OTP Bank Albania

Code of Ethics

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Message from the Chairman and CEO of OTP Nyrt. Group

Dear Reader,

OTP Group is a major player in Hungary and the Central and Eastern European region. We are a stable and reliable partner for our clients: we and our staff strive to support them in achieving their goals and development with modern, innovative and customisable banking solutions. We now operate in 12 countries and serve more than 16 million customers. OTP is the first European bank to become known in Central Asia and Uzbekistan, after Central and Eastern Europe. In each of the countries concerned, the OTP Group shares common values and acts responsibly, following the same guidelines, in the interests of customers, investors, employees, local communities and the environment.

In addition to continuously increasing shareholder value, profitability and efficiency, the Group's operations are focused on ensuring compliance with the law, reducing risks and effectively enforcing business, ethical and internal controls. The Group is characterised by a long-term approach and a responsible attitude, striving for sustainability. At the same time, OTP Bank is also mindful of its legal obligations to ensure that the OTP Bank and the OTP Group operate profitably in the interests of their depositors, shareholders and investors. These two aspects must be balanced and interact with each other.

As a law-abiding and ethical institution, the Group and its entire management are committed to upholding and enforcing the law, including anti-corruption laws. We have zero tolerance for corruption and bribery – we strongly oppose all forms of corruption and support anti-corruption measures.

Our success is inconceivable without skilled, committed, ethical people who can work in a working environment where individual differences are accepted and valued; where equality of opportunity, mutual respect and respect for human dignity are essential in all circumstances.
All OTP Group employees are expected to perform their work in full compliance with ethical and professional standards.

In our operations, we put primary focus on transparency, regulation, the definition of internal responsibilities and thus effective compliance with the broadest environmental, social and regulatory requirements. We are confident that operating ethically contributes significantly to enhancing the performance and competitiveness of the OTP Group and to increasing its recognition.

The basics and principles of ethical business conduct is summarised in the Code of Ethics. Familiarity with and compliance with the document, and monitoring of changes, is a fundamental expectation for all employees and business partners.

Dr. Sándor Csányi
Chairman & CEO

Message from the CEO of OTP Bank Albania

"Banka OTP Albania, part of Hungarian Banking Group, OTP Bank Plc is engaged to act in accordance with all the provisions foreseen in this Code of Ethics. Integrity and responsibility are our key words in our mission as part of this Bank. Our goal to be among the top ranked banks, in size and quality, and to become the bank the market shall refer to, in terms of service, quality of products and innovative solutions relies primarily in the qualified work of our employees and especially their ethical behaviour.

To ensure the implementation of all the requirements of the Code of Ethics we have a dedicated internal committee in charge of dealing with specific case of breach of procedure by bank staff, internal fraud cases or other specific cases on doubtful staff actions including as well issues concerning ethical conduct by way of its statements made in general and individual cases and its decisions facilitating the interpretation of rules. This committee must take a stance in general and specific cases relating to the application of this Code of Ethics and make recommendations for the continued improvement of the Code of Ethics on the basis of its practical work and experiences. Every single member of the committee is fully committed to the Bank's ethical operations."

Bledar Shella

Chief Executive Officer of OTB Bank Albania

"It is the task of the Ethics Committee to provide guidance concerning ethical conduct by way of its position statements relating to general and individual cases and its decisions facilitating the interpretation of rules and particular cases. To take a position on general and specific matters relating to the application of this Code of Ethics and to make proposals for its further development on the basis of its practical work and experience. Every single member of the Ethics Committee is fully committed to the Bank's ethical operations."

Mihály Baumstark
Chairman of OTP Bank's Ethics Committee

I. Introduction

The Code of Ethics of OTP Bank Albania (hereinafter, the "Bank" or "OBA") sets out clear and unambiguous guidelines and expectations for the Bank and those affiliated with the Bank on ethical business conduct in order to protect the values of the Bank.

The Bank adopted its Group Code of Ethics in 2006, which is constantly changing and evolving in line with external and internal changes and expectations. This amendment aims to effectively address the challenges of technological advances induced by artificial intelligence and to keep them within an ethical framework. The Code of Ethics is based on international standards, ethical guidelines, best practices and our own operational experience, which take into account the expectations of the members of the OTP Group and practical feasibility.

To ensure the uniform application of the principles, this Code of Ethics constitutes the basis for OTP Bank Albania, taking into consideration any potential differences arising from national specificities or, in certain cases, from the specific regulatory environment.

Compliance with ethical rules and ethical conduct within the Bank is monitored by the Ethics Committee.

The Bank attaches great importance to the awareness and knowledge of ethical standards and the ethical reporting system among its employees, therefore it conducts ethics training for all employees and regularly reviews and monitors the knowledge of and compliance with ethical standards.

I.1 Compliance with the Code of Ethics is everyone's responsibility

The Code of Ethics imposes obligations on Bank's senior executives and persons employed by or having a legal relationship for the performance of work with the Bank (collectively referred to as "employees" or "our employees").

The standards, principles and expectations set out in the Code are binding for all employees.

While the Code provides guidance on a number of ethical issues, it cannot provide complete guidance on the appropriate course of action in all situations and circumstances. In situations that are not specified in the Code of Ethics, Bank's employees must act in good faith and with good intentions, with a view to protecting the integrity and reputation of the Bank.

If you have any questions regarding the application of the Code of Ethics, it is always advisable to seek the assistance of the Compliance Sector.

I.2 We also expect our partners to comply with the principles of the Code

Our employees and agents who perform contractual obligations for the Bank and who, in the course of these activities, meet a wide range of clients or potential clients of the Bank, perform services on behalf of the Bank for them or, in the course of their contractual obligations, clearly appear in public as representatives of the Bank, accept the Code of Ethics by signing the declaration applicable to them. The Bank strives to ensure that all other agents undertake to comply with the provisions of the Partner Code of Ethics of OTP Bank Albania by accepting the General Terms and Conditions, which form an integral part of the contract concluded with the Bank.

I.3 Reporting breaches of the Code of Ethics

If an employee of the Bank observes any unlawful practice, contrary to the rules and values set out in the Code of Ethics, or any practice that may lead to abuse, they shall bring it to the attention of the persons concerned or the immediate supervisor of such persons.

It is the duty of our employees to report any breach, violation of the values set out in the Code of Ethics or any ethical problem:

To the Compliance Sector

- in person, during working hours (by appointment) or by letter:
  at OTP Bank Albania. Compliance Sector (Bulevardi "Bajram Curri", Godina "Down Town", kati 8,Tirana,Albania)
- by telephone, Mondays-Fridays, 8:00 a.m. – 8:00 p.m., at the Bank's whistleblowing phone numbers that are published on the Bank's website;

- by e-mail at oba.whistleblowing@otpbank.al
- online via the ethics and whistleblowing platform (https://www.otpgroup.info/ethical-breach-and-whistleblowing/form).

Reports can also be made anonymously. Notifications, requests and investigations will always be treated confidentially by the Bank, in observance of the applicable statutory regulations and internal rules, protecting the whistleblower. In the case of anonymous reporting, it should be noted that we may not be able to obtain the additional information necessary to investigate and resolve the problem, and therefore the Bank requests that, while maintaining anonymity, the whistleblower provide contact details so that we can request the necessary information.

The Bank makes every effort to protect employees who report discrimination and unfair treatment: it prohibits the use of retaliatory measures or negative consequences against anyone who in good faith reports a violation of the rules and values of the Code of Ethics.

I.4 Zero tolerance for violations of the Code of Ethics and adverse action against whistleblowers

OBA employees are responsible for learning the contents of the Code of Ethics and doing their utmost to comply with the Code of Ethics. The Bank applies the principle of zero tolerance to any violation of the rules and values set out in the Code of Ethics and to any action that has a negative impact on the reputation of the Bank or is unacceptable from a legal, moral or ethical point of view.

In the event of a breach of the Code of Ethics, the procedure and sanctions shall be in accordance with the rules and principles set out in the internal regulatory documents of the Bank.

The Whistleblower is protected against discrimination and unfair treatment for making a whistleblowing complaint. The Whistleblower had a good reason to believe that the conduct reported violates a legal, moral or ethical standard.

Reporting in bad faith also constitutes a breach of Bank's ethical principles, which may have legal consequences.

II. Standards of conduct for our Employees

II.1 Protecting the reputation of the Bank

Our employees must refrain from any conduct, both inside and outside the workplace, that could adversely affect the reputation of the Bank.

The Bank expects its employees to conduct themselves in a manner consistent with the ethical standards of the Bank in their private life, especially when their activities or their person may be in any way associated with the Bank.

Our employees may not exercise their right to express their opinions in any form, including social media, in a way that seriously damages or jeopardises the reputation and legitimate economic and organisational interests of the Bank.

In the course of their private activities, Bank employees must not give the impression that they are acting on behalf of the Bank. OBA employees shall not use their positions for personal gain or to benefit third parties, nor shall they use the infrastructure, logo, intellectual property of the Bank for the conduct, promotion or advertising of their own business.

Without proper authorisation, our employees must not in any way create the appearance that the Bank is playing any role in the business or private interests of employees or third parties.

II.2 Protection of the Bank's assets

Our employees are responsible for the protection of all such tangible, financial and other assets of the Bank, the customers and the agents, the management of which has been assigned to them as part of their job. The assets and property may only be used for the purposes authorised and in accordance with the relevant authorisations and conditions.

The improper handling or unauthorised use of the assets of the Bank and unauthorised sharing the assets with third parties constitutes a breach of the obligations towards the employer. Carelessness or wastefulness in relation to these may also constitute a breach of obligations towards the Bank.

For the purposes hereof, assets include cash, securities, physical property, business plans, information of and pertaining to customers, employees and agents, intellectual property and any and all other personal and/or confidential information and information under copyright protection.

II.3 Compliance with health, safety and environment standards

All employees must comply with the health and safety regulations pertaining to work, in accordance with the relevant health, safety and fire protection regulations.

Consumption and/or use of alcohol, illegal substances, drugs or other mind-altering substances at the workplaces and at other venues in the course of activities relating to work is strictly prohibited, along with appearing under the influence or performing activities qualifying as abuse (offering, handing over, dealing in etc.) involving alcohol or such substances. The consumption of alcohol in moderation is allowed on formal occasions and at work events.

Bank employees are obliged to pay attention to environmental and energy saving aspects and to the prevention of energy waste during their work and stay in OBA buildings.

II.4 Confidentiality, data protection

The employees of the Bank shall exercise great care in handling bank and securities secrets, personal data and other data that come into their possession and are required to be protected by various confidentiality provisions, and they shall retain this information without time limitation. Confidential information is also any information relating to the operation and activities of a company belonging to the Bank, the formal or informal disclosure of which is not permitted in situations where it is not necessary for the normal course of business or is not related to the employee's duties.

All employees are prohibited from misusing non-public investor information that comes to their knowledge in the course of their work.

Our employees must continue to respect their duty of confidentiality even after they leave office or employment.

During the course of their daily work, OBA employees are obliged to ensure that paper and electronic documents generated during their work are not left in a place and condition accessible to unauthorised persons.

II.5 Mutual respect, cooperation

The Bank expects its employees to continuously strive to maintain a cooperative working atmosphere, to respect the community's rules of politeness, and to resolve conflicts between them through open and polite communication (appropriate tone, language and gestures).
Bank employees communicate with each other in a respectful, empathetic, professional and effective manner, for example by taking care to provide timely feedback on enquiries from colleagues. In internal communication, the Bank promotes dialogue, exchange of views, sharing of initiatives and ideas between employees.

Employees are prohibited from any conduct (whether verbal or physical), including in internal communications, that violates the dignity of any person or creates an intimidating, hostile, humiliating, offensive, degrading or insulting environment, including, in particular, sexual or other forms of harassment.

Our employees are expected to take care of their appearance and wear appropriate attire, especially when dealing with customers and when representing the Bank.

II.6 External communication

Our employees shall also communicate with clients, business partners, external service providers and other stakeholders in a respectful and professional manner, while respecting confidentiality at all times. Appropriate tone of voice, use of words, actions and gestures are fundamental expectations towards Bank employees.

Only authorised employees may make media appearances or public presentations of any kind on behalf of the Bank.

In their daily activities with both competitors and business partners of the Bank, our employees must comply with competition law rules, in particular the rules on cartel arrangements.

II.7 Social media

Our employees must use social media responsibly and carefully, taking into account that third parties may associate posts and activities in their private lives with the Bank, its values and corporate culture. Accordingly, our employees should endeavour to keep their private and business, work-related activities separate.

Our employees must also refrain from any social media posts that could adversely affect the reputation of the Bank. Even when communicating in social media as a private individual, the Bank expects its employees to behave in a manner befitting and conforming to Bank’s ethical standards, especially if their person or their activity may be connected to the OTP Group in any way or may make it appear as though they act or express an opinion on behalf of the Bank.

In social media, our employees must in particular
- respect and accept the religious, national, ethnic, sexual, political and philosophical beliefs of others;
- refrain from publishing racist, hate speech and content;
- respect the constitutional and lawful rights of others;
- also behave respectfully towards the competitors of the Bank;
- not provide false, misleading or intentionally false information;

- refrain from the publication of unlawful materials or materials that encourage others to engage in unlawful activities;
- avoid using vulgar, obscene, defamatory or libellous language.

The Bank name, logos, trademarks (including company headers, websites, social networking sites), contacts may not be used for private purposes or in any way imply that the Bank is involved in the business or private purposes of employees or third parties without proper authorisation. Accordingly, our employees may only identify the Bank as their employer until the end of their employment, their last day of employment.

II.8 Political involvement

The Bank recognises the right of its employees to engage in political and public activities, but they may only engage in political activities outside the workplace. In the course of their political activities outside the workplace, they must not misuse their positions at the Bank and they must refrain from behaving in any way that may have a negative impact on the Bank's reputation.
Employees must inform the employer before assuming any position in any political or state organisation. Employees shall not abuse their role or position in a political or public organisation in the course of their work in the Bank.
The use of Bank resources (staff, facilities, other assets) to support political events is prohibited.

II.9 Managing gifts and invitations, preventing corruption

Giving gifts is often part of local culture and tradition, and therefore the acceptance of gifts of small value, which are customary in business, by OBA employees is acceptable, subject to the rules set out in the Gift and Events Policy. However, Bank employees should not give or accept gifts in circumstances where it may appear to outsiders to influence a business decision or even be construed as bribery.

Examples of gifts that are customary in business include holiday gifts, promotional gifts, souvenirs or other gifts of small value that are customary for the occasion and not of a size or frequency that might be expected to influence business decisions. It does not constitute a business gift and therefore no recurring, regular (daily, weekly, monthly) benefit from the same customer or group of customers is acceptable.

Invitations can also be a legitimate part of business relations and can help to build and maintain good business relationships, so invitations and acceptance of invitations that are customary in business relations are permitted. Such cases may include invitations to lunch or dinner, participation in receptions or other types of entertainment. However, expenses should always be kept within reasonable limits, the reasonable limit depending on the situation, and the acceptability of the invitation will be decided by the Compliance Sector. Professional and conference invitations must also be agreed with the Compliance Sector.

OBA employees shall report gifts and invitations to the Compliance Sector in accordance with the relevant internal regulations. Gifts or events exceeding the small value threshold may only be accepted in exceptional cases, subject to the approval of the Compliance sector. If the gift is not acceptable, it must be returned immediately or, if that is not possible, donated to charity.

In connection with investment services, the provisions of the internal regulatory document of the Bank on the principles and rules of incentive management shall also be taken into account.

Corruption, or undue influence, is the giving or receiving of an undue or unlawful advantage in return for a consideration. Anything of value that involves a financial or other benefit may be used to influence others: cash, gifts, credit, collateral, any offer, discount, entertainment, service, benefit, offer of employment, with no minimum amount or threshold. A facilitation payment is an informal benefit

intended to facilitate and expedite an action to which the payer would otherwise be entitled. The Bank refuses the practice of facilitation payments and will not make such payment when such is requested.

The employees of the Bank are required to pay particular attention to the detection, prevention and reporting of possible bribery attempts related to the activities of the Bank. No employee shall offer, promise, make, perform or give anything of value, or solicit or accept anything of value, with the purpose and intent to influence a public official or other person or to obtain an unfair business advantage.

Even the suspicion and appearance of corruption and undue influence should also be avoided, especially in relation to gifts and invitations given in contacts with government, public authorities and international and non-governmental organisations. The Bank has zero tolerance for corruption.

II.10 Conflict of interest

All employees of the Bank must carefully manage interests and personal relationships that may affect the economic interests and reputation of the Bank or the impartial decision-making of employees in the interests of the Bank. Employees must make every effort to avoid potential conflicts of interest or the appearance thereof.

Employees of the Bank must not engage in any conduct or hold any position that would harm or jeopardise the legitimate economic or operational interests of the employer, in particular, for example, economic interests, additional employment or office, family relationships or political interests.

Employees are required to cooperate with the Bank to manage conflicts of interest quickly and effectively in accordance with the relevant internal rules and to keep their conflict of interest declarations up to date.

When designing and selling the products and services of the Bank, our employees must act in an ethical manner, i.e. they must refrain from any activity that is contrary to the interests of the Bank and its customers, and they must make their decisions impartially and without bias.

Within the Bank, is not permitted the formation and maintenance of financial relationships and dependencies between employees. In exceptionally justified cases, the Compliance Sector may grant a prior exemption from this in accordance with the relevant internal regulations.

In addition, the Bank has a conflict of interest policy to avoid, detect and manage conflicts of interest for its clients in view of their investment services and ancillary services activities. The Conflict of Interest policy specifies the circumstances that lead or may lead to such conflicts of interests in the case of the given investment or ancillary services that may have negative consequences for the customer, and it lays out the detailed procedural rules and actions to be applied in the management of the given conflict of interests.

II.11 Additional obligations of the OTP Group's managers

II.11.1 Ensuring compliance with the Code of Ethics

The Bank's management will make every effort to ensure that employees are made aware of the rules of the Code of Ethics, support employees in raising ethical issues and concerns in good faith and are not subject to any retaliation for doing so. The Bank's managers will use the legal means at their disposal to monitor the compliance of their employees with the requirements of the Code of Ethics,

and will consistently and impartially apply appropriate and proportionate sanctions to employees who violate ethical standards.

II.11.2 Leading by example

The managers of the Bank lead by personal example in fully complying with the principles of the Code of Ethics, and it is their responsibility to maintain a culture of ethical operation and to enforce the principles and provisions of the Code. Managers shall explicitly take into account the principles of the Bank's Code of Ethics in all decisions and conduct. It is particularly important that managers set an example in terms of appropriate tone, language, actions and gestures in communication.

II.11.3 Providing support, maintaining an ethical working environment

The managers of the Bank support the employees in the performance of their duties, i.e. they provide them with the information necessary for effective work, set clear and achievable goals for them, evaluate the employees' performance with full respect for the requirement of equal treatment, and pay attention to ensuring a safe, harassment-free and harmonious workplace.

III. Bank's business ethics commitments

III.1 Responsible corporate governance

The management of the Bank is committed to fully comply with all applicable laws and industry standards and the principles of ethical business conduct in all its activities related to the services it provides, and to ensure that all employees and stakeholders are bound by them.

In line with its corporate governance practices, the Bank sets out in its internal policies rules, expectations and procedures relating to compliance with legislation, business ethics, transparency, control mechanisms and social responsibility.

III.2 Compliance with legislation

The Bank is committed to operating within the legal framework. In its activities, it complies with the legal requirements, decisions and guidelines of the authorities, as well as industry and organisational standards and ethical requirements applicable to its business activities. The standards of the Bank's Code of Ethics go beyond legal compliance and are in line with best practices and community expectations.

III.3 Transparency of accounts and reports

The Bank strives for transparency and accountability in all its reports and accounts. Falsification of reports and records or misrepresentation or concealment of facts is not acceptable in the Bank. The integrity of financial and non-financial records and reports is essential.

The Bank always prepares, presents and discloses the financial reports in accordance with generally accepted accounting principles and applicable laws. The reports must include the financial position and results of operations of the Bank in all material respects, thereby ensuring that investors are correctly informed.

III.4 Sustainable development and community responsibility

The Bank is committed to environmental sustainability and the protection of environmental, social and corporate governance values. With sustainability principles in mind, the Bank strives to take into account the long-term social and environmental consequences of its activities.

The Bank recognises that mitigating the effects of climate change and the transition to a lower carbon economy is one of the major challenges of the 21st century and that as a financial institution it has a significant role in reducing the environmental and social impacts of its own operations and those of its customers.
Accordingly, the Bank takes into account the environmental and social impacts of its activities, both in its corporate operations and in its financial activities, and develops and applies high climate, environmental and social standards (processes, tools and solutions) for a more sustainable future.

The employees of the Bank, in accordance with the rules of environmental ethics, refrain from any activity that increases climate and environmental risks or adversely affects their consequences. The Bank strives to ensure that its employees receive training and education on sustainability, so that they act in accordance with ESG (environmental, social and governance) values in their daily work.

III.5 Competition law compliance

The Bank is committed to and interested in ensuring the operation of free and fair market conditions facilitating competition. The Bank acts ethically and fairly towards their competitors, in compliance with competition law, and refrains from any conduct that could result in an unfair restriction of competition or abuse of a dominant position.

The Bank refrains from any unfair practices that would unlawfully harm the reputation or goodwill of its competitors, collects information about its competitors in a lawful manner and acts prudently in its dealings with competitors. The Bank pays particular attention not to be party to any cartel arrangement, not to coordinate its market behaviour with its competitors, either directly or indirectly, in particular with regard to price fixing and market sharing. The Bank also refrains from discussing topics in meetings of professional associations which are considered to be relevant for the restriction of competition (e.g. prices, pricing policy, costs, marketing strategies).

III.6 Consumer protection, complaint handling

As responsible service providers, the Bank pays special attention to the protection of consumer interests and rights, and the quality of services provided to consumers. The Bank ensures that its employees directly or indirectly in contact with consumers, receive proper consumer protection training and thus understand and apply consumer protection rules appropriately and act with due care and diligence.

In order to help consumers make informed financial decisions, OBA pays attention to the enforcement of consumer protection principles, transparent information practices, financial education and the protection of vulnerable consumer groups.

The Bank constantly monitors compliance with consumer protection and other legal aspects from the planning and launch of services through the course of product development to the management of marketing and client relations. During commercial and consumer communication, the Bank acts in accordance with good faith and fair dealing and does not engage in unfair commercial practices.

The satisfaction of Bank's customers is a top priority, therefore the Bank strives to resolve customer complaints quickly and efficiently in full cooperation with customers, in accordance with the legal requirements.

III.7 Prevention of insider dealing and market manipulation

The Bank is committed to the fair operation of securities markets and the fair trading of publicly traded securities.

In accordance with the relevant legislation, insider dealing and attempted insider dealing, unauthorised disclosure of inside information, and market manipulation and attempted market manipulation are considered market abuse. In the course of their daily work, certain employees of the Bank may come into possession of inside information, which they are prohibited from using in an unlawful manner. The unlawful disclosure of inside information, which arises where a person possesses inside information and discloses that information to any other person, except where the disclosure is made in the normal exercise of an employment, a profession or duties, is prohibited. The Bank condemns all forms of market abuse.
In accordance with its internal regulatory documents, the Bank takes all necessary measures to prevent market abuse.

In its internal regulatory documents, the Bank takes all necessary measures to avoid and prohibit insider trading and market manipulation in accordance with the relevant legal provisions.
To prevent these, it applies strict monitoring procedures to detect and prevent the misuse of inside information and other unfair market influencing practices in a timely manner.

III.8 Confidentiality, protection of personal data

One of the basic conditions of the Bank's relationship of trust with its customers is that it strictly safeguards the business secrets and confidential information concerning them. The Bank protects banking and securities secrets arising from its financial services activities in accordance with the requirements of the law and acts with the utmost care. The Bank treats all data, facts, information and solutions relating to the identity, data, financial situation, business activities, financial management, ownership and business relations, balances and transactions of its customers' accounts as bank secrets.

The Bank protects and safeguards trade secrets, banking secrecy and securities secrecy in accordance with the provisions of its internal regulatory documents.

The OTP Group processes customer data confidentially and with the utmost care, in full compliance with EU and national law. In order to ensure the proper processing of personal data, the Bank continuously improves its IT systems and provides training to its employees who may have access to the information.

In order to ensure confidentiality: the Bank protects and processes its customers' bank identities, securities identities, personal data and other information that is required to be protected by the various confidentiality provisions in accordance with the law and ensures that access to this information is restricted to employees who have a legitimate need to know in order to carry out their duties.

III.9 Activities against money laundering and terrorist financing

The Bank is committed to complying with the rules prohibiting money laundering. Money laundering is the process of concealing or legalising illegally obtained assets by using those assets or funds in the

course of legitimate business activities in such a way as to conceal their criminal origin or nature. It also includes the use of legally obtained funds to support crime or terrorism.

Financial service providers play an intermediary or host role in the execution of swift and secure money market transactions for individuals and organisations, and therefore there is a high risk that some individuals, through the Bank, may attempt to conceal or disguise the origin of the criminal proceeds through financial transactions. The prevention of such acts and the knowledge of customers is of utmost importance not only for the Bank but also for the image of the money and capital market.

The Bank ensures that its employees with direct customer contact and other areas of its business affected by the above-mentioned risks take the strongest possible action to prevent and deter money laundering and terrorist financing. In their procedures, they apply the "Know Your Customer" principle in order to obtain exhaustive information on customers in accordance with the requirements of the relevant international and national regulators.

III.10 Compliance with international sanctions and restrictive measures

The Bank is committed to complying with applicable international economic, financial, trade sanctions and embargo laws and regulations.

OTP Bank and its relevant subsidiaries have a unified Sanctions and Embargoes Policy and sanctions procedure, which sets out the minimum requirements applicable to the Bank in order to comply with its obligations as set out in the introduction.

III.11 Fraud prevention

The Bank is committed to fighting fraud and does not tolerate fraudulent practices, and pays particular attention to the prevention of budget fraud. Fraud includes any intentional and malicious deception, including the intentional misrepresentation or concealment of facts or circumstances, with the purpose of inducing others to act in order to obtain an advantage and thereby cause damage. Fraud may also occur without personal deception, where persons or parties collude to obtain unlawful advantage by circumventing due process by creating a false appearance of a business or transaction.

III.12 Zero tolerance for corruption

The Bank is committed to combatting corruption, and declared zero tolerance towards all forms of bribery and the gaining of unfair advantages. The Bank ensures that national, European Union and international legislation on the prevention of corruption is fully enforced and expects its employees and contractual partners to comply with it.

The Bank’s Anti Bribery and Corruption Policy sets out the principles of the Group's anti-corruption activities, identifies areas particularly exposed to the risk of corruption and serves as a basic document for the development of the necessary internal regulatory documents and the anti-corruption activities of the relevant employees.

III.13 Ensuring a safe and healthy working environment

For our employees, the Bank provides a healthy and modern workplace in compliance with labour regulations, ensures the protection of their health and safety and provides the necessary safety, occupational safety and fire protection training.
The Bank always complies with the domestic and international statutory regulations, as in force from time to time, pertaining to the creation and maintenance of safe and healthy working environment.

III.14 Respect for human rights

The Bank respects and promotes universal human rights as enshrined in international conventions and does not tolerate any unjustified, unlawful discrimination that violates human dignity, other than discrimination based on performance in employment. It recognises its responsibility to respect human rights and shall act with a view to achieving sustainable development goals.

Human rights include, among others: the right to life, human dignity, personal liberty and security; the right to the highest attainable standard of health; the right to just and favourable conditions of work, to a decent wage and to decent living conditions; the right to freedom of association and collective bargaining, the right to form and to join trade unions, the right to freedom from all forms of trafficking in persons, child labour and forced or compulsory labour; freedom from discrimination, the principle of equal pay for equal work and the right to freedom of expression.

The intention to comply fully with these human rights guidelines determines the commitments and the principles and rules that Bank's employees, agents and customers are expected to respect. The integration of human rights into business relationships is governed by the relevant international standards to which the Bank is committed.

III.15 Equal treatment, equal opportunities, non-discrimination

The Bank strives to create a working environment where differentiation between individual performance is accepted and valued. The Bank considers unacceptable any discrimination based on citizenship, nationality, marital status, age, sex, race, colour, gender identity, sexual orientation, political opinion, political party affiliation, religious or cultural affiliation, origin, disability or any other personal characteristic protected by law.

The Bank's internal rules and policies are based on equal opportunities, which include, among others, remuneration, recruitment, career development opportunities, access to training and the possibility to apply for internal job opportunities. The Bank strives to improve the representation of underrepresented genders and groups in positions of managerial responsibility and on management boards.

III.16 Fair employment practices

The Bank is committed to lawful and fair employment and respect for the principles of labour law. The Bank prohibits the use of all forms of slavery and forced labour, and the employment of children and minors in violation of international employment guidelines. The Bank ensures compliance with minimum wage and working time regulations in accordance with the law, the right to join a trade union or other representative body.

The Bank is committed to the development of its employees, to ensuring an appropriate work-life balance, to respecting their right to privacy and to the confidentiality of their personal data.

The Bank ensures an appropriate working environment, free from harassment, intimidation, discrimination, inappropriate language and offensive language, both in the relations between employees and between supervisors and subordinates; management regulations and actions that violate the human dignity of employees are not permitted.

III.17 Ethical use of the Artificial Intelligence (AI)

The above principles and expectations of the Code of Ethics should also be applied in the development and implementation of AI systems.

The Bank strives to ensure that the principles of transparency, explainability, accountability, fairness, equity and non-discrimination are applied throughout the lifecycle of the AI systems it uses.

The Bank is committed to using prudent, non-discriminatory, stable, fundamental rights impact assessed and compliant AI systems that also comply with EU, national and supervisory legal requirements. By fundamental rights impact assessment, it is understood that any AI-driven automated system must meet the following conditions throughout its lifecycle (during its design and operation):

Bank uses AI solutions that are technically and socially stable and secure, comply with the effective legislation, supervisory regulatory tools, ethical guidelines and internal banking standards, and that makes transparent and explainable decisions.
When using an AI system, the Bank will clearly inform clients that they are communicating with an AI-based system or has used such a system to make a decision.
While ensuring the protection of trade secrets, the Bank provides clients with the opportunity to understand why and on what basis the software has made a decision.
When applying the AI systems used, the Bank ensures that the collection and use of data is in compliance with Law No. 124/2024 On the Protection of Personal Data that aligns with the EU General Data Protection Regulation (GDPR).
Given that decisions made by artificial intelligence may affect the rights or obligations of individuals, the datasets applied by the Bank in the use of AI systems are carefully screened and cleansed of historical biases and distortions to the greatest extent possible. Furthermore, continuous monitoring activities are needed to ensure that any negative feedback loops leading to discriminatory decision making are filtered out and prevented throughout the lifecycle of the AI systems.
The Bank monitors that the development of AI systems incorporates controls to ensure that AI-based decision making is free from biases or discrimination (e.g. in a racial, gender, or economic sense).
In addition, the application of AI systems should never result in the (end-)users being misled or their freedom of choice being infringed. Those using AI must respect the principle of proportionality of means and aims and carefully consider how to balance competing interests and objectives. To this end, in the case of AI systems used by the Bank, the operators of the applications examine, test and strive to monitor the system in advance to ensure that it meets the expected ethical standards and fulfils the requirements for responsible AI application.
The Bank shall ensure control mechanisms that are proportionate to the operational risk of the AI systems used, and review and modification by human users of the AI systems' operation throughout their lifecycle, to the extent necessary for their risk classification.
The Bank is committed to using sustainable and environmentally friendly AI systems.
In order to ensure the ethical, efficient and supervisory compliant use of AI, the Bank provides regular training to employees on the use of AI systems and the applicable ethical guidelines.