MNB addressed to the Budapest-Capital Regional Court. (The assistance service of form's submission: <https://www.mnb.hu/felugyelet/engedelyezes-es-intezmenyfelugyeles/hatarozatok-es-vegzesek-keresese>). Legal representation is mandatory.

The submission of the application has no suspensory effect on the entry into force of the decision, however, the person whose right or legitimate interest is violated by the administrative activity or the maintenance of the situation caused by it, can request immediate legal protection in order to eliminate the directly threatening disadvantage, to temporarily settle the disputed legal relationship, or to maintain the situation that gave rise to the legal dispute unchanged.

The court will, as a general rule, decide the trial out of court. A hearing shall be held, if so requested in the application by the client. Failure to request a hearing cannot be justified.

Dated: Budapest, 13th September, 2024.

ELECTRONICALLY SIGNED DOCUMENT

May contain secrets protected by the law