

OTP GROUP HUMAN RIGHTS STATEMENT



I. OTP Group

OTP Group provides universal financial services to private individuals and corporate clients in Hungary and currently in ten other countries. Specialized services such as car leasing and investment funds are developed and offered by OTP Bank Plc.'s (Bank) subsidiaries. In the following, the Bank, and its subsidiaries both in Hungary and abroad will be collectively referred to as OTP Group or the Group.

II. Foundational Principles and Commitments

OTP Group respects and upholds human rights and acts at all times in accordance with the Universal Declaration on Human Rights. As a financial institution and employer, OTP Group's policies and practices regarding human rights are further informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

OTP Group is committed to upholding human rights in all areas it operates in and with regards to all clients and businesses it deals with. OTP Group considers it essential that its business activities never infringe on human rights and that any such concerns involving the Group are addressed promptly. Human rights due diligence is to be implemented to identify, prevent, and mitigate such risks. We strive to ensure that deals are compliant and limit any negative impact our business or our clients' businesses may have on the environment and on society by ESG risk assessment procedures – these factors play an increasingly important role in our decisions on whether to engage with clients and potential clients, as well as when deciding what to finance.

OTP Group complies with the respective laws and regulations of the countries where the Group engages in business activities. If there is any conflict with the internationally recognized standards, the Group will strive for the highest possible compliance with internationally recognized standards whilst abiding by the laws and regulations in force wherever the Group engages in business.

III. Impact as a financial institution

As one of the largest banking groups in Central and Eastern Europe and a significant employer, the Group's conduct and business decisions can have important implications regarding the development and promotion of human rights standards in the region. Following from this, OTP Group acknowledges its responsibility to prevent and mitigate any adverse human rights impacts related to their operations, services, and business partners.

OTP Group expects its clients and business partners to share its commitments to uphold internationally recognized human rights standards. If any human rights violations by a client or business partner are identified and confirmed, the Group will engage in dialogue to remedy such adverse impacts. If, upon request, the client or business partner has no intent to remedy the adverse impacts, or such remedy is infeasible, the Group may choose not to engage with or terminate transactions with the client. Child labour and all forms of forced labour such as bonded labour, slave labour, and forced labour through human trafficking are firmly renounced by OTP Group. **In case of substantiated claims against any of the Group's clients, business partners or suppliers regarding forced labour or child labour, OTP Group will not provide financial services or engage in any transactions with that entity¹.**

It is OTP Group's priority as a financial institution to provide fair and responsible financial products to its customers without undue restrictions. All subsidiaries of the Bank work to integrate into our operations

¹ As per its ESG exclusion list.

not only the foundational human rights principles, but third generation rights such as the right to a healthy environment and to sustainable development. **We do not tolerate any form of modern slavery and welcome the increased global efforts to tackle the issue.**

In conducting processes, ethical and sustainability considerations are gaining larger traction in decisions on whether to engage with potential clients and what to finance. The Group is committed to complying with and exceeding (where achievable) the requirements of environmental, consumer protection and other regulatory standards and to reducing any negative impact the Group's business may have on the environment.

IV. Internal Governance

As an employer, OTP Group is committed to protecting the dignity and rights of each individual at all levels of the organisation. The Bank and its subsidiaries seek to provide an environment where employees are able to maintain their physical, mental, and social health and where everyone can thrive and reach their maximum potential. To achieve the latter objective, we promote the personal and professional growth of our employees by providing excellent primary and secondary benefits and development opportunities.

OTP Group particularly supports freedom of association and the right to collective bargaining, **recognizing their importance to social and economic development**. Where employees are represented by a legally recognized union, OTP Group is committed to bargaining in good faith with the employees' freely chosen representative. All operations of the Group respect and uphold the rights of employees to communicate openly with management regarding working conditions and strive to enable that to happen without fear of retaliation, harassment, intimidation, penalty, or interference.

As a responsible employer, OTP Group seeks to facilitate a culture where open and candid communication is encouraged, and diversity is respected. An integral part of our corporate culture is the principle of equal pay for equal work. Salary decisions are based on the nature, responsibility, and scope of the work carried out by each employee, whilst considering the employee's individual knowledge, skills, and experience. Having a performance-based incentive system in place, the Group ensures that employees are duly and adequately compensated for their work. OTP Group strives to be a desirable workplace with equal opportunities for all. Any discrimination on account of characteristics including but not limited to race, sex, nationality, religious or ideological conviction, sexual identity, ethnic origin, disability, sexual orientation, political or other views, marital status is prohibited. This standard is backed by our Code of Ethics and whistleblower guidelines that allow employees to air any concerns safely and confidentially, should they arise. Retaliation is prohibited against those who seek to raise issues in good faith.

V. Relevant OTP Bank Plc. and OTP Group² policies and documents include but not limited to:

- [Code of Ethics](#)
- [Strategy to Create Gender Equality](#)
- [Details of The ESG Programme](#)
- [OTP Bank Consumer Protection Compliance Program](#)
- [OTP Bank Plc's system of reporting unethical conduct](#)

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² The subsidiary banks' policies may vary and can be found on their respective websites.