

**OTP BANK PLC.**

**INTEGRATED ANNUAL REPORT 2025**

**BUDAPEST, 17 APRIL 2026**

**Dear Shareholders,**

OTP Bank Plc. hereby provides you with the Integrated Annual Report of OTP Bank Plc. for the year 2025, which is based on the audited financial statements approved by the Annual General Meeting of the Company on 17 April 2026.

On behalf of OTP Bank Plc. we declare that, to the best of our knowledge, the separate and consolidated financial statements which have been prepared in accordance with the applicable accounting standards, present a true and fair view of the assets, liabilities, financial position and profit and loss of OTP Bank Plc. and its consolidated subsidiaries and associates, and give a fair view of the position, development and performance of OTP Bank Plc. and its consolidated subsidiaries and associates, describing the principal risks and uncertainties, and do not conceal facts or information which are relevant to the evaluation of OTP Bank Plc.'s as the Issuer's position. Moreover, on behalf of OTP Bank Plc. we also declare that the Sustainability Report, as part of the consolidated Management Report, was prepared in accordance with sustainability reporting standards of the Accounting Act (Act C of 2000 on Accounting), the European Sustainability Reporting Standards (ESRS), and with the provisions of Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council (EU Taxonomy Regulation).

17 April 2026, Budapest



**Dr. Sándor Csányi**  
Chairman of the Board of Directors



**Péter Csányi**  
Chief Executive Officer

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## **MANAGEMENT REPORT 2025 (SEPARATE)**

In accordance with the recommendation stated in the current circular of the MNB on the application of MoF Decree no. 24/2008 on the detailed rules regarding the disclosure requirements applicable to publicly offered securities, OTP Bank Plc. as issuer prepares and publishes this Management Report combined with the Business Report required in the Accounting Act in a single document, stating in dedicated chapters the subjects required in the MoF Decree.

## SEPARATE STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2025

(in HUF million)	Note	31 December 2025	31 December 2024
Cash, amounts due from banks and balances with the National Bank of Hungary	5.	1,359,760	2,075,179
Placements with other banks	6.	3,161,544	2,948,536
Repo receivables	7.	322,368	238,079
Financial assets at fair value through profit or loss	8.	350,781	651,236
Financial assets at fair value through other comprehensive income	9.	1,265,443	592,602
Securities at amortised cost	10.	3,368,087	3,334,145
Loans at amortised cost	11.	5,135,324	4,670,795
Loans mandatorily measured at fair value through profit or loss	11.	1,082,688	998,410
Investments in subsidiaries	12.	2,170,130	2,169,031
Property and equipment	13.	120,331	111,772
Intangible assets	13.	190,825	137,860
Right of use assets	35.	58,916	58,956
Investment properties	14.	4,332	4,227
Deferred tax assets	34.	568	-
Current tax assets	34.	-	-
Derivative financial assets designated as hedge accounting relationships	15.	27,099	43,130
Non-current assets held for sale	46.	-	-
Other assets	16.	<u>383,177</u>	<u>357,095</u>
<b>TOTAL ASSETS</b>		<b><u>19,001,373</u></b>	<b><u>18,391,053</u></b>
Amounts due to banks and deposits from the National Bank of Hungary and other banks	17.	1,656,367	1,606,969
Repo liabilities	18.	377,532	227,632
Deposits from customers	19.	11,391,727	10,891,924
Fair value changes of the hedged items in portfolio hedge of interest rate risk	19.	471	4,303
Leasing liabilities	35.	62,640	64,380
Liabilities from issued securities	20.	1,341,250	1,750,893
Financial liabilities designated at fair value through profit or loss	21.	15,279	17,024
Derivative financial liabilities designated as held for trading	22.	94,022	144,499
Derivative financial liabilities designated as hedge accounting relationships	23.	6,682	19,438
Deferred tax liabilities	34.	-	1,707
Current tax liabilities	34.	18,589	23,591
Provisions	24.	50,347	25,647
Other liabilities	24.	483,161	449,522
Subordinated bonds and loans	25.	<u>493,587</u>	<u>362,271</u>
<b>TOTAL LIABILITIES</b>		<b><u>15,991,654</u></b>	<b><u>15,589,800</u></b>
Share capital	26.	28,000	28,000
Retained earnings and reserves	27.	3,309,633	2,896,319
Treasury shares	28.	<u>(327,914)</u>	<u>(123,066)</u>
<b>TOTAL SHAREHOLDERS' EQUITY</b>		<b><u>3,009,719</u></b>	<b><u>2,801,253</u></b>
<b>TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY</b>		<b><u>19,001,373</u></b>	<b><u>18,391,053</u></b>

**SEPARATE STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED 31  
DECEMBER 2025**

(in HUF million)	Note	Year ended 31 December 2025	Year ended 31 December 2024
<i>Interest Income:</i>			
Interest income calculated using the effective interest method	29.	952,686	1,040,534
Income similar to interest income	29.	590,190	585,619
<b>Interest income and similar to interest income total</b>		<b>1,542,876</b>	<b>1,626,153</b>
<i>Interest Expense:</i>			
<b>Interest expenses total</b>	29.	<b>(944,802)</b>	<b>(1,107,551)</b>
<b>NET INTEREST INCOME</b>		<b><u>598,074</u></b>	<b><u>518,602</u></b>
Loss allowance on loan, placement and repo receivables losses	6., 7., 11., 30.	(10,222)	(19,955)
Release of loss allowance / (Loss allowance) on securities at fair value through other comprehensive income and on securities at amortised cost	9., 10., 30.	4,101	(35,128)
Provision for loan commitments and financial guarantees given	24., 30.	(744)	(2,565)
Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss	45.4.	1,016	4,193
<b>Risk cost total</b>		<b>(5,849)</b>	<b>(53,455)</b>
<b>NET INTEREST INCOME AFTER RISK COST</b>		<b><u>592,225</u></b>	<b><u>465,147</u></b>
<b>LOSSES ARISING FROM DERECOGNITION OF FINANCIAL ASSETS MEASURED AT AMORTISED COST</b>		<b><u>(5,223)</u></b>	<b><u>(9,856)</u></b>
<b>MODIFICATION LOSS</b>	4.	<b><u>(1,470)</u></b>	<b><u>(1,999)</u></b>
Income from fees and commissions	31.	569,658	468,566
Expenses from fees and commissions	31.	(119,110)	(92,217)
<b>NET PROFIT FROM FEES AND COMMISSIONS</b>		<b><u>450,548</u></b>	<b><u>376,349</u></b>
Foreign exchange gains and (losses)	32.	52	(6,885)
Gains on securities, net	32.	20,964	120,863
(Losses) / Gains on financial instruments at fair value through profit or loss	32.	(8,123)	27,377
Net results on derivative instruments and hedge relationships	32.	30,159	(6,063)
Dividend income	32.	412,324	413,262
Other operating income	33.	35,523	18,380
Other operating expenses	33.	(91,505)	(37,072)
<b>NET OPERATING INCOME</b>		<b><u>399,394</u></b>	<b><u>529,862</u></b>
Personnel expenses	33.	(230,611)	(200,268)
Depreciation and amortization	33.	(76,122)	(63,551)
Other administrative expenses	33.	(397,772)	(284,128)
<b>OTHER ADMINISTRATIVE EXPENSES</b>		<b><u>(704,505)</u></b>	<b><u>(547,947)</u></b>
<b>PROFIT BEFORE INCOME TAX</b>		<b><u>730,969</u></b>	<b><u>811,556</u></b>
Income tax expense	34.	(67,710)	(66,557)
<b>PROFIT AFTER INCOME TAX</b>		<b><u>663,259</u></b>	<b><u>744,999</u></b>
Earnings per share (in HUF)			
Basic	43.	<u>2,464</u>	<u>2,692</u>
Diluted	43.	<u>2,464</u>	<u>2,692</u>

**SEPARATE STATEMENT OF COMPREHENSIVE INCOME FOR THE YEAR ENDED  
31 DECEMBER 2025**

(in HUF million)	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>PROFIT AFTER INCOME TAX</b>		<b><u>663,259</u></b>	<b><u>744,999</u></b>
<b>Items that may be reclassified subsequently to profit or loss:</b>		-	-
Fair value adjustment of debt instruments at fair value through other comprehensive income		(641)	9,751
Deferred tax related to fair value adjustment of debt instruments at fair value through other comprehensive income	34.	75	(848)
Gains / (Losses) on separated currency spread of financial instruments designated as hedging instrument		1,551	(359)
Deferred tax related to (losses) / gains on separated currency spread of financial instruments designated as hedging instrument	34.	(140)	32
(Losses) / Gains on derivative financial instruments designated as cash flow hedge		1,291	136
Deferred tax related to gains on derivative financial instruments designated as cash flow hedge	34.	-	-
<b>Items that will not be reclassified to profit or loss:</b>		-	-
Gains on equity instruments at fair value through other comprehensive income		-	-
Fair value adjustment of equity instruments at fair value through other comprehensive income		(741)	11,547
Deferred tax related to equity instruments at fair value through other comprehensive income	34.	<u>84</u>	<u>(1,305)</u>
<b>Total</b>		<b><u>1,479</u></b>	<b><u>18,954</u></b>
<b>TOTAL COMPREHENSIVE INCOME</b>		<b><u>664,738</u></b>	<b><u>763,953</u></b>

## POST-BALANCE SHEET EVENTS

Post-balance sheet events cover the period until 28 February 2026.

On 28 February 2026, the United States and Israel carried out coordinated military strikes against Iran, in response to which Iran launched retaliatory missile and drone attacks against Israel and U.S. military facilities along the Persian Gulf. As a result, among other effects, global energy prices and foreign exchange rates became more volatile.

### Hungary

- The Monetary Council, in its decision of 13 January 2026, reduced the reserve requirement from 8% to 6%. The new requirement is to be applied by credit institutions starting from the reserve maintenance period commencing in March 2026.
- OTP Bank Plc. issued notes on 3 February 2026 as value date in the aggregate nominal amount of EUR 500 million. The coupon rate is 3.625% per annum, with a maturity structure of 6NC5. The notes are rated 'BBB' by S&P Global Ratings Europe Limited and 'BBB+' by Scope Ratings GmbH. The notes are listed on the Luxembourg Stock Exchange.
- OTP Mortgage Bank Ltd. on 12 February 2026, it has issued mortgage notes in aggregate nominal amount of EUR 500 million. The notes are rated 'A1' by Moody's Investor Service rating agency, the securities are listed on the Luxembourg Stock Exchange.
- According to the preliminary data published by the Central Statistical Office on 30 January 2026, the performance of the Hungarian economy grew by 0.2% q-o-q in the fourth quarter. Annual growth in 2025 reached 0.4%, 0.3% based on seasonally and calendar-adjusted and balanced data. Average annual inflation in 2025 amounted to 4.4%.
- At its interest rate decision meeting on 24 February 2026, the National Bank of Hungary reduced the policy rate by 25 bps to 6.25%.
- As of 24 February 2026, the United States of America abolished the legally contested "reciprocal" tariffs targeting the European Union and replaced them with a uniform, country neutral 10% temporary *ad valorem* import surcharge for a period of 150 days, while sector specific tariffs (e.g. automotive and steel) remained unchanged. The amendment did not materially affect the tariff rates applied to goods imported from Hungary or the European Union into the United States.

## **EQUITY INVESTMENT**

On 22 December 2025, OTP Bank Plc., as a financial investor, made an equity investment of USD 30 million into U Holdings SARL, the holding company of Paraguay's UENO Bank based in Luxembourg, as part of its capital increase.

## **MACROECONOMIC OVERVIEW**

The Trump administration, which took office on 20 January, significantly changed the global economy in 2025, when it began to implement campaign promises, including the introduction of import tariffs. The unfolding tariff war caused huge turbulence in the markets through unpredictability, economic damage and the disruption of trade relations. Year 2025 also brought a major change in the direction of the USA's foreign policy, which, amid increasing geopolitical conflicts around the world, forced its allies, including NATO members, to boost their defence spending, placing a serious burden on their budgets. After the increase in yields owing to Donald Trump's victory in 2024, developed markets' bond yields declined somewhat in 2025, and the dollar has weakened against the euro.

In the first quarter of 2025, the US economy felt the pain of preparing for the tariff war: to avoid tariffs, imports were brought forward, which, through falling net exports, has slowed economic growth to a halt but this was reversed in the second and third quarters. Overall, the US economy survived the first year of the second Trump administration with a better performance than the 1.5-2.0% growth expected at the beginning of 2025. Based on the available data, annual growth exceeded 2%, fuelled by consumer spending and AI investments. The outlook for the labour market was clouded by the strict immigration policy of the US Government, by demographic trends, and by the rapid rise of artificial intelligence, while, despite the US president's plans, the industry failed to create a large number of new jobs. Nevertheless, the situation in the labour market, which deteriorated rapidly in the first half of the year, stabilized by the end of 2025. Despite the inflationary economic policy measures of the new administration, inflation did not accelerate, yet it remained above the Fed's 2% target, which justified caution regarding interest rate cuts, despite deteriorating labour market conditions. The interest rate cut cycle that began at the end of 2024 came to a halt at the beginning of 2025 and the next cut did not come before September. Thus the base rate was reduced by a total of 75 basis points, to 3.5-3.75%, by the end of the year. There is still significant tension in the bond market, because the debt-to-GDP ratio is at an all-time high, around 125%, and the deficit remained at an elevated level, above 5% of GDP, because despite the significant improvement in the budget balance thanks to tariff revenues, the Trump administration's Big Beautiful Bill extended tax breaks, while the promised spending cuts were not implemented.

Despite the tariff war and increasing geopolitical tensions, the eurozone's recovery from previous shocks (energy crisis, war, inflation, and interest rate shocks) continued throughout 2025. Adding to the euro area economy's problems, the block is forced to reallocate huge amounts of money to defence spending. Meanwhile, the car industry, the flagship of the European manufacturing industry, is lagging behind in technological transition. In 2025, the eurozone's GDP expanded by 1.5% including Ireland's extremely volatile figures; without Ireland, the growth rate is 1.0%. The unemployment rate was at a historic low of 6.2% in December. Inflation was still well above the 2% target in the first months of the year, but in the rest of the year both headline and core inflation fell back, drawing closer to the ECB's target. Wage growth, which had previously fuelled inflation, slowed in the second half of 2025, so by the end of the year only the high level of services inflation was a cause for concern. In the first half-year, the ECB cut the effective (deposit) rate from 2.75% to 2.0%, the main refinancing rate from 3.15% to 2.15%, and the marginal lending rate from 3.15% to 2.4%, and they remained at these level until the end of the year. In Europe, investors also focus on concerns about fiscal sustainability, especially in France, which is struggling with 110% public debt and 6% deficit, as well as political crises.

Hungary's economy has been practically stagnant since 2023 on account of the energy crisis, shrinking export markets, strong exposure to the automotive and battery industries, the freezing of EU funds, the collapse of the previous investment boom, and pressure for strictness in economic policy. Although fiscal austerity ended in 2025 and Europe's growth also improved towards the end of 2025, Hungary's economic growth remained pale throughout last year, when GDP expanded by barely 0.4%, according to preliminary

data from the KSH statistical office, as consumption growth was offset by shrinking investment and declining exports. The tightness of the labour market clearly decreased during the year, but the unemployment rate did not increase meaningfully.

By the beginning of 2025, headline and constant tax core inflation (the latter is closely watched by the MNB) both accelerated to almost 6%. The reasons for the walking inflation are manifold: inflation expectations stuck at elevated levels, corporations' rapid repricing, the weak forint at the end of 2024, rising food prices, excessively high wage dynamics, and passed-on special taxes all contributed. The government and the MNB both reacted to the high inflation. The government has been curbing price increases with a number of administrative measures since spring 2025, which have held back price growth by around 1.5 percentage points. In order to achieve the inflation target, the MNB's new leadership broke with the policy of the weak forint and, despite expectations of an interest rate cut, left the key interest rate at 6.5% until the end of 2025. This, together with several other favourable factors, strengthened the forint, helping to bring down the EUR/HUF below 385 by the end of 2025, from around 410 at the year-beginning.

According to the Ministry of National Economy, Hungary's budget deficit amounted to 4.9% of GDP in 2025, while public debt could be around 74.6% of GDP, in an increase from 73.5% at the end of 2024. The government announced a string of fiscal stimulus measures in 2025, but most of them will affect the budget from 2026 onwards.

Given that Hungary's current account surplus is around 2% of GDP, the gross external debt ratio is between 60% and 65% of GDP, and as foreign exchange reserves are about EUR 10 billion higher than the reserve adequacy rules require, Hungary's external balance position is much stronger than the level that be considered sustainable.

All international credit rating agencies rated Hungary's sovereign debt as investment grade last year.

In 2025, Hungary's housing market was significantly boosted by the expansion of available subsidies, the Home Start programme, which reduced the effective lending rate to 3%, and by the rapid wage growth. As a result, the growth of household credit volumes accelerated to 14% (from 9% at the end of 2024), and that of housing loans to 20%, up from 13%.

## **DIGITAL AND IT INNOVATIONS**

OTP Bank aims for global leadership in digital service offering and sales, while constantly enhancing customer engagement on digital channels both in Retail and Non-retail segments. Today, 70% of OTP Bank Hungary's clients are digitally active, and the mobile app became the primary customer interface for retail clients. Our platform now offers hundreds of features that allow retail customers to track finances, transact, borrow, and invest with ease. Our goal is to provide an exceptional customer experience and to elevate our current app rating and satisfaction level even further.

As digital engagement rises, digital sales have surged. In just two years, we increased our digital sales share from 18% to nearly 60%, outperforming our target benchmark and reaching the upper quartile in Central Europe. Progress is supported not only by enhancements to online sales processes but also by targeted digital campaigns. As a result of long and persistent work, by 2025, all of our relevant consumer lending products became available online. In 2025 we introduced the instant loan product satisfying micro-financing needs of our customers – with a very simple application process, working with 7/24 disbursement.

We are boosting operational efficiency through a robust self service framework enhanced with new AI driven components. Beyond strengthening core digital capabilities, we are investing heavily in AI development, embedding beyond banking services, and enhancing our fraud prevention systems. OTP Bank applies very advanced online fraud prevention technology: our comprehensive and adaptive solution enhances the security and efficiency of our services without compromising our customers' user experience.

In 2024-2025 we significantly advanced our NFC enabled selfie onboarding capabilities across the youth segment. Following the successful delivery of account opening for children under 14 in 2024, we extended mobile app-based onboarding to customers aged 14-18 in 2025.

The Bank focuses on the continuous upgrades of the Personal Finance Management (PFM) toolset, which supports our users in making more conscious financial decisions. In 2025, OTP Bank launched its innovative Round up feature for Piggy Bank, introducing a smarter and more effortless way to save.

Our "Request Money Easily" feature, which – first in Hungary – enables our retail customers to easily and free of charge request money from partners using any bank's mobile application within OTP MobileBank, leveraging the instant payment system and the tap based technology of mobile applications.

As the first Hungarian bank, we made the Click to Pay service available to both VISA and Mastercard cardholders.

**BRANCH NETWORK OF OTP BANK**

The Bank provides a full range of commercial banking services through a nationwide network and its branches are available to customers in Hungary.

1011 Budapest, Iskola utca 38-42.	1133 Budapest, Váci út 80.	2230 Gyömrő, Szent István út 17.
1015 Budapest, Széna tér 7.	1134 Budapest, Váci út 17.	2234 Maglód, Esterházy utca 1.
1021 Budapest, Húvösvölgyi út 138.	1135 Budapest, Lehel út 70-76.	2300 Ráckeve, Szent István tér 3.
1024 Budapest, Fény utca 11-13.	1138 Budapest, Váci út 135-139	2310 Szigetszentmiklós, Ifjúság útja 17.
1025 Budapest, Szépvölgyi út 4/b.	1143 Budapest, Hungária krt. 17.	2330 Dunaharaszti, Dózsa György út 25.
1025 Budapest, Törökvész út 1/a	1146 Budapest, Thököly út 102/b.	2340 Kiskunlacháza, Dózsa György út 219.
1033 Budapest, Szentendrei út 115.	1147 Budapest, Csömöri út 13-19.	2360 Gyal, Kőrösi út 160.
1033 Budapest, Flórián tér 15.	1152 Budapest, Szentmihályi út 131.	2370 Dabas, Bartók Béla út 46.
1037 Budapest, Bécsi út 154.	1163 Budapest, Jókai Mór utca 3/b.	2400 Dunaújváros, Dózsa György út 4/e.
1039 Budapest, Heltai Jenő tér 2.	1173 Budapest, Pesti út 5-7.	2440 Százhalombatta, Szent István tér 8.
1042 Budapest, Árpád út 63-65.	1173 Budapest, Ferihegyi út 93.	2457 Adony, Petőfi Sándor utca 2.
1042 Budapest, Árpád út 183.-185.	1181 Budapest, Üllői út 377.	2483 Gárdony, Szabadság út 18.
1051 Budapest, Nádor utca 16.	1191 Budapest, Üllői út 201.	2500 Esztergom, Rákóczi tér 2-4.
1052 Budapest, Deák Ferenc utca 7-9.	1195 Budapest, Vak Bottyán út 75 a-c	2510 Dorog, Bécsi út 33.
1054 Budapest, Szabadság tér 7-8.	1195 Budapest, Üllői út 285.	2536 Nyergesújfalu, Kossuth Lajos utca 126.
1054 Budapest, Széchenyi rkp. 19.	1204 Budapest, Kossuth Lajos utca 44-46.	2600 Vác, Széchenyi utca 3-7.
1055 Budapest, Szent István krt. 1.	1211 Budapest, Kossuth Lajos utca 86.	2651 Rétság, Rákóczi út 28-30.
1055 Budapest, Nyugati tér 9.	1211 Budapest, Kossuth Lajos utca 99.	2660 Balassagyarmat, Rákóczi fejedelem utca 44.
1062 Budapest, Váci út 1-3.	1221 Budapest, Kossuth Lajos utca 31.	2700 Cegléd, Szabadság tér 6.
1066 Budapest, Oktogon tér 3.	1222 Budapest, Nagytétényi út 37-45.	2730 Albertirsa, Vasút utca 4/a.
1075 Budapest, Károly krt. 25.	1238 Budapest, Grassalkovich út 160.	2750 Nagykőrös, Szabadság tér 2.
1076 Budapest, Thököly út 4	1239 Budapest, Bevásárló utca 2.	2760 Nagykáta, Bajcsy-Zsilinszky utca 1.
1081 Budapest, Népszínház utca 3-5.	2000 Szentendre, Pannónia út 1-3.	2800 Tatabánya, Bárdos László utca 2.
1083 Budapest, Futó utca 35-45	2013 Pomáz, József Attila utca 17.	2800 Tatabánya, Fő tér 32.
1085 Budapest, József krt. 33.	2030 Érd, Iparos út 5.	2840 Oroszlány, Rákóczi Ferenc út 84.
1085 Budapest, Kálvin tér 12-13.	2030 Érd, Budai út 24.	2870 Kisbér, Batthyány tér 5.
1087 Budapest, Könyves Kálmán krt. 76-1. sz.	2040 Budaörs, Szabadság utca 131/a.	2890 Tata, Ady Endre utca 1-3.
1094 Budapest, Ferenc krt. 13.	2040 Budaörs, Sport út 2-4.	2900 Komárom, Mártírok útja 23.
1097 Budapest, Könyves Kálmán krt. 12-14.	2060 Bicske, Bocskai köz 1.	2941 Ács, Gyár utca 14.
1102 Budapest, Kőrösi Csoma sétány 6.	2083 Solymár, Szent Flórián utca 2.	3000 Hatvan, Kossuth tér 8.
1103 Budapest, Sibrik Miklós utca 30.	2085 Pilisvörösvár, Fő utca 60.	3021 Lőrinci, Szabadság tér 25/A
1106 Budapest, Őrs vezér tere 25	2092 Budakeszi, Fő utca 174.	3060 Pásztó, Fő utca 73/a.
1115 Budapest, Bartók Béla út 92-94.	2100 Gödöllő, Szabadság tér 12-13.	3070 Bátortereny, Bányász utca 1/a.
1117 Budapest, Hunyadi János út 19.	2112 Veresegyház, Fő út 52	3100 Salgótarján, Rákóczi út 22.
1117 Budapest, Móricz Zsigmond körtér 18.	2120 Dunakeszi, Nadas utca 6.	3200 Gyöngyös, Fő tér 1.
1117 Budapest, Október huszonharmadika utca 8-10.	2120 Dunakeszi, Barátság utca 29.	3245 Recsk, Kossuth Lajos út 93.
1119 Budapest, Hadak útja 1.	2141 Csömör, Határ út 6.	3300 Eger, Törvényház utca 4.
1123 Budapest, Alkotás utca 53	2151 Fót, Móricz Zsigmond utca 23/A	3300 Eger, Széchenyi István utca 2.
1124 Budapest, Apor Vilmos tér 11.	2170 Aszód, Kossuth Lajos utca 42-46.	3360 Heves, Hősök tere 4.
1126 Budapest, Böszörményi út 9-11.	2200 Monor, Kossuth Lajos utca 67.	3390 Füzesabony, Rákóczi Ferenc út 77.
	2220 Vecsés, Fő utca 246-248	
	2220 Vecsés, Fő utca 170.	

3400 Mezőkövesd, Mátyás király út 149.	4900 Fehérgyarmat, Móricz Zsigmond utca 4.	6430 Bácsalmás, Szent János utca 32.
3527 Miskolc, József Attila utca 87.	5000 Szolnok, Szapáry utca 31.	6440 Jánoshalma, Rákóczi Ferenc utca 10.
3530 Miskolc, Uitz Béla utca 6.	5000 Szolnok, Nagy Imre krt. 2/a.	6449 Mélykút, Petőfi tér 18.
3530 Miskolc, Rákóczi Ferenc utca 1.	5100 Jászberény, Lehel vezér tér 28.	6500 Baja, Deák Ferenc utca 1.
3535 Miskolc, Árpád út 2.	5123 Jászárokszállás, Rákóczi Ferenc utca 4-6.	6600 Szentes, Kossuth Lajos utca 26.
3580 Tiszaújváros, Szent István út 30.	5130 Jászapáti, Kossuth Lajos út 2-8.	6640 Csongrád, Szentháromság tér 2-6.
3600 Ózd, Városház tér 1/a.	5200 Törökszentmiklós, Kossuth Lajos utca 141.	6720 Szeged, Takaréktár utca 7.
3630 Putnok, Kossuth Lajos utca 45.	5300 Karcag, Kossuth Lajos tér 15.	6720 Szeged, Aradi vértanúk tere 3.
3700 Kazincbarcika, Egressy Béni út 50.	5310 Kisújszállás, Szabadság tér 6.	6724 Szeged, Rókusi krt. 42-64.
3770 Sajószentpéter, Bethlen Gábor utca 1/a.	5340 Kunhegyes, Szabadság tér 4.	6724 Szeged, Londoni krt. 3.
3780 Edelény, Tóth Árpád út 1.	5350 Tiszafüred, Piac tér 3.	6760 Kistelek, Kossuth Lajos utca 6-8
3860 Encs, Bem József utca 1.	5400 Mezőtúr, Szabadság tér 29.	6782 Mórahalom, Szegedi út 3.
3900 Szerencs, Kossuth tér 3/a.	5420 Túrkeve, Széchenyi utca 32-34.	6800 Hódmezővásárhely, Andrássy út 1.
3910 Tokaj, Rákóczi út 37.	5430 Tiszaföldvár, Kossuth Lajos út 191.	6900 Makó, Széchenyi tér 14-16.
3950 Sárospatak, Eötvös utca 2.	5440 Kunszentmárton, Kossuth Lajos út 2.	7000 Sárbogárd, Ady Endre út 172.
3980 Sátoraljaújhely, Széchenyi tér 13.	5500 Gyomaendrőd, Szabadság tér 7	7020 Dunaföldvár, Béke tér 11.
4025 Debrecen, Pásti utca 1-3.	5510 Dévaványa, Árpád utca 32.	7030 Paks, Dózsa György út 33.
4025 Debrecen, Piac utca 45-47.	5520 Szeghalom, Tildy Zoltán utca 4-8.	7090 Tamási, Szabadság utca 33
4025 Debrecen, Hatvan utca 2-4.	5530 Vésztő, Kossuth Lajos utca 72.	7100 Szekszárd, Szent István tér 5-7.
4031 Debrecen, Kishatár utca 7.	5540 Szarvas, Kossuth Lajos tér 1.	7130 Tolna, Kossuth Lajos utca 31.
4032 Debrecen, Egyetem tér 1.	5600 Békéscsaba, Szent István tér 3.	7140 Bátaszék, Budai utca 13.
4032 Debrecen, Füredi út 43.	5600 Békéscsaba, Andrássy út 37-43.	7150 Bonyhád, Szabadság tér 10.
4060 Balmazújváros, Veres Péter utca 3.	5630 Békés, Széchenyi tér 2.	7200 Dombóvár, Dombó Pál utca 3.
4080 Hajdúnánás, Köztársaság tér 17-18/a.	5650 Mezőberény, Kossuth Lajos tér 12.	7300 Komló, Kossuth Lajos utca 95/1.
4100 Berettyóújfalu, Oláh Zsigmond utca 1.	5700 Gyula, Bodoky utca 9.	7400 Kaposvár, Széchenyi tér 2.
4110 Biharkeresztes, Kossuth utca 4.	5720 Sarkad, Árpád fejedelem tér 5.	7500 Nagyatád, Korányi Sándor utca 6.
4130 Derecske, Köztársaság út 111.	5742 Elek, Gyulai út 5.	7561 Nagybjom, Fő utca 107
4150 Püspökladány, Kossuth utca 4.	5800 Mezőkovácsháza, Árpád utca 177.	7570 Barcs, Séta tér 5.
4181 Nádudvar, Fő út 119.	5820 Mezőhegyes, Zala György ltp. 7.	7621 Pécs, Rákóczi út 44.
4200 Hajdúszoboszló, Szilfákalja utca 6-8.	5900 Orosháza, Kossuth Lajos utca 20.	7621 Pécs, Rákóczi út 1.
4220 Hajdúböszörmény, Kossuth Lajos utca 3.	6000 Kecskemét, Szabadság tér 5.	7622 Pécs, Bajcsy-Zsilinszky utca 11/1.
4242 Hajdúhadház, Kossuth utca 2.	6000 Kecskemét, Dunaföldvári út 2.	7632 Pécs, Diána tér 14.
4244 Újfehértó, Fő tér 15.	6000 Kecskemét, Korona utca 2.	7633 Pécs, Ybl Miklós utca 7/3.
4254 Nyíradony, Árpád tér 6.	6050 Lajosmizse, Dózsa György út 102/a.	7700 Mohács, Széchenyi tér 1
4300 Nyírbátor, Zrínyi utca 1.	6060 Tiszakécske, Béke tér 6.	7754 Bóly, Hősök tere 8/b.
4320 Nagykálló, Árpád utca 10.	6080 Szabadszállás, Dózsa György út 1.	7773 Villány, Baross Gábor utca 36.
4400 Nyíregyháza, Rákóczi utca 1.	6090 Kunszentmiklós, Kálvin tér 11.	7800 Siklós, Felszabadulás utca 60-62.
4440 Tiszavasvári, Kossuth Lajos utca 6.	6100 Kiskunfélegyháza, Petőfi tér 1	7900 Szigetvár, Vár utca 4.
4501 Kemece, Móricz Zsigmond utca 18.	6120 Kiskunmajsa, Csendes köz 1.	7940 Szentlőrinc, Munkácsy Mihály utca 16/A
4561 Baktalórántháza, Köztársaság tér 4.	6200 Kiskőrös, Petőfi Sándor tér 13.	7960 Sellye, Köztársaság tér 4.
4600 Kisvárd, Szent László utca 30.	6230 Soltvadkert, Szentháromság utca 2.	8000 Székesfehérvár, Fő utca 7.
4625 Záhony, Ady Endre út 27-29.	6237 Kecel, Császártöltési utca 1.	8000 Székesfehérvár, Ősz utca 13.
4700 Mátészalka, Szalkay László utca 34.	6300 Kalocsa, Szent István király út 43-45.	8000 Székesfehérvár, Holland fasor 2.
4765 Csenger, Ady Endre utca 1.	6320 Solt, Kossuth Lajos utca 48-50.	8060 Mór, Deák Ferenc utca 2.
4800 Vásárosnamény, Szabadság tér 33.	6400 Kiskunhalas, Sétáló utca 7	8100 Várpalota, Újlaky út 2.
		8130 Enying, Kossuth Lajos utca 43.

8154 Polgárdi, Deák Ferenc utca 16.	8790 Zalaszentgrót, Batthyány Lajos utca 11.	9400 Sopron, Várkerület út 96.
8200 Veszprém, Brusznai Árpád utca 1.	8800 Nagykanizsa, Erzsébet tér 23.	9400 Sopron, Teleki Pál út 22./A
8220 Balatonalmádi, Baross Gábor út 2.	8800 Nagykanizsa, Deák tér 15.	9431 Fertőd, Fő utca 7.
8230 Balatonfüred, Petőfi Sándor utca 8.	8840 Csurgó, Petőfi tér 20/A	9500 Celldömök, Kossuth Lajos utca 18.
8300 Tapolca, Fő tér 2.	8900 Zalaegerszeg, Kisfaludy Sándor utca 15-17.	9600 Sárvár, Batthyány utca 2.
8330 Sümeg, Kisfaludy Sándor tér 1.	8960 Lenti, Dózsa György út 1.	9700 Szombathely, Király utca 10.
8360 Keszthely, Kossuth Lajos utca 38.	9022 Győr, Teleki László utca 51.	9700 Szombathely, Rohonci út 52.
8380 Hévíz, Erzsébet királyné utca 11.	9024 Győr, Kormos István utca 6.	9700 Szombathely, Fő tér 3-5.
8400 Ajka, Szabadság tér 18.	9024 Győr, Bartók Béla út 53/b.	9730 Kőszeg, Kossuth Lajos utca 8.
8420 Zirc, Rákóczi tér 15.	9026 Győr, Egyetem tér 1.	9737 Bük, Kossuth utca 1-3.
8500 Pápa, Fő tér 22.	9027 Győr, Budai út 1.	9800 Vasvár, Alkotmány utca 2.
8600 Siófok, Fő tér 10/a	9200 Mosonmagyaróvár, Fő utca 24	9900 Körmend, Vida József utca 12.
8630 Balatonboglár, Dózsa György utca 1.	9300 Csorna, Soproni út 58.	9970 Szentgotthárd, Mártírok út 2.
8640 Fonyód, Ady Endre utca 25.	9330 Kapuvár, Szent István király utca 4-6.	9970 Szentgotthárd, Füzesi út 15.
8700 Marcali, Rákóczi utca 6-10.		

## STATEMENT ON CORPORATE GOVERNANCE PRACTICE

### Corporate governance practice

OTP Bank Plc., being registered in Hungary, has a corporate governance policy that complies with the provisions on companies of the act applicable (Civil Code). As the company conducts banking operations, it also adheres to the statutory regulations pertaining to credit institutions.

Beyond fulfilling the statutory requirements, as a listed company on the Budapest Stock Exchange (BSE), the company also makes an annual declaration on its compliance with the BSE's Corporate Governance Recommendations. After being approved by the General Meeting, this declaration is published on the websites of both the Stock Exchange ([www.bet.hu](http://www.bet.hu)) and the Bank ([www.otpbank.hu](http://www.otpbank.hu)).

### System of internal controls

OTP Bank Plc., as a provider of financial and investment services, operates a closely regulated and state-supervised system of internal controls.

OTP Bank Plc. has detailed risk management regulations applicable to all types of risks (credit, country, counterparty, market, liquidity, operational, compliance), which are in compliance with the regulations on prudent banking operations. The Bank Group pays special attention to the management of ESG risks and the implementation of climate protection aspects in business practice. Its risk management system extends to cover the identification of risks, the assessment and analysis of their impact, elaboration of the required action plans and the monitoring of their effectiveness and results. The business continuity framework is intended to provide for the continuity of services. Developed on the basis of international methodologies, the lifecycle model includes process evaluation, action plan development for critical processes, the regular review and testing of these, as well as related DRP activities.

As one of the internal lines of defence of priority importance, the independent internal audit unit of the OTP Bank Plc. assists in the legally compliant and effective management of assets and liabilities and the protection of property; it supports secure business operation, the effective operation of internal control systems, the minimisation of risks, and it also detects and reports differences and deviations from the provisions of the statutory regulations and internal policies and their underlying causes, makes recommendations for the elimination and prevention of deficiencies and for strengthening controls, and monitors the implementation of the measures. The independent internal audit annually and quarterly prepares group-level reports on control actions and audit results for the executive boards. Once a year, the independent internal audit with the prior opinion of the Audit Committee draws up, for the Supervisory Board, the Board of Directors and the Risk Assumption and Risk Management Committee, objective and independent reports in respect of the operation of risk management, internal control mechanisms and corporate governance functions. Furthermore, in line with the provisions of the Credit Institutions Act, reports, once a year, to the Supervisory Board and the Board of Directors on the regularity of internal audit tasks, professional requirements and the conduct of audits, and on the review of compliance with IT and other technical conditions needed for the audits.

In line with the regulations of the European Union, the applicable Hungarian laws and supervisory recommendations, OTP Bank Plc. operates an independent organisational unit with the task of identifying and managing compliance risks. The Compliance Directorate prepares a report quarterly to the Executive Steering Committee, the Risk Assumption and Risk Management Committee, the Board of Directors, and the Supervisory Board, about the Bank's and the Bank Group's compliance activities and position.

## IT controls

Applications are developed by either in-house group resources or by third parties. OTP Bank applies administrative, logical and physical control measures commensurate with the risk in order to protect the IT systems storing and processing data, as follows:

- access to data/systems is only possible on the basis of a predefined authorisation management process that applies the principle of least privilege, ensures segregation of responsibilities, that has regular access right reviews and ensures that dismissed employees' access is revoked in a timely manner;
- user authentication, authorisation and password management processes are controlled by policies and audited;
- the systems have test and development environments with appropriate separation from the production environments that have a secure change management procedure, which ensures that program developments or modifications can only be deployed to the operational environment after proper, controlled testing and approval;
- systems are protected by appropriate network perimeter protection, various security devices and network segmentation, furthermore all network communications are protected with state-of-the-art encryption;
- the IT systems that store and process data are regularly backed up and backup media is stored in controlled premises with adequate protection for long-term retention, and the organisation carries out regular backup restore tests;
- adequate redundancy is applied for IT systems that store and process data to ensure business continuity and disaster resiliency;
- has developed DRPs and BCPs for critical systems and critical business processes, which are regularly tested and reviewed;
- the Bank collects and retains the complete log of all major IT operations and IT security relevant data processing activities and the confidentiality, availability, integrity, authenticity and non-repudiation of these audit logs are ensured;
- there is a continuous, up-to-date protection against malicious codes;
- it ensures the regular implementation of vendor patches and updates for the environments used;
- it uses a data leakage protection (DLP) solution to reduce the risk of inadvertent data loss;
- it ensures the continuous monitoring of the operation events of the physical and virtual environment system elements with automated event detection and management tools;
- the above measures are documented at an appropriate level, which ensures the traceability of the implementation of data security requirements in a transparent manner;
- it ensures permanent secure deletion of the data stored on the media, the destruction of the media and the documentation of the destruction of the media during secure operational media disposal processes;
- it enforces data protection requirements already at the design stage of the implementation of the IT systems storing and processing personal data and of the systems operational processes related to them;
- acquire and maintain ability to adequately handle application related security events (including cyber threats), entailing prevention, detection, identification, isolation, analysis, recovery and reporting;
- remote work is regulated in a controlled and documented way, remote device and user access is protected with multi-factor authentication;
- ensures IT security compliance by its managed regulative framework;
- revision and update of IT security regulations bi-yearly or in a frequency complying legislative requirements or upon major changes;
- ensures vulnerability assessments and penetration tests are carried out as planned;
- defines pools for categorization of installed software into preferred, allowed and prohibited and ensures compliance to that policy.
- it ensures that its employees have adequate knowledge of data protection requirements and provides regular data protection and information security awareness training for them.

## General Meeting

The General Meeting is the supreme governing body of OTP Bank Plc. The regulations pertaining to its operation are set forth in the Company's Articles of Association, and comply fully with both general and special statutory requirements. Information on the General Meeting is available in the Corporate Governance Report.

### Regulations and information to be presented in the Business Report concerning securities conferring voting rights issued by the Company and senior officials, according to the effective Articles of Association, and ownership structure

The Company's registered capital is HUF 28,000,001,000, that is twenty-eight thousand million one thousand Hungarian forint, divided into 280,000,010 that is Two hundred and eighty million and ten dematerialised ordinary shares with a nominal value of HUF 100 each, and a total nominal value of HUF 28,000,001,000, that is twenty-eight billion one thousand Hungarian forint.

The ordinary shares of the Company specified all have the same nominal value and bestow the same rights in respect of the Company.

There are no restrictions in place concerning the transfer of issued securities constituting the registered capital of the Company.

No securities with special control rights have been issued by the Company.

Special Employee Partial Ownership Plan Organization No. I. of OTP Employees and Special Employee Partial Ownership Plan Organization No. II. of OTP Employees (hereinafter referred to as: OTP SEPOPs) were established based on the decision of the Company's certain employees and executives considered as employees pursuant to the Act XLIV of 1992 on Employee Partial Ownership Plan. Management rights of OTP SEPOPs are exercised by a trust named *Alapítvány az OTP Munkavállalók Különleges Résztulajdonosi Programjáért*, founded by the same employees setting up OTP SEPOPs. The Company did not participate either in foundation or in management of OTP SEPOPs.

The Company in line with the ESOP Act initiated an employee share ownership plan having a remuneration purpose and founded OTP Bank ESOP Organization for its execution (hereinafter referred to as ESOP Organization). Pursuant to the laws, the management rights over the ESOP Organization are exercised by a law firm, the so called trustee. In the case of the ESOP Organization Szűcs Law Firm is entitled to exercise the authorities of the trustee. The Company participated in the foundation of the ESOP Organization, however, after its foundation it cannot participate in its management, and according to the laws, it is not entitled to either give orders or to recall the trustee.

Rules on the restrictions of the voting rights:

The Company's ordinary shares confer one vote per share.

An individual shareholder or group of shareholders may not exercise voting rights in respect of in an extent exceeding 25%, or – if the voting rights of another shareholder or group of shareholders exceed 10% – exceeding 33% of the total voting rights represented by the shares conferring voting rights at the Company's General Meeting.

The shareholder is obliged to notify the Company's Board of Directors without delay if the shareholder directly or indirectly, or together with other shareholders in the same group of shareholders, holds more than 2% of the voting rights represented by the shares conferring voting rights at the Company's General Meeting. Concurrently with this, the shareholder is obliged to designate the shareholders through which the indirect voting right exists, or the members of the group of shareholders. In the event of a failure to provide such notification, or if there are substantive grounds for assuming that the shareholder has made a misleading declaration regarding the composition of the shareholder group, then the shareholder's voting right shall be suspended and may not be exercised until the shareholder has met the above obligations. The notification obligation stipulated in this paragraph and the related legal consequences are also incumbent upon individuals who are classified or may be classified as the Company's shareholders under Article 61 of the Capital Markets Act. The Company must also be provided with proof of the conditions for exemption from the notification obligation in accordance with Section 61 (7)-(8) and (11) and Section 61 (10), (11a) and (12), of the Capital Markets Act.

Shareholder group: the shareholder and another shareholder, in which the former has either a direct or indirect shareholding or has an influence without a shareholding (collectively: a direct and/or indirect influence); furthermore: the shareholder and another shareholder who is exercising or is willing to exercise its voting rights together with the former shareholder, regardless of what type of agreement between the participants underlies such concerted exercising of rights.

For determining the existence and extent of the indirect holding, the rules of the Credit Institutions Act relating to the calculation of indirect ownership shall be applied.

If the voting rights that may be exercised by a shareholder group exceed the threshold stipulated above, the voting rights shall be reduced in such a way that the voting rights relating to the shares most recently acquired by the group of shareholders shall not be exercisable.

If there are substantive grounds to presume that the exercising of voting rights by any shareholder or shareholders might result in a breach of the rules of the Capital Markets Act relating to the acquisition of a controlling interest, the Board of Directors' authorised representative responsible for the registration of shareholders at the venue of the General Meeting, or the Chairman of the General Meeting, may exclude the affected shareholders from attending the General Meeting or exercising voting rights.

The General Meeting has exclusive authority with respect to the following matters:

- changes to the rights associated with specific series of shares, or the transformation of certain categories or classes of shares; (qualified majority)
- the decision regarding the delisting of the shares (qualified majority). When making the decisions, shares embodying multiple voting rights shall represent one share.

The Company is not aware of any kind of agreements among the owners that could give rise to the restriction of the transfer of issued securities and/or the voting rights.

Rules on the appointment and removal of executive officers, and rules on amendment of the Articles of Association:

The Board of Directors has at least 5, and up to 11 members.

When making the decisions, shares embodying multiple voting rights shall represent one share. The members of the Board of Directors are elected by the General Meeting based on its decision uniformly either for an indefinite period or for five years; in the latter case the mandate ends with the General Meeting concluding the fifth financial year following the election. The mandate of a member elected during this period expires together with the mandate of the Board of Directors.

The Board of Directors elects a Chairman and may elect one or more Deputy Chairmen, from among its own members, whose period of office shall be equal to the mandate of the Board of Directors. The Chairman of the Board of Directors is also the Chief Executive Officer (Chairman & CEO) of the Company, unless the Board of Directors decides within its competence that the position of Chairman of the Board of Directors and the Chief Executive Officer of the Company are held by separate persons.

The membership of the Board of Directors ceases to exist by

- a. expiry of the mandate,
- b. resignation,
- c. recall,
- d. death,
- e. the occurrence of grounds for disqualification as regulated by law.
- f. termination of the employment of internal (executive) Board members.

The General Meeting has exclusive authority with respect to the following matters:

- the recall of members of the Board of Directors, the Supervisory Board and Audit Committee, and of the auditor; (qualified majority)

More than one third of the members of the Board of Directors and the non-executive members of the Supervisory Board may be recalled within a 12-month period only if any shareholder holds more than 33% of the shares issued by the Company, which have been obtained by the shareholder by way of a public purchase offer.

- except in the cases referred by these Articles of Association to the authority of the Board of Directors, the establishment and amendment of the Articles of Association; (qualified majority); the General Meeting decides on proposals concerning the amendment of the Articles of Association – based on a resolution passed by shareholders with a simple majority – either individually or en masse.

The Board of Directors is obliged to

- prepare the Company's financial statements in accordance with the Accounting Act, and make a proposal for the use of the profit after taxation;
- prepare a report once a year for the General Meeting, and once every three months for the Supervisory Board, concerning management, the status of the Company's assets and business policy;
- provide for the proper keeping of the Company's business books;
- perform the tasks referred to its authority under the Credit Institutions Act, in particular:
  - ensuring the integrity of the accounting and financial reporting system;
  - elaborating the appropriate strategy and determining risk tolerance levels for each business unit concerned;
  - setting risk assumption limits;
  - providing the necessary resources for the management or risk, the valuation of assets, the use of external credit ratings and the application of internal models.

The following, in particular, come under the exclusive authority of the Board of Directors:

- election of the Chairman & Chief Executive Officer of the Company, and exercising employer's right in respect thereof;
- election of one or more Deputy Chairmen of the Board of Directors;
- determination of the annual plan;
- the analysis and assessment of the implementation of business-policy guidelines, on the basis of the Company's quarterly balance sheet;
- decisions on transactions referred to the authority of the Board of Directors by the Company's organisational and operational regulations;
- decision on launching, suspending, or terminating the performance of certain banking activities within the scope of the licensed activities of the Company;
- designation of the employees entitled to sign on behalf of the Company;
- decision on the increasing of registered capital at the terms set out in the relevant resolution of the General Meeting;
- decision to acquire treasury shares at the terms set out in the relevant resolution of the General Meeting;
- decision on approving internal loans in accordance with the Credit Institutions Act;
- decision on the approval of regulations that fundamentally determine banking operations, or are referred to its authority by the Credit Institutions Act. The following shall qualify as such regulations:
  - the collateral evaluation regulations,
  - the risk-assumption regulations,
  - the customer rating regulations,
  - the counterparty rating regulations,
  - the investment regulations,
  - the regulations on asset classification, impairment and provisioning,
  - the organisational and operational regulations, which contain the regulations on the procedure for assessing requests related to large loans,
  - the regulations on the transfer of signatory rights;
- the decision on approving the Rules of Procedure of the Board of Directors;
- decision on steps to hinder a public takeover procedure;
- decision on the acceptance of a public purchase offer received in respect of treasury shares;
- decision on the commencement of trading in the shares in a regulated market (flotation);
- decision on the cessation of trading in the shares in a given regulated market, provided that the shares are traded in another regulated market (hereinafter: transfer).

The Board of Directors is exclusively authorised to:

- decide, in the cases specified in the Civil Code, on acceptance of the Company's interim balance sheet, subject to the prior approval of the Supervisory Board;
- decide, instead of the General Meeting, to pay an advance on dividends, subject to the preliminary approval of the Supervisory Board;
- make decisions regarding any change in the Company's name, registered office, permanent establishments and branches, and in the Company's activities – with the exception of its core activity – and, in relation to this, to modify the Articles of Association should it become necessary to do so on the basis of the Civil Code or the Articles of Association;
- make decision on mergers (if, according to the provisions of the law on the transformation, merger and demerger of legal entities, the approval of the General Meeting is not required in order for the merger to take place).

The Board of Directors directly exercises employer's rights in respect of the Chairman & CEO. The person affected by a decision may not participate in the decision making. Employer rights in respect of the executive directors of the Company are exercised by the Board of Directors through the Chairman & CEO, with the proviso that the Board of Directors must be notified in advance of the appointment and dismissal of the Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the Chief Executive Officer and by the senior company employees defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors. If the Chairman of the Board of Directors and the CEO are different persons, the employer rights in respect of the other executive directors of the Company (CEO, deputy CEOs) are exercised by the Board of Directors through the Chairman of Board of Directors, with the proviso that the Board of Directors shall be notified in advance of the appointment and dismissal of the CEO and Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the persons defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors.

The Board of Directors may delegate, to individual members of the Board of Directors, to executive directors employed by the Company, and to the heads of the individual service departments, any task that does not come under the exclusive authority of the Board of Directors in accordance with these Articles of Association or a General Meeting resolution.

The Company may acquire treasury shares in accordance with the rules of the Civil Code. The prior authorisation of the General Meeting is not required for the acquisition of treasury shares if the acquisition of the shares is necessary in order to prevent a direct threat of severe damage to the Company (this provision is not applicable in the event of a public purchase offer aimed at buying up the Company's shares), as well as if the Company acquires the treasury shares in the context of a judicial procedure aimed at the settlement of a claim to which the Company is entitled, or in the course of a transformation.

The Company has not made agreements in the meaning of points (j) and (k) in paragraph 95/A of Act No. C of 2000 on Accounting.

## OWNERSHIP STRUCTURE, SHAREHOLDING AND VOTING PROPORTION

Description of owner	Total registered capital					
	1 January 2025			31 December 2025		
	Ownership share	Voting rights <sup>1</sup>	Number of shares	Ownership share	Voting rights <sup>1</sup>	Number of shares
Domestic institution/company	31.57%	32.39%	88,395,584	30.26%	31.90%	84,722,909
Foreign institution/company	54.53%	55.94%	152,679,265	54.37%	57.32%	152,240,896
Domestic individual	10.31%	10.58%	28,878,581	9.08%	9.57%	25,423,825
Foreign individual	0.36%	0.37%	998,943	0.48%	0.51%	1,343,306
Employees, senior officers	0.51%	0.53%	1,435,703	0.50%	0.53%	1,402,070
Treasury shares <sup>2</sup>	2.52%	0.00%	7,049,823	5.15%	0.00%	14,416,678
Government held owner	0.05%	0.05%	139,036	0.05%	0.05%	137,646
International Development Institutions	0.00%	0.00%	3,251	0.04%	0.04%	118,028
Other <sup>3</sup>	0.15%	0.15%	419,824	0.07%	0.07%	194,652
<b>TOTAL</b>	<b>100.00%</b>	<b>100.00%</b>	<b>280,000,010</b>	<b>100.00%</b>	<b>100.00%</b>	<b>280,000,010</b>

<sup>1</sup> Voting rights in the General Meeting of the Issuer for participation in decision-making.

<sup>2</sup> Treasury shares do not include the OTP shares held by ESOP (OTP Bank Employee Stock Ownership Plan Organization). Pursuant to Act V of 2013 on the Civil Code, OTP shares held by the ESOP are not classified as treasury shares, but the ESOP must be consolidated in accordance with IFRS 10 Consolidated Financial Statements standard. On 31 December 2025 ESOP owned 11,714,581 OTP shares.

<sup>3</sup> Non-identified shareholders according to the shareholders' registry.

## NUMBER OF TREASURY SHARES HELD IN THE YEAR UNDER REVIEW (2025)

	1 January	31 March	30 June	30 September	31 December
OTP Bank	7,049,823	9,708,441	10,439,982	12,405,462	14,416,678
Subsidiaries	0	0	0	0	0
<b>TOTAL</b>	<b>7,049,823</b>	<b>9,708,441</b>	<b>10,439,982</b>	<b>12,405,462</b>	<b>14,416,678</b>

SHAREHOLDERS WITH OVER/AROUND 5% STAKE (AS AT THE END OF PERIOD)<sup>1</sup>

Name	Nationality <sup>2</sup>	Activity <sup>3</sup>	Number of shares	Ownership <sup>4</sup>	Voting rights <sup>4,5</sup>	Notes <sup>6</sup>
<b>MOL (Hungarian Oil and Gas Company Plc.)</b>	<b>D</b>	<b>C</b>	<b>24,000,000</b>	<b>8.57%</b>	<b>9.04%</b>	
<b>Groupama Group</b>	<b>F/D</b>	<b>C</b>	<b>14,268,600</b>	<b>5.10%</b>	<b>5.37%</b>	
Groupama Gan Vie SA	F	C	14,140,000	5.05%	5.32%	
Groupama Biztosító Ltd.	D	C	128,600	0.05%	0.05%	
<b>OTP Bank Plc.</b>	<b>D</b>	<b>C</b>	<b>14,416,678</b>	<b>5.15%</b>	<b>0.00%</b>	

<sup>1</sup> As a result of transactions concluded on April 9, 2025, the combined voting rights of Special Employee Partial Ownership Plan Organization No. I. and No. II. of OTP Employees (together referred to as the OTP Special Employee Partial Ownership Plan Organizations) in OTP Bank Plc. increased to 5.02%, corresponding to 13,568,641 ordinary shares. However, by the end of December 2025, their ownership interest was below the 5% threshold and, consequently, they were not included in this table. At the end of 4Q 2025, their combined voting right reached 5.15%.

<sup>2</sup> Domestic (D), Foreign (F).

<sup>3</sup> Custodian (CU), Public Institution (PU), International Development Institutions (ID), Institutional (I), Company (C), Private (PR), Employee or senior officer (E).

<sup>4</sup> Rounded to two decimals.

<sup>5</sup> Voting rights in the General Meeting of the Issuer for participation in decision-making.

<sup>6</sup> Eg, professional investor, financial investor, etc.

**SENIOR OFFICERS, STRATEGIC EMPLOYEES AND THEIR SHAREHOLDING OF OTP SHARES**

as at 31 December 2025

Type <sup>1</sup>	Name	Position	Commencement date of the term	Expiration/termination of the term	Number of shares
IG	dr. Sándor Csányi <sup>2</sup>	Chairman	15/05/1992	2026	141,800
IG	Tamás Erdei	Deputy Chairman	27/04/2012	2026	70,485
IG	Gabriella Balogh	member	16/04/2021	2026	36,993
IG	Mihály Baumstark	member	29/04/1999	2026	63,400
IG	Péter Csányi	member, CEO	16/04/2021	2026	74,440
IG	dr. István Gresa <sup>3</sup>	member	27/04/2012	2026	38,400
IG	Antal Kovács	member	15/04/2016	2026	101,932
IG	György Nagy <sup>4</sup>	member	16/04/2021	2026	17,800
IG	dr. Márton Gellért Vági	member	16/04/2021	2026	29,500
IG	dr. József Vörös	member	15/05/1992	2026	214,514
IG	László Wolf	member, Deputy CEO	15/04/2016	2026	560,038
FB	Tibor Tolnay	Chairman	15/05/1992	2026	54
FB	dr. Gábor Horváth	Deputy Chairman	19/05/1995	2026	0
FB	Klára Bella	member	12/04/2019	2026	1,010
FB	dr. Tamás Gudra	member	16/04/2021	2026	0
FB	András Michnai	member	25/04/2008	2026	1,410
FB	Catherine Paule Granger-Ponchon	member	25/04/2025	2026	0
SP	András Becsei	Deputy CEO			15,000
SP	László Bencsik	Deputy CEO			5,000
SP	András Sebők	Deputy CEO			0
SP	György Kiss-Haypál	Deputy CEO			12,299
SP	Imre Bertalan	MC member			0
SP	dr. Bálint Csere	MC member			15,745
SP	dr. Zoárd Gázmár	MC member			2,250
<b>TOTAL No. of shares held by management</b>					<b>1,402,070</b>

<sup>1</sup> Board Member (IG), Supervisory Board Member (FB), Employee in strategic position (SP)<sup>2</sup> Number of OTP shares owned by dr. Sándor Csányi, Chairman, directly or indirectly: 5,341,800.<sup>3</sup> Number of OTP shares owned by Istvan Gresa, Member of Board of Directors, directly or indirectly: 204,658.<sup>4</sup> Number of OTP shares owned by György Nagy, Member of Board of Directors, directly or indirectly: 951,800.

## Committees<sup>1</sup>

### Members of the Board of Directors

Dr. Sándor Csányi – Chairman  
 Mr. Tamás Erdei – Deputy Chairman  
 Ms. Gabriella Balogh  
 Mr. Mihály Baumstark  
 Mr. Péter Csányi  
 Dr. István Gresa  
 Mr. Antal Kovács  
 Mr. György Nagy  
 Dr. Márton Gellért Vági  
 Dr. József Vörös  
 Mr. László Wolf

### Members of the Supervisory Board

Mr. Tibor Tolnay – Chairman  
 Dr. József Gábor Horváth – Deputy Chairman  
 Ms. Klára Bella  
 Dr. Tamás Gudra  
 Mr. András Michnai  
 Mr. Olivier Péqueux<sup>2</sup>  
 Ms. Catherine Paule Granger-Ponchon<sup>3</sup>

### Members of the Audit Committee

Dr. József Gábor Horváth – Chairman  
 Mr. Tibor Tolnay – Deputy Chairman  
 Dr. Tamás Gudra  
 Mr. Olivier Péqueux<sup>2</sup>  
 Ms. Catherine Paule Granger-Ponchon<sup>3</sup>

The résumés of the committee and board members are available in the Corporate Governance Report/Annual Report.

## Personal changes

On 25 April 2025, at the General Meeting of the Bank, Dr. Sándor Csányi informed the shareholders that, at his initiative, the Board of Directors decided to separate the positions of Chairman and CEO of OTP Bank Plc. with effect from 1 May 2025. Dr. Sándor Csányi will continue to perform the strategic management tasks of the OTP Group as Chairman of the Board of Directors. The Board of Directors appointed Péter Csányi to the position of CEO for an indefinite period.

On 25 April 2025, the Annual General Meeting elected Catherine Paule Granger-Ponchon as a new member of the Supervisory Board of OTP Bank Plc., replacing Olivier Péqueux as an independent member of the board, representing the Groupama Group. Her appointment will last until the date of the Company's Annual General Meeting closing the 2025 business year, but no later than 30 April 2026.

On 25 April 2025, the Annual General Meeting elected Catherine Paule Granger-Ponchon as a new member of the Audit Committee of OTP Bank Plc., replacing Olivier Péqueux as an independent member of the board, representing the Groupama Group. Her appointment will last until the date of the Company's Annual General Meeting closing the 2025 business year, but no later than 30 April 2026.

On 25 April 2025, the Annual General Meeting concerning the audit of OTP Bank Plc.'s separate and consolidated annual financial statements in accordance with International Financial Reporting Standards for the year 2025, the Annual General Meeting elected Ernst & Young Ltd. (001165, H-1132 Budapest, Váci út 20.) as the Company's auditor from 1 May 2025 until 30 April 2026.

On 25 April 2025, the Annual General Meeting elected Ernst & Young Ltd. (001165, H-1132 Budapest, Váci út 20.) for the audit of the Company's sustainability reports for the 2025 business year to provide assurance at the general meeting approving the report for the 2025 business year, but no later than 30 April 2026.

Effective from 1 August 2025 Mr. András Sebők was appointed as deputy Chief Executive Officer to run the Digital Division.

<sup>1</sup> Personal changes can be found in the „Personal and organizational changes” chapter.

<sup>2</sup> Until 25 April 2025

<sup>3</sup> As of 25 April 2025

## Operation of the executive boards

OTP Bank Plc. has a dual governance structure, in which the Board of Directors is the Company's executive management body in its managerial function, while the Supervisory Board is the management body in its supervisory function of the Company. It controls the supervision of the lawfulness of the Company's operation, its business practices and management, performs oversight tasks and accepts the provisions of the Bank Group's Remuneration Policy. The effective operation of Supervisory Board is supported by the Audit Committee, as a committee, which also monitors the internal audit, the risk management, the reporting systems and the activities of the auditor.

In order to assist the performance of the governance functions the Board of Directors founded and operates, as permanent or other committees, such as the Management Committee, the Executive Steering Committee, the Remuneration Committee, the Nomination Committee and the Risk Assumption and Risk Management Committee.

To ensure effective operation OTP Bank Plc. also has a number of further permanent committees.

OTP Bank Plc. gives an account of the activities of the executive boards and the committees every year in its Corporate Governance Report.

The Board of Directors held 7, the Supervisory Board held 7 meetings, while the Audit Committee held 2 meetings in 2025. In addition, resolutions were passed by the Board of Directors on 183, by the Supervisory Board on 91 and by the Audit Committee on 31 occasions by written vote.

## Policy of diversity

OTP Bank Plc. determines and regulates the criteria for the selection of senior executives in line with European Union as well as domestic legal requirements and directives fundamentally determining the operation of credit institutions.

When designating members of the management bodies (Board of Directors, Supervisory Board) as well as appointing members of the Board of Directors and administrative members (Management), OTP Bank Plc. considers the existence of professional preparation, the high-level human and leadership competence, the versatile educational background, the widespread business experience and business reputation of the utmost importance, at the same time, it is also highly committed to taking efficient measures in order to ensure diversity with regard to corporate operation, including the gradual improvement in women's participation rate.

OTP Bank Plc.'s Nomination Committee continuously keeps tracking the European Union and domestic legislation relating to women's quota on its agenda, in that when unambiguously worded expectations are announced, it promptly takes the necessary measures. In accordance with OTP Bank Plc.'s currently approved strategy, the goal is to have at least one female member in both the Board of Directors and the Supervisory Board.

It is important to note, however, that, as a public limited company, the selection of the members of the management bodies falls within the exclusive competence of the General Meeting upon which – beyond its capacity to designate enforcing the above aspects to maximum effect – OTP Bank Plc. has no substantive influence.

According to OTP Bank Plc.'s Articles of Association, a Board of Directors comprising 5-11 members and a Supervisory Board comprising 5-9 members are set up at OTP Bank Plc. Currently the Board of Directors operates with 11 members and has one female member, the Supervisory Board comprises 6 members and has one female member. The management of OTP Bank Plc. currently comprises 6 members and has no female member.

## NON-FINANCIAL STATEMENT – OTP BANK PLC. (STAND-ALONE)

### Environmental policy, environmental projects

The operational activities of OTP Group and OTP Bank require the use of natural resources and energy; however, the resulting environmental impact is significantly lower than the indirect impact associated with the provision of financial services. Among the operational impacts, OTP Group considers greenhouse gas (GHG) emissions to be the most material, while also striving to mitigate its effects beyond this. The Bank's environmental practices also have an awareness-raising function and represent an important element of OTP Group's regional leadership ambitions in the green transition, ensuring consistent application of environmental consciousness in everyday operations.

Management of environmental risks related to financial services and exploration of business opportunities linked to environmental protection are carried out within the framework of the ESG strategy; this chapter does not cover these topics. In general, the Group applies a dual approach: in its own operations, the focus is on reducing direct emissions, improving energy efficiency, and strengthening climate resilience across facilities and processes. For the financed portfolio, the emphasis is on aligning lending and investment activities with the transition to a low-carbon economy, integrating climate risks into lending decisions, and supporting clients in adopting sustainable practices.

OTP Bank mitigates environmental impacts through the following activities:

- Efficient use of resources
- Carbon-neutral operation
- Energy efficiency investment projects (real estate, vehicle fleet)
- Purchase of green electricity, use of renewable energy sources
- Reducing paper use through digitalisation; using recycled paper
- Rationalising business travel
- Improving waste management
- Transparent reporting on the environmental impacts of operation
- Awareness-raising activities for employees and customers

OTP Bank complies fully with environmental legislation; no fines were imposed in 2025. Environmental activities are regulated by the Environmental Policy. The Bank prepares an internal annual environmental report, approved by the responsible senior executive. To enhance work-related and general environmental knowledge, every OTP Bank employee receives environmental training every two years.

### Actions supporting the reduction of Scope 1-2 emissions

In its 2021 ESG strategy, OTP Bank set the goal of achieving carbon-neutral operations by 2030.

To reach this goal, the Bank adopted a decarbonisation plan in 2025, covering Scope 1 and Scope 2 emissions from its direct operations. The plan defines specific reduction targets for emissions from real estate and the vehicle fleet, with a target year of 2030. The targets were developed based on the NGFS scenario, using 2021 and 2024 as base years. In determining the target values, the Bank considered both feasibility and ambition.

Accordingly, OTP Bank plans to reduce GHG emissions from buildings by 41.5% by 2030 compared to the 2021 baseline, and to reduce emissions from its vehicle fleet by 8% compared to the 2024 level.

For real estate, emission reductions will be achieved mainly through targeted energy-efficiency investments and electrification of heating systems. Renovation principles already incorporate energy-efficiency upgrades, supported by building automation systems and installation of solar panels at 19 branches. These measures contribute to reducing both energy consumption and GHG emissions. In addition, the Bank is gradually replacing fossil-fuel-based heating systems with electric heat pumps across branch networks and central buildings.

To support the transition to an electric vehicle fleet, the Bank plans to replace 100 petrol or diesel vehicles by 2030. In the first year of implementation, 2026, 20 vehicles will be electrified. According to projections, the full programme will result in approximately 630 tCO<sub>2</sub>e reduction by 2030, with the 2030 emission level expected to be 210 tCO<sub>2</sub>e lower than in the base year.

OTP Bank's Scope 1 and Scope 2 CO <sub>2</sub> e emissions (t)					
	2021	2022	2023	2024	2025
Direct (Scope 1)	6,548	6,670	6,005	5,565	6,056
Indirect (Scope 2)					
<i>Indirect location-based</i>	9,904	11,496	11,648	8,170	7,424
<i>Indirect market-based</i>	8,369	1,005	1,110	1,124	1,708
Total (Scope 1 + 2) location-based	16,452	18,165	17,653	13,735	13,480
Total (Scope 1 + 2) market-based	14,917	7,675	7,115	6,689	7,764
Total (Scope 1 + 2) with carbon-offset	14,917	675	(485)	(312)	764

OTP Bank Scope 1-2 market-based emissions in 2025 were 7,764 tCO<sub>2</sub>e. Although OTP Bank primarily uses green electricity to cover its energy needs, emissions increased by 16% compared to 2024. The primary reason for this is that the use of natural gas and district heating is still significant, more of which was consumed in 2025 due to the slightly colder average temperature. In addition, in the case of some rented offices and branches, OTP Bank has no influence on the utility consumption, so it could not validate the purchased green electricity there either, and “traditional” electricity consumption also increased to a lesser extent at these locations.

Within the Group, OTP Bank purchased 7,000 tCO<sub>2</sub>e carbon credits in 2025. This volume does not fully cover the Bank's Scope 1-2 emissions. The retired credits were verified according to the Verified Carbon Standard (VCS) by Verra. The Bank considers it important that offsetting projects are located in the Group's countries of operation; therefore, all credits purchased supported a single project: the Sant Nikola Wind Farm near Kavarna, Bulgaria – the largest wind farm in the country. The project is a reduction project and does not qualify as a corresponding adjustment under Article 6 of the Paris Agreement<sup>4</sup>.

OTP Bank is currently seeking to offset its remaining emissions by purchasing carbon credits, but in the future – where feasible – plans to transition towards nature-based solutions, such as the OTP Forest project. The initiative aims primarily to improve biodiversity and ecosystem services, while also supporting additional carbon sequestration through improved forestry practices. The project is implemented in cooperation with Pilisi Parkerdő Zrt., with scientific verification by the University of Sopron's Institute of Environment and Nature Protection. The initiative goes beyond offsetting the Bank's own emissions, with a primary focus on biodiversity and ecosystem benefits alongside enhanced carbon sequestration.

The OTP Forest project, developed jointly with Pilisi Parkerdő Zrt., will also generate additional carbon-sequestration benefits. The 10-year programme is supported with HUF 228 million and contributes to long-term environmental value creation.

<sup>4</sup> The project is 100% a reduction project, implemented entirely within the European Union, and certified based on 100% recognized quality standards.

## Fight against corruption and against the practice of bribery

The Code of Ethics ([https://www.otpbank.hu/static/portal/sw/file/OTP\\_EtikaiKodex\\_EN.pdf](https://www.otpbank.hu/static/portal/sw/file/OTP_EtikaiKodex_EN.pdf)), the Partner Code of Ethics ([https://www.otpbank.hu/static/portal/sw/file/OTP\\_Partneri\\_EtikaiKodex\\_EN.pdf](https://www.otpbank.hu/static/portal/sw/file/OTP_Partneri_EtikaiKodex_EN.pdf)) published in 2023 and the Anti-Corruption Policy of OTP Bank Group, approved in 2019, contains provisions on the fight against corruption and against the practice of bribery, as well as the enforcement of legal, fair and ethical conduct (<https://www.otpgroup.info/ethical-declaration>). As it can be read in the foreword of the Code and the Anti-Corruption Policy as well, the OTP Bank Plc. and its management have adopted the principle of zero tolerance towards corruption and bribery, taking a definite stance against all forms of corruption and giving full support to the fight against corruption. In addition, the Code states that "As an ethical and compliant institution, the Bank and its management are fully committed to ensuring observance of all relevant legislation, including anti-corruption statutes." The OTP Bank Plc. has set up an ethics reporting system (whistleblowing), which is for the reporting and the handling of the reports on suspected or actual violation of the values set forth in the Code of Ethics, where anonymous reporting of ethics issues is also possible. The OTP Bank Plc. conducts inquiries for the purpose of detecting, preventing anomalies in connection with reports made or anomalies it became aware of otherwise.

In 2025, a total of 244 reports were received through the ethics Whistleblowing System of OTP Bank Plc., of which 50 reports were deemed necessary to conduct ethics proceedings. Ethical breaches were identified in 10 cases.

The OTP Bank Plc. has created and maintains its Code of Ethics to keep reputational risk and financial losses, which may incur in relation to corruption, bribery and discrimination, on a minimum level. Both employees and newcomers receive education on the Code of Ethics, and in addition, the acceptance to be bound by it is a prerequisite for their employment.

In addition, all business partners and clients are communicated about the Anti-Corruption Policy and procedures through the Code of Ethics and Anti-Corruption Policy published publicly on the OTP Bank Plc.'s website and from 2023 the Partner Code of Ethics has been published on the Bank's website as well. The Anti-Corruption Policy stipulates that, in view of the fact that existing and established relationships with contractual partners also contain the possibility of corruption, the OTP Bank Plc. will act prudently in its dealings with contractors, in particular in the tendering and preparation process, to minimise the risk of corruption. The OTP Bank Plc. establishes relationships with its contractual partners based on an assessment of professionalism, competence and competitiveness, and does not apply other non-professional selection criteria that contain the possibility of corruption.

Based on the Compliance's proposal, the prohibition of corruption will be reflected in the contractual and regulatory documents used by the OTP Bank Plc. in a clearer and well-defined manner from 2023 onwards, through the inclusion of anti-corruption clauses in the business rules and standard contracts. The clause will state from the very beginning of the business relationship that the contracting partner accepts OTP Bank Plc.'s anti-corruption principles, including the prohibition of corruption and the consequences of breaching this prohibition, which can even be termination of contract.

Any requests from third parties affecting human rights are treated by the OTP Bank Plc. as a priority.

We manage the risks regarding the fight against corruption and bribery within the framework of our operational risk management process. Our quarterly compliance reports cover the changes in risks as well as the steps necessary to manage them. The reports are presented to the Executive Steering Committee and the Board of Directors; the annual report is also submitted to the Supervisory Board.

## CORPORATE STRATEGY

*OTP Group is the leading universal banking group in Central and Eastern Europe, and one of the most successful financial institutions in Europe.*

*OTP Group's strategic objective is to meet the needs and expectations of its customers, investors, and employees at the highest possible level, and to set a positive example from an environmental, social and corporate governance perspective even at international level.*

Our skilled and helpful staff, state-of-the-art IT solutions, and universal yet customisable product offering make us a trustworthy partner for customers in ten countries of the Central and Eastern European region, and in Uzbekistan in Central Asia. The impressive performance of our employees and the value they create are important building blocks of OTP Group's results. We provide regular training courses to support our highly qualified professionals. OTP Group's innovations also enhance our competitiveness and contribute to further strengthening our international position.

The pillars of our strategy are stability & sustainability, growth, innovation and profitability.

### Stability & sustainability

OTP Group's excellent capital and liquidity position provide the fundamentals for stable operation and growth throughout economic cycles. In addition to full compliance with European and local regulations, we promote transparency and prudence, while laying great emphasis to maintaining stability at all times.

OTP Group is committed to enforcing sustainability principles in its socio-economic role and in serving customers, as well as in its own operations. Accordingly, OTP Group aims to be the regional leader in financing a fair and gradual transition to a low-carbon economy and building a sustainable future through our responsible solutions.

As part of our social activities, we make a positive impact through our financial awareness raising and donation programmes, and extensive civil society partnerships. As a responsible employer, we have designed complex programmes for employee well-being.

### Growth

We believe in the future of the Central and Eastern European region and intend to actively contribute to its progress. Our products and services are designed to help the region grow faster than the EU average. We aim to increase our market share on all our markets through organic growth and acquisitions.

We entered Uzbekistan in 2023 with an aim of capitalizing on growth opportunities while becoming the leading retail bank in this underpenetrated market, also supporting the development and transition of the local economy.

Our acquisition strategy is based on creating shareholder value by achieving optimal scale of economics and leveraging OTP's expertise in the regional markets. We keep exploring new acquisition opportunities, primarily in the CEE region, and in other countries with high growth potential, too.

### Innovation

To meet our customers' needs, we develop convenient and contemporary services that are easy and fast to access anytime, from anywhere. OTP Bank's innovations are popular for a good reason – millions of customers use our products and services regularly. Digital developments contribute to enhancing customer experience as well as to improving the efficiency of business processes. To explore new directions and opportunities, we have established our own futurology team and are incorporating best practices. We have hundreds of developments underway. We are partnering with the region's leading fintech companies and have made considerable progress in building beyond-banking ecosystems, in addition to building our own successful fintech company as well.

### Profitability

Profitability is crucial for maintaining stable operations, as well as for continuous development and renewal. Our long-term profitability is underpinned by the revenue margin supported by excellent customer experience and cost-efficient processes, along with geographical diversification, which has been increasing in recent years. The market recognizes our success in creating shareholder value through favourable valuation compared to European and regional peers.

***BRIEF DESCRIPTION OF THE COMPANY'S BUSINESS MODEL***

OTP Bank is a key credit institution in Hungary. Its business model focuses on providing high-quality financial services to retail, private banking, micro and small enterprise, medium- and large corporate, as well as municipal clients, both through its branch network and through continuously developing digital and innovative remote service channels, with ease of use and reliability kept in mind. The Bank offers a full range of retail and corporate banking services: in the course of its activities, it collects deposits from customers and raises funds from the money and capital markets. On the asset side, OTP Bank provides mortgage loans, consumer loans, investment and working capital loans, and loans to municipalities, while investing its liquidity reserves in money and capital market instruments. In addition, the Bank offers its clients a wide array of modern financial services in the fields of wealth management and investment services, payment services, treasury and other financial services.

OTP Bank's Hungarian subsidiaries cover an additional broad spectrum of financial services. At the end of 2025, the Bank and its other domestic group members served more than 4.3 million customers in total.

Through capital investments, the Bank also owns foreign subsidiaries in several countries in Central and Eastern Europe, as well as in Uzbekistan.

## NON-FINANCIAL PERFORMANCE INDICATORS

- **Internal audit:** 251 closed audits, 1,763 recommendations, 1,759 accepted recommendations.
- **Compliance with Budapest Stock Exchange (BSE) Recommendations (yes/no ratio):** 72 yes, 0 no.
- **Bank security investigations, reports:** in 2025, we filed 719 police reports, of which 590 were related to suspected fraud committed to the detriment of customers.

Related to financial abuses, in the segment of retail loans, a loss of HUF 59 million occurred in 2025. A detailed comparison of losses from credit fraud cases in 2025 to those in 2024 shows that losses from cash loan fraud amounted to HUF 39.2 million, while in 2025, this amount decreased to HUF 9.2 million; losses from POS loan fraud cases in 2024 amounted to HUF 1.2 million, while in 2025 no losses were registered from POS loan fraud.

Regarding overdraft, housing loan and state-subsidised family housing allowance (CSOK) applications in 2024 and 2025 no losses were registered due to fraudulent activity. In respect of the Baby Loan Program, the expected losses in 2025 amounted to HUF 11 million, while no such losses were registered in 2024.

In the case of corporate loan fraud, taking into account the SME and corporate segments, in the SME losses increased to HUF 3.1 billion in 2025 (in 2024 the bank's loss amounted to HUF 1.2 billion). As a result of the security screening of submitted applications, due to the suspicion of fraud, several submitted loan applications were rejected, thereby preventing HUF 3.3 billion in potential loss.

With regard to fraud committed to the detriment of the Bank's customers in the online space in 2025, losses resulting from successful payment fraud amounted to HUF 3.5 billion, which is 51.3% lower than in the previous year due to the Bank's security measures. The number of completed fraud cases totalled 6,466, representing a 25.8% decrease compared to the previous year.

In addition, regarding the losses caused to the Bank's customers, as much as HUF 18.8 billion in losses was prevented, owing to the implemented measures, a significant part of which was due to rules implemented for the purpose of blocking access attempts to the customers' accounts, as a result of which as much as HUF 15.8 billion was saved on the customers' accounts.

In 2025, the implemented measures made it possible to prevent approximately 84.3% of potential customer losses, which is 9.1 pps higher than in 2024, when 75.2% of losses were prevented. Owing to the developments introduced and the increased effectiveness of the monitoring system, this ratio improved significantly.

- **Bank card security:** compared to 2024 data, a significant decrease can be perceived in bank card fraud, in both the number of fraud attempts and the loss value of successful fraud. In 2025 the loss from successful bank card fraud cases amounted to HUF 2.1 billion, constituting a nearly 40% decrease. Of this amount, losses from successful transactions with bank cards issued by the Bank amounted to HUF 1.7 billion, which, compared to the data from 2024, is a decrease of almost 48%.
- **Ethics issues:** 244 ethics reports, establishing ethics offences in 10 cases.

**LIST OF NON-AUDIT SERVICES BY SERVICE CATEGORIES USED BY THE BANK**

The statutory audit of OTP Bank is carried out by **Ernst and Young Ltd.**, in addition to which the following services were contracted:

- Assurance engagements other than audits or reviews of historical financial information (ISAE 3000)
- Engagements to review historical financial statements and interim financial statements (ISRE 2400, 2410)
- Issue of Comfort letters
- Engagements to perform agreed-upon procedures regarding financial information (AUP according to ISRS 4400)
- Consultation relating to interpretation and implementation of accounting standards and relating to accounting of potential future transaction
- Reviewing the internal processes and compliance with laws and regulations

**DECLARATION**

On behalf of OTP Bank Plc. we declare that, to the best of our knowledge, the separate and consolidated financial statements which have been prepared in accordance with the applicable accounting standards, present a true and fair view of the assets, liabilities, financial position and profit and loss of OTP Bank Plc. and its consolidated subsidiaries and associates, and give a fair view of the position, development and performance of OTP Bank Plc. and its consolidated subsidiaries and associates, describing the principal risks and uncertainties, and do not conceal facts or information which are relevant to the evaluation of the Issuer's position.

OTP Bank Plc. hereby declares that, pursuant to Sections 95/F (11)-(12) of Act C of 2000 on Accounting ("the Act"), it is exempt from the obligation to prepare a sustainability report for the financial year of 2025, since it prepares consolidated sustainability report as parent company. The location of publication of the consolidated sustainability report prepared by the Bank and the assurance statement issued in accordance with Section 134/L (1) of the Act is as follows: <https://www.otpgroup.info/investor-relations/reports/annual>. The management report hereby indicates the factual exemption according to Section 95/F (11) of the Act.

Budapest, 17 March 2026



Dr. Sándor Csányi  
Chairman of the Board of Directors



Péter Csányi  
Chief Executive Officer

## **MANAGEMENT REPORT 2025 (CONSOLIDATED)**

**CONSOLIDATED FINANCIAL HIGHLIGHTS<sup>1</sup> AND SHARE DATA**

In accordance with the recommendation stated in the current circular of the MNB on the application of MoF Decree no. 24/2008 on the detailed rules regarding the disclosure requirements applicable to publicly offered securities, OTP Bank Plc. as issuer prepares and publishes this Management Report combined with the Business Report required in the Accounting Act in a single document.

Main components of P&L account	2024 HUF million	2025 HUF million	Change %
<b>Consolidated profit after tax</b>	<b>1,076,139</b>	<b>1,146,325</b>	<b>7</b>
Adjustments (after tax)	0	0	
Consolidated adjusted profit after tax	1,076,139	1,146,325	7
Pre-tax profit	1,386,883	1,502,776	8
Operating profit	1,545,377	1,700,173	10
Total income	2,633,908	2,916,962	11
Net interest income	1,782,604	1,944,625	9
Net fees and commissions	545,631	604,324	11
Other net non-interest income	305,673	368,013	20
Operating expenses	(1,088,531)	(1,216,789)	12
Total risk costs	(158,494)	(197,396)	25
Corporate taxes <sup>2</sup>	(310,743)	(356,452)	15
Main components of balance sheet (closing balances)	2024	2025	%
Total assets	43,419,128	45,427,144	5
Total customer loans (net, FX-adjusted)	22,406,860	25,829,350	15
Total customer loans (gross, FX-adjusted)	23,343,126	26,863,462	15
<b>Performing (Stage 1+2) customer loans (gross, FX-adjusted)</b>	<b>22,500,636</b>	<b>25,926,969</b>	<b>15</b>
Allowances for possible loan losses (FX-adjusted)	(936,266)	(1,034,112)	10
<b>Total customer deposits (FX-adjusted)</b>	<b>30,383,499</b>	<b>33,734,266</b>	<b>11</b>
Issued securities	2,593,124	2,512,636	(3)
Subordinated loans	369,359	486,084	32
Total shareholders' equity	5,120,012	5,625,616	10
Performance Indicators	2024	2025	pps
ROE (from profit after tax)	23.5%	21.6%	(1.8)
ROE (from adjusted profit after tax)	23.5%	21.6%	(1.8)
ROA (from profit after tax)	2.6%	2.6%	0.0
ROA (from adjusted profit after tax)	2.6%	2.6%	0.0
Operating profit margin	3.71%	3.80%	0.09
Total income margin	6.32%	6.52%	0.20
Net interest margin	4.28%	4.34%	0.07
Cost-to-asset ratio	2.61%	2.72%	0.11
Cost/income ratio	41.3%	41.7%	0.4
Provision for impairment on loan losses-to-average gross loans ratio	0.38%	0.66%	0.28
Total risk cost-to-asset ratio	0.38%	0.44%	0.06
Effective tax rate	22.4%	23.7%	1.3
Net loan/deposit ratio (FX-adjusted)	74%	77%	3
Capital adequacy ratio (consolidated, IFRS)	20.3%	19.7%	(0.6)
Tier 1 ratio	18.9%	18.1%	(0.9)
Common Equity Tier 1 ('CET1') ratio	18.9%	18.1%	(0.9)
Share data	2024	2025	%
EPS diluted (HUF) (from profit after tax)	4,050	4,434	9
EPS diluted (HUF) (from adjusted profit after tax)	4,066	4,456	10
Closing price (HUF)	21,690	35,100	62
Highest closing price (HUF)	22,100	35,450	60
Lowest closing price (HUF)	15,600	21,520	38
Market Capitalization (EUR billion)	14.8	25.5	72
Book Value Per Share (HUF)	19,346	21,868	13
Tangible Book Value Per Share (HUF)	18,511	21,096	14
Price/Book Value	1.1	1.6	43
Price/Tangible Book Value	1.2	1.7	42
P/E (trailing, from profit after tax)	5.6	8.6	52
P/E (trailing, from adjusted profit after tax)	5.6	8.6	52
Average daily turnover (EUR million)	18	28	53
Average daily turnover (million share)	0.4	0.4	4

<sup>1</sup> Structural adjustments made on consolidated IFRS profit and loss statement as well as balance sheet, together with the calculation methodology of adjusted indicators are detailed in the *Supplementary data* section.

<sup>2</sup> In addition to corporate income taxes, this line includes special taxes on financial institutions (excluding the Hungarian financial transaction levy), the Hungarian local (municipality) taxes and the innovation contributions, as well as the withholding tax applicable to dividend payments by subsidiaries.

## ACTUAL CREDIT RATINGS

S&P GLOBAL	
OTP Bank and OTP Mortgage Bank Ltd. – FX long-term issuer credit rating	BBB
OTP Bank – Dated subordinated FX debt	BB
MOODY'S	
OTP Bank – FX long term deposits	Baa1
OTP Bank – Dated subordinated FX debt	Ba1
OTP Mortgage Bank Ltd. – Covered bonds	A1
SCOPE	
OTP Bank – Issuer rating	BBB+
OTP Bank – Dated subordinated FX debt	BB+
LIANHE	
OTP Bank – Issuer rating (China national scale)	AAA

## ACTUAL ESG RATINGS



## AWARDS

The OTP Group once again reached the top of **The Banker's** ranking of the 100 largest banks in Central and Eastern Europe for 2025, and was also honoured with the Bank of the Year award in three countries: Montenegro, Slovenia and Uzbekistan.

**Global Finance** acclaimed the Group as the region's foremost foreign exchange provider, further commending its outstanding achievements in Hungary and Bulgaria. The magazine also recognized the OTP Group with the 'Best Bank for Sustainable Finance in Hungary for 2026' award, acknowledging its commitment to sustainable finance.

At this year's **Mastercard** Bank of the Year Awards, our bank was honored with the Grand Prize, complemented by a first-place achievement in the Daily Banking category.



## S&P GLOBAL MARKET INTELLIGENCE PERFORMANCE RANKING, 2025

According to S&P Global Market Intelligence's 2025 analysis, OTP Bank delivered the second-best performance among the 50 largest publicly listed banks in Europe.



## RESULTS OF THE 2025 EBA STRESS TEST

Out of 64 European banks, OTP Bank achieved the 13<sup>th</sup> best result on the 2025 EBA stress test based on the ranking in the end-2027 CET1 ratio under the adverse scenario.

## MANAGEMENT'S ANALYSIS OF THE FULL-YEAR 2025 RESULTS OF OTP GROUP

*OTP Group posted an outstanding 2025: apart from the strong financial performance marked by the 21.6% ROE, the share price hit new all-time high levels. In 2025 the Bank paid the highest ever dividend amount, whereas own share buybacks continued, too. The new CEO appointed in 2025 reaffirmed previously set strategic directions. At the same time, consolidated loan volume growth significantly accelerated with credit quality indicators painting a stable picture and the Group maintaining strong liquidity and capital position.*

In 2025 OTP Group achieved **HUF 1,146 billion profit after tax**, corresponding with an **ROE of 21.6%**.

As for the components of the annual profit after tax, there was a 15% or HUF 46 billion y-o-y increase on the corporate income tax line, which, on top of the corporate income taxes, includes the special bank tax payable in Hungary and Slovenia, the Hungarian windfall profit tax, the Hungarian local business tax as well as innovation contribution. The main reason behind the increase in taxes was the HUF 48 billion higher Hungarian windfall profit tax, the gross amount of which went up from HUF 7 billion in 2024 to HUF 54 billion in 2025 (after reduction).

The annual profit before tax improved by 8% y-o-y, fuelled by the **10% increase in operating profit**. Within that, total income grew by 11% y-o-y in HUF terms, and by 12% FX-adjusted and organically, so without the effect of the sale of the Romanian operation completed in 2024. Within core banking revenues, the annual net interest income advanced by 9% y-o-y, while the organic (without the effect of the sale of the Romanian bank) and FX-adjusted increase hit 10%. The key driver behind this was the expansion of business volumes, while the net interest margin also improved by 7 bps, to 4.34%.

The annual net interest margin of OTP Core improved by 28 bps to 3.15%. Hungarian household deposits kept on expanding, while the base rate stood at 6.5% from September 2024 until the end of 2025, and reference rates slightly increased over the last 12 months. Regarding Eurozone countries including Bulgaria, which officially joined the Eurozone in January 2026, the eroding margin trends were to a great extent determined by the ECB rate cuts and the competitive environment. The ECB's deposit facility rate stood at 4.0% at the beginning of 2024, down to 3.0% by the end of 2024, and further down to 2.0% by June 2025. It was favourable that regarding the quarterly margin trajectory within the year, in the fourth quarter of 2025 margins seemed to have stabilized in Eurozone countries and Serbia, while Uzbek and Moldovan margins improved.

Cumulated net fees and commissions went up by 11% y-o-y, driven primarily by the expansion of business volumes as well as transactional turnover. Conversely, in Hungary the increased financial transaction tax rates took their toll from August 2024, and the new FX conversion levy was introduced from October 2024. Also in Hungary, in accordance with the agreement between the Hungarian Banking Association and the Ministry of National Economy dated 9 April 2025, in the case of retail fees OTP Bank reinstated fee rates that applied before the inflation indexation was implemented as permitted by the regulation. Another item negatively affecting the net fee income line was that starting from 2025, certain fee expense-like items previously booked amongst operating costs were shifted to the net fee income line at numerous Group members, in the total amount of HUF 13.8 billion in 2025 as a whole, pulling back y-o-y momentum of net fees.

Annual other net non-interest income jumped by 20%, explained mainly by the higher revenues from FX conversions realized in Russia.

Cumulated operating expenses grew by 14% y-o-y organically and FX-adjusted. Both personnel expenses and depreciation grew in double-digit percentages. Personnel expenses growth was induced primarily by wage inflation typically surpassing inflation, and to a lesser extent by the 1% increase in the annual average headcount, while the increasing depreciation was to a great extent shaped by IT CAPEX. Other expenses growth also exceeded 10%, which was partly explained by the lump-sum recognition in 4Q 2025 of the HUF 20 billion donation<sup>3</sup> amongst other expenses granted for the renovation of the Royal Castle in Gödöllő, announced by the Bank on 13 October 2025. Beside this item, other expenses were shaped mainly by the costs of IT infrastructure and applications, as well as marketing expenses and expert fees. Cost growth was tamed by the above-mentioned reclassification of certain expenditures onto the net fee income line to the tune of HUF 13.8 billion. Also, the realization of Slovenian cost synergies played a role, following the merger of the two banks in 3Q 2024. In Slovenia, operating costs moderated by 4% y-o-y in EUR terms: the headcount declined by 11% compared to the pre-merger level at the end of 2Q 2024, while the branch count shrank by 31%, or 34 units.

<sup>3</sup> Given that such donations granted to foundations performing public duties can be taken into account as a corporate tax base reducing item in 20% higher amount, the present donation's negative impact on the Group's profit after tax was HUF 17.84 billion.

In 2025, total risk costs amounted to HUF 197 billion, 25% higher than in the previous year. Within this amount, provision for impairment on loan losses grew 88%, hitting HUF 169 billion, of which HUF 122 billion was set aside in the Russian books. As a result, the consolidated credit risk cost rate went up to 66 bps from 38 bps in full-year 2024.

In full-year 2025 other provisions represented HUF 29 billion of that HUF 5.7 billion impairment was set aside in the Hungarian and Bulgarian books in relation to Russian government bond exposures. As for the intra-year pattern of Russian bonds-related impairments, HUF 10.7 billion was created in the first half year, in 3Q no impairments were created, and in 4Q HUF 5.1 billion was released. The main reason for the latter was that on 4 December 2025 around EUR 63 million equivalent Russian bonds matured. Of this amount, EUR 21 million was paid out on the maturity date in Russian roubles, while the authorisation process for the payment of the remaining amount was completed in December. In the period since then, the relevant legal proceedings have been initiated, which – if concluded favourably – are expected to result in the principal repayments being credited to the own accounts of OTP Bank and DSK Bank. Management's expectations regarding the ongoing proceedings related to the principal repayments are positive, as no circumstances have arisen to date that would suggest that the amounts will not be credited to the own accounts of OTP Bank and DSK Bank.

At the end of 2025, the total gross Russian bond portfolio-related exposures at OTP Core and DSK Bank – including the Russian sovereign bond exposures kept in the balance sheet of OTP Core and the claims from the already paid but by the end of last year to own accounts not yet received amount of EUR 21 million or HUF 8 billion equivalent – amounted to HUF 121 billion equivalent, of which HUF 75 billion equivalent not due exposures carried interest. At the end of December 2025, the stock of provisions created for these exposures amounted to HUF 91 billion, resulting in a provision coverage of 74%, down by 6 pps q-o-q.

**Credit quality remained stable**, and the main credit quality indicators continued to show favourable trends. The ratio of Stage 3 loans under IFRS 9 improved by 0.2 pp y-o-y. The own provision coverage of Stage 3 exposures went up by 2.4 pp y-o-y to 61.8%. The Stage 2 ratio showed a remarkable improvement of 3 pps y-o-y.

**Consolidated performing (Stage 1+2) loan growth** reached 15% in 2025, materially surpassing the 9% growth rate achieved in 2024 (FX-adjusted).

At the Group level, performing consumer loans increased by 18% y-o-y on an FX-adjusted basis. As a favourable development, in Uzbekistan a positive turnaround in new cash loan sales has unfolded since June 2025, thus Uzbek consumer loan volumes expanded by 19% y-o-y, whereas Ipoteka Bank's market share in new cash loan flows showed an increase over the quarters of 2025.

As for performing mortgage loans, the y-o-y growth rate reached 19%, while the quarterly growth in the last quarter accelerated to 7%, which was primarily attributable to the Home Start subsidized housing loan scheme in Hungary, available from September 2025. The structure started to exert its positive effect on volume growth from 4Q 2025 due to the time need of the lending process. Mortgage loans at OTP Core jumped by 11% q-o-q in the last quarter.

In 2025 as a whole MSE + corporate loans expanded by 12%, a touch higher than the 11% growth in leasing volumes. While in the preceding period retail loan growth exceeded that in the corporate segment, the last quarter of 2025 painted a more balanced picture: FX-adjusted performing large corporate+MSE credits expanded by 5% q-o-q, matching retail loan growth. In Hungary, this was driven mainly by single large ticket corporate loan disbursements, but corporate loan demand improved in Ukraine, too.

**Consolidated customer deposits** expanded by 11% y-o-y on an FX-adjusted basis. The key driver of growth was household deposits 14% y-o-y growth rates. In Bulgaria the accession to the Eurozone from January 2026 resulted in significant inflows ahead of the joining date at the end of the year, thus retail volumes expanded by 12% q-o-q. Corporate deposits increased by 7% in the course of 2025.

The Group's net loan to deposit ratio stood at 77% at the end of 2025, 3 pps higher than a year before.

In 2025 the volume of **issued securities** decreased by 3%, as in 1Q 2025 a Senior Preferred bond with a nominal value of EUR 650 million was redeemed by OTP Bank; then in 2Q two Senior Non-Preferred series with a total nominal value of EUR 185 million, in 3Q a green Senior Preferred bond worth USD 60 million, and in 4Q a Senior Preferred bond with a notional of RON 170 million was also redeemed by the Bank. Beside these, in June 2025 the Slovenian subsidiary redeemed Senior Preferred bonds worth EUR 400 million, while in October the Uzbek Ipoteka Bank redeemed its senior unsecured bond series in the amount of USD 300 million.

As for new issuances, in June OTP Bank issued green bonds worth CNY 900 million; OTP Mortgage Bank Ltd. issued EUR 500 million covered bond in June and another one in the same size with a value date of 1 October. In May the Slovenian subsidiary issued EUR 300 million Senior Preferred bonds, whereas in October Ipoteka Bank issued two senior unsecured bond series, one in a notional amount of USD 300 million and another one of UZS 1,200 billion.

The subordinated bonds and loans balance sheet line increased by 32% y-o-y: at the end of January 2025, OTP Bank issued Tier 2 bonds worth USD 750 million, while in February it exercised the call option on a previously issued Tier 2 bond with a nominal value of EUR 500 million (of which the liability outside the Group was nearly EUR 230 million at the end of 2024).

**Shareholders' equity** increased by 10% or HUF 506 billion y-o-y. Cumulated net comprehensive income reached HUF 962 billion. In 2Q 2025 the shareholders' equity was reduced by the HUF 270 billion dividend payment to shareholders. Furthermore, the deduction from shareholders' equity due to treasury shares increased by HUF 213 billion y-o-y, mainly attributed to the own shares repurchased in the course of 2025 under single permissions granted by the supervisory authority.

### Consolidated capital adequacy ratios

At the end of 2025, the consolidated Common Equity Tier 1 (CET1) ratio according to IFRS under the prudential scope of consolidation reached 18.1%, marking 0.9 pp decrease against the end of 2024. In the absence of AT1 instruments, this equals to the Tier 1 ratio. The consolidated capital adequacy ratio (CAR) stood at 19.7% at the end of December, underpinning a y-o-y decrease of 0.6 pp.

Capital adequacy ratios were pulled down by 0.9 pp in the wake of the implementation of Basel IV regulation effective from 1 January 2025. In the case of the total capital adequacy ratio (CAR), this was counterbalanced by a total of 0.7 pp as a joint effect of the issuance of Tier 2 bonds in January 2025 in the notional amount of USD 750 million, and the redemption of the Perpetual Tier 2 bond.

At the end of 2025, the effective regulatory minimum requirement for the consolidated Tier 1 capital adequacy ratio (without P2G) was 12.9% which also incorporated the effective SREP rate, whereas the minimum CET1 requirement was 11.0%.

In 2025, consolidated risk weighted assets (RWA) under the prudential scope of consolidation grew by 14% or HUF 3,480 billion to HUF 29,057 billion. Within that, operational risk related RWA went up by 74%, or HUF 1,632 billion, driven by the introduction of the new capital requirement calculation methodology (SMA) according to Basel IV. Credit risk (including counterparty risk) related RWA increased by 8%, or HUF 1,880 billion y-o-y, explained mainly by the implementation of Basel IV (+HUF 33 billion), organic growth effects (+HUF 2,902 billion), the increase in the risk weight of EU sovereign exposures denominated in foreign currencies (+HUF 117 billion), the phasing out of transitional adjustments relating to the introduction of IFRS 9 (-HUF 48 billion), and FX effect (-HUF 1,124 billion).

The consolidated Common Equity Tier 1 (CET1) capital grew by HUF 410 billion y-o-y. The eligible profit for 2025 amounted to HUF 841 billion after dividend deduction. In the actual period, HUF 300 billion dividend was deducted, pursuant to the decision of the Management Committee. The final decision on the dividend amount will be made by the Annual General Meeting, upon the proposal of the Board of Directors.

In the course of 2025, the CET1 capital was reduced by HUF 192 billion as a result of the single permissions received from the National Bank of Hungary for treasury share buybacks: on 24 January 2025 in the amount of HUF 60 billion, whereas on 24 April another HUF 150 billion. The Bank utilized the entire HUF 60 billion amount of the first single permission, whereas in the case of the latter HUF 150 billion permission for buybacks, by 31 December 2025 when the permission expired, HUF 132 million worth of treasury shares were repurchased. The difference between the HUF 150 billion immediately deducted from regulatory capital upon receipt of the single permission and the HUF 132 billion actually spent on share buybacks improved regulatory capital at the end of the year.

As for transitional adjustments taken into account in the CET1 regulatory capital, a total of HUF 64 billion y-o-y decrease was registered: from 1 January 2025 the transitional adjustment relating to the introduction of IFRS 9 can no longer be included in the regulatory capital, reducing CET1 capital by HUF 48 billion. Furthermore, the transitional adjustment relating to the unrealized cumulated revaluation gains/losses since 31 December 2019 of the sovereign bond exposures measured at fair value also moderated (-HUF 16 billion y-o-y effect). The latter transitional adjustment which exerted a HUF 66 billion positive effect on the CET1 capital at the end of 2025, could be taken into account until the end of 2025. Finally, in the course of 2025 FX rate changes reduced the CET1 capital by altogether HUF 193 billion.

**MREL adequacy**

On 31 December 2025 the MREL adequacy ratio of OTP Group reached 25.3%, against the mandatory minimum MREL requirement of 24.1%. Apart from the increasing RWA of the Resolution Group, the 4.8 pps y-o-y decline in the ratio can be explained by the successfully raised MREL-eligible funds as well as redemptions in the actual period.

**Credit rating, shareholder structure**

As of the end of December 2025, the following credit ratings were in effect:

- S&P Global rated OTP Bank's long-term issuer credit at 'BBB', with a negative outlook. This rating, along with the 'BBB' assigned to the bank's Senior Preferred bonds, stands one notch above Hungary's sovereign rating. The subordinated foreign currency debt received a rating of 'BB'. OTP Mortgage Bank Ltd. also held a 'BBB' long-term issuer rating, similarly with a negative outlook.
- Moody's assigned a 'Baa3' rating to OTP Bank's Senior Preferred bonds, while on 30 October 2025 the outlook was changed from negative to stable. At the same time, the dated subordinated foreign currency debt was upgraded to 'Ba1' from 'Ba2'. OTP Mortgage Bank Ltd. holds a 'Baa3' issuer rating, its outlook was again changed from negative to stable on 30 October, while OTP Mortgage Bank Ltd.'s mortgage bonds were rated at 'A1'. OTP Bank's long-term foreign currency deposit rating stood at 'Baa1', with outlook having changed to stable from positive.
- Scope Ratings assigned a 'BBB+' rating to both the Bank's issuer profile and its Senior Preferred bonds. The Senior Non-Preferred bonds were rated 'BBB', and subordinated liabilities 'BB+'. All ratings from Scope carried a stable outlook.
- China Lianhe Credit Rating Co. gave OTP Bank a domestic Chinese long-term issuer rating of 'AAA', with a stable outlook.

Regarding the ownership structure of the Bank, on 31 December 2025 the following investors had more than 5% influence (voting rights) in the Company: MOL Plc. (the Hungarian Oil and Gas Company, 9.04%), Groupama Group (5.37%), and OTP Special Employee Partial Ownership Plan Organizations (Special Employee Partial Ownership Plan Organization No. I. and No. II. of OTP Employees, 5.15% in total).

## POST-BALANCE SHEET EVENTS

Post-balance sheet events cover the period until 28 February 2026.

On 28 February 2026, the United States and Israel carried out coordinated military strikes against Iran, in response to which Iran launched retaliatory missile and drone attacks against Israel and U.S. military facilities along the Persian Gulf. As a result, among other effects, global energy prices and foreign exchange rates became more volatile.

### Hungary

- The Monetary Council, in its decision of 13 January 2026, reduced the reserve requirement from 8% to 6%. The new requirement is to be applied by credit institutions starting from the reserve maintenance period commencing in March 2026.
- OTP Bank Plc. issued notes on 3 February 2026 as value date in the aggregate nominal amount of EUR 500 million. The coupon rate is 3.625% per annum, with a maturity structure of 6NC5. The notes are rated 'BBB' by S&P Global Ratings Europe Limited and 'BBB+' by Scope Ratings GmbH. The notes are listed on the Luxembourg Stock Exchange.
- OTP Mortgage Bank Ltd. on 12 February 2026, it has issued mortgage notes in aggregate nominal amount of EUR 500 million. The notes are rated 'A1' by Moody's Investor Service rating agency, the securities are listed on the Luxembourg Stock Exchange.
- According to the preliminary data published by the Central Statistical Office on 30 January 2026, the performance of the Hungarian economy grew by 0.2% q-o-q in the fourth quarter. Annual growth in 2025 reached 0.4%, 0.3% based on seasonally and calendar-adjusted and balanced data. Average annual inflation in 2025 amounted to 4.4%.
- At its interest rate decision meeting on 24 February 2026, the National Bank of Hungary reduced the policy rate by 25 bps to 6.25%.
- As of 24 February 2026, the United States of America abolished the legally contested "reciprocal" tariffs targeting the European Union and replaced them with a uniform, country neutral 10% temporary *ad valorem* import surcharge for a period of 150 days, while sector specific tariffs (e.g. automotive and steel) remained unchanged. The amendment did not materially affect the tariff rates applied to goods imported from Hungary or the European Union into the United States.

### Bulgaria

- On 1 January 2026, Bulgaria joined the euro area, officially becoming its 21<sup>st</sup> member state.

### Slovenia

- On 27 February 2026, Moody's Ratings upgraded Slovenia's ratings to A2, and changed outlook to stable.

### Serbia

- On 27 February 2026, Moody's Ratings changed Serbia's outlook to stable from positive, and affirmed Ba2 ratings.

### Ukraine

- On 29 January 2026, the National Bank of Ukraine reduced the base rate by 50 bps to 15%.

### Montenegro

- On 27 February 2026, S&P Global Ratings revised its outlook on the long-term foreign and local currency sovereign ratings on Montenegro to positive from stable.

### Russia

- On 13 February 2026, the Russian central bank reduced the base rate by 50 bps to 15.5%.

**CONSOLIDATED PROFIT AFTER TAX BREAKDOWN BY SUBSIDIARIES (IFRS)<sup>4</sup>**

	2024 HUF million	2025 HUF million	Change %/pps
<b>Consolidated profit after tax</b>	<b>1,076,139</b>	<b>1,146,325</b>	<b>7</b>
Adjustments (after tax)	0	0	
<b>Consolidated adjusted profit after tax</b>	<b>1,076,139</b>	<b>1,146,325</b>	<b>7</b>
Banks total <sup>1</sup>	1,001,112	1,073,118	7
OTP Core (Hungary) <sup>2</sup>	270,387	263,975	(2)
DSK Group (Bulgaria) <sup>3</sup>	200,765	211,269	5
OTP Bank Slovenia <sup>4</sup>	113,282	105,833	(7)
OBH (Croatia) <sup>5</sup>	61,743	54,591	(12)
OTP Bank Serbia <sup>6</sup>	66,496	79,324	19
Ipoteka Bank (Uzbekistan)	52,893	49,496	(6)
OTP Bank Ukraine <sup>7</sup>	41,179	55,849	36
CKB Group (Montenegro) <sup>8</sup>	24,194	22,376	(8)
OTP Bank Albania	19,686	18,597	(6)
OTP Bank Moldova	11,492	10,027	(13)
OTP Bank Russia <sup>9</sup>	136,946	201,783	47
OTP Bank Romania <sup>10</sup>	2,050		
Leasing	10,842	4,404	(59)
Merkantil Group (Hungary) <sup>11</sup>	10,842	4,404	(59)
Asset Management	24,747	24,422	(1)
OTP Asset Management (Hungary)	24,624	24,310	(1)
Foreign Asset Management Companies <sup>12</sup>	123	112	(9)
Other Hungarian Subsidiaries	24,369	27,418	13
Other Foreign Subsidiaries <sup>13</sup>	(939)	(4,637)	394
Eliminations	16,009	21,599	
Adjusted profit after tax of the Hungarian operation <sup>14</sup>	340,617	333,033	(2)
Adjusted profit after tax of the Foreign operation <sup>15</sup>	735,523	813,291	11
Share of Hungarian contribution to the adjusted profit after tax	32%	29%	(3)
Share of Foreign contribution to the adjusted profit after tax	68%	71%	3

<sup>4</sup> Belonging footnotes are in the Supplementary data section of the Report.

## CONSOLIDATED STATEMENT OF RECOGNIZED INCOME

Main components of the adjusted Statement of recognized income	2024	2025	Change %
	HUF million	HUF million	
<b>Consolidated profit after tax</b>	<b>1,076,139</b>	<b>1,146,325</b>	<b>7</b>
Adjustments (after tax)	0	0	
Consolidated adjusted profit after tax	1,076,139	1,146,325	7
Profit before tax	1,386,883	1,502,776	8
Operating profit	1,545,377	1,700,173	10
Total income	2,633,908	2,916,962	11
Net interest income	1,782,604	1,944,625	9
Net fees and commissions	545,631	604,324	11
Other net non-interest income	305,673	368,013	20
Foreign exchange result, net	163,475	262,565	61
Gain/loss on securities, net	12,410	42,180	240
Net other non-interest result	129,788	63,269	(51)
Operating expenses	(1,088,531)	(1,216,789)	12
Personnel expenses	(564,374)	(630,275)	12
Depreciation	(118,628)	(134,716)	14
Other expenses	(405,529)	(451,798)	11
Total risk costs	(158,494)	(197,396)	25
Provision for impairment on loan losses	(89,864)	(168,788)	88
Other provision	(68,631)	(28,609)	(58)
Corporate taxes <sup>2</sup>	(310,743)	(356,452)	15
<b>Performance Indicators</b>			
	<b>2024</b>	<b>2025</b>	<b>%/pps</b>
ROE (from profit after tax)	23.5%	21.6%	(1.8)
ROE (from adjusted profit after tax)	23.5%	21.6%	(1.8)
ROA (from profit after tax)	2.6%	2.6%	0.0
ROA (from adjusted profit after tax)	2.6%	2.6%	0.0
Operating profit margin	3.71%	3.80%	0.09
Total income margin	6.32%	6.52%	0.20
Net interest margin	4.28%	4.34%	0.07
Net fee and commission margin	1.31%	1.35%	0.04
Net other non-interest income margin	0.73%	0.82%	0.09
Cost-to-asset ratio	2.61%	2.72%	0.11
Cost/income ratio	41.3%	41.7%	0.4
Provision for impairment on loan losses-to-average gross loans ratio	0.38%	0.66%	0.28
Total risk cost-to-asset ratio	0.38%	0.44%	0.06
Effective tax rate	22.4%	23.7%	1.3
Non-interest income/total income	32%	33%	1
EPS base (HUF) (from profit after tax)	4,052	4,435	9
EPS diluted (HUF) (from profit after tax)	4,050	4,434	9
EPS base (HUF) (from adjusted profit after tax)	4,068	4,457	10
EPS diluted (HUF) (from adjusted profit after tax)	4,066	4,456	10
<b>Comprehensive Income Statement</b>			
	<b>2024</b>	<b>2025</b>	<b>%</b>
Consolidated profit after tax	1,076,140	1,146,325	7
Fair value changes of financial instruments measured at fair value through other comprehensive income	47,751	7,123	(85)
Net investment hedge in foreign operations	(27,310)	24,690	
Foreign currency translation difference	195,152	(215,803)	
Change of actuarial costs (IAS 19)	(923)	(299)	(68)
<b>Net comprehensive income</b>	<b>1,290,810</b>	<b>962,036</b>	<b>(25)</b>
o/w Net comprehensive income attributable to equity holders	1,286,097	956,252	(26)
Net comprehensive income attributable to non-controlling interest	4,713	5,784	23
<b>Average exchange rate<sup>1</sup> of the HUF</b>			
	<b>2024</b>	<b>2025</b>	<b>Change</b>
	<b>HUF</b>	<b>HUF</b>	<b>%</b>
HUF/EUR	395	398	1
HUF/CHF	415	425	2
HUF/USD	365	353	(3)

<sup>1</sup> Exchange rates presented in the tables of this report should be interpreted as follows: the value of a unit of the other currency expressed in Hungarian forint terms, i.e. HUF/EUR represents the HUF equivalent of one EUR.

## ASSET-LIABILITY MANAGEMENT

### *Similar to previous periods OTP Group maintained a strong and safe liquidity position...*

The primary objective of OTP Bank in terms of asset-liability management has not changed, that is to ensure that the Group's liquidity is maintained at a safe level.

Refinancing sources of the European Central Bank are available for OTP (ECB repo eligible securities portfolio on Group level exceeded EUR 9.5 billion).

Total liquidity reserves of OTP Bank remained steadily and substantially above the safety level. As of 31 December 2025, the gross liquidity buffer was around EUR 11.1 billion equivalent. The level of these buffers is significantly higher than the maturing debt within one year and the reserves required to manage possible liquidity shocks.

As of 31 December 2025, OTP Group's consolidated liquidity coverage (LCR) ratio was 251%, while NSFR compliance has remained comfortable (4Q 2025: 151%).

The periodic changes in the issued securities, as well as in the subordinated and loans balance sheet line, are presented in the executive summary section.

### *...and kept its interest-rate risk exposures low*

The Bank has an interest-rate risk exposure resulting from its business operations, particularly stemming from the liabilities which respond to yield changes only to a moderate extent. The Bank considers the reduction of interest rate risk and closing of this exposure as a strategic matter.

The HUF interest rate risk sensitivity slightly increased from basically closed levels in previous year but remained moderate in 2025. The sensitivity of HUF net interest income to 1%-point interest rate decline is approximately -HUF 19 billion. The upcoming maturities of the long-term HUF liquid asset portfolio and the operating profit generation would cause the variable rate asset surplus to increase over time, which is mitigated by the purchase of long term, fixed rate securities and contracting fixed receiver interest rate swaps.

In case of EUR and (till the end of 2025) BGN denominated volumes the Group has relatively higher variable rate asset surplus compared to the HUF position, thus an open interest rate risk position. The impact of 1%-point change in EUR interest rates on EUR net interest income is approximately EUR 130 million, which is practically symmetric in the case of upward and downward rate changes. The Group continued to purchase fixed rate EUR (and BGN) assets in 2025 to hedge the Group's net interest income from the negative effects of decreasing EUR yields.

### *Market Risk Exposure of OTP Group*

The consolidated capital requirement of the trading book positions, the counterparty risk and the FX risk exposure represented HUF 51.4 billion in total.

OTP Group is an active participant of the international FX and derivative market. Open FX positions of group members are restricted to individual and global net open position limits (overnight and intraday), and to stop-loss limits. The open positions of the group members outside Hungary except for the Bulgarian DSK Bank – the EUR/BGN exposure of DSK under the exchange rate regime before the eurozone accession did not represent real risk – were negligible measured against either the balance sheet total or the regulatory capital. Therefore, the group level FX exposure was concentrated at OTP Bank.

In order to mitigate the FX rate sensitivity of the consolidated shareholders' equity, OTP Bank Plc. has opened a short euro open FX position; the revaluation result of which is recognized directly against equity.

## CONSOLIDATED STATEMENT OF FINANCIAL POSITION OF OTP GROUP

Main components of the balance sheet	2024	2025	Change %	
	HUF million	HUF million		
<b>TOTAL ASSETS</b>	<b>43,419,128</b>	<b>45,427,144</b>	<b>5</b>	
Cash, amounts due from Banks and balances with the National Banks	6,079,032	4,965,634	(18)	
Placements with other banks, net of allowance for placement losses	1,891,901	1,991,490	5	
Securities at fair value through profit or loss	744,104	425,213	(43)	
Securities at fair value through other comprehensive income	1,705,554	2,046,413	20	
Net customer loans	23,361,638	25,829,350	11	
Net customer loans (FX-adjusted <sup>1</sup> )	22,406,860	25,829,350	15	
Gross customer loans	24,334,694	26,863,462	10	
Gross customer loans (FX-adjusted <sup>1</sup> )	23,343,126	26,863,462	15	
<b>Gross performing (Stage 1+2) customer loans (FX-adjusted<sup>1</sup>)</b>	<b>22,500,636</b>	<b>25,926,969</b>	<b>15</b>	
o/w Retail loans	13,074,004	15,400,708	18	
Retail mortgage loans (incl. home equity)	6,203,646	7,361,426	19	
Retail consumer loans	5,983,684	7,044,959	18	
SME loans	886,674	994,323	12	
Corporate loans	7,852,542	8,786,880	12	
Leasing	1,574,090	1,739,381	11	
Allowances for loan losses	(973,056)	(1,034,112)	6	
Allowances for loan losses (FX-adjusted <sup>1</sup> )	(936,266)	(1,034,112)	10	
Associates and other investments	124,524	160,418	29	
Securities at amortized costs	7,447,741	7,925,465	6	
Tangible and intangible assets, net	985,886	1,033,988	5	
o/w Goodwill, net	71,308	68,169	(4)	
Tangible and other intangible assets, net	914,578	965,818	6	
Other assets	1,078,749	1,049,173	(3)	
<b>TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY</b>	<b>43,419,128</b>	<b>45,427,144</b>	<b>5</b>	
Amounts due to banks, the National Governments, deposits from the National Banks and other banks, and Financial liabilities designated at fair value through profit or loss	2,094,681	1,581,260	(25)	
Deposits from customers	31,666,399	33,734,266	7	
<b>Deposits from customers (FX-adjusted<sup>1</sup>)</b>	<b>30,383,499</b>	<b>33,734,266</b>	<b>11</b>	
o/w Retail deposits	20,456,676	23,142,031	13	
Household deposits	17,169,830	19,608,073	14	
SME deposits	3,286,846	3,533,958	8	
Corporate deposits	9,926,823	10,592,235	7	
Liabilities from issued securities	2,593,124	2,512,636	(3)	
Other liabilities	1,575,553	1,487,281	(6)	
Subordinated bonds and loans	369,359	486,084	32	
<b>Total shareholders' equity</b>	<b>5,120,012</b>	<b>5,625,616</b>	<b>10</b>	
	Indicators	2024	2025	%/pps
Loan/deposit ratio (FX-adjusted <sup>1</sup> )		77%	80%	3
Net loan/deposit ratio (FX-adjusted)		74%	77%	3
Stage 1 loan volume under IFRS 9		20,279,860	23,246,910	15
Stage 1 loans under IFRS 9/gross customer loans		83.3%	86.5%	3.2
Own coverage of Stage 1 loans under IFRS 9		0.8%	0.8%	0.1
Stage 2 loan volume under IFRS 9		3,167,854	2,680,060	(15)
Stage 2 loans under IFRS 9/gross customer loans		13.0%	10.0%	(3.0)
Own coverage of Stage 2 loans under IFRS 9		9.2%	9.9%	0.7
Stage 3 loan volume under IFRS 9		886,981	936,493	6
Stage 3 loans under IFRS 9/gross customer loans		3.6%	3.5%	(0.2)
Own coverage of Stage 3 loans under IFRS 9		59.5%	61.8%	2.4
	Consolidated capital adequacy - Basel3, IFRS, according to prudential scope of consolidation	2024	2025	%/pps
Capital adequacy ratio		20.3%	19.7%	(0.6)
Tier 1 ratio		18.9%	18.1%	(0.9)
Common Equity Tier 1 ('CET1') capital ratio		18.9%	18.1%	(0.9)
Own funds		5,200,375	5,725,502	10
o/w Tier 1 Capital		4,842,978	5,253,292	8
o/w Common Equity Tier 1 capital		4,842,978	5,253,292	8
Tier 2 Capital		357,397	472,210	32
Consolidated risk weighted assets (RWA) (credit, market, and operational risk)		25,576,776	29,057,123	14
o/w RWA - Credit risk RWA		22,988,686	24,869,051	8
RWA - Market & Operational risk		2,588,090	4,188,072	62
	Closing exchange rate of the HUF	2024	2025	Change %
HUF/EUR		410	385	(6)
HUF/CHF		435	414	(5)
HUF/USD		394	328	(17)

<sup>1</sup> For the FX-adjustment, the closing cross currency rates for the current period were used in order to calculate the HUF equivalent of loan and deposit volumes in the base periods.

**OTP BANK'S HUNGARIAN CORE BUSINESS****OTP Core Statement of recognized income:**

Main components of P&L account	2024 HUF million	2025 HUF million	Change %
Profit after tax	806,827	681,344	(16)
Dividend received from subsidiaries	424,380	417,369	(2)
Profit after tax without received dividend	382,447	263,975	(31)
Adjustments (without dividend received from subsidiaries, after tax)	112,060	0	
<b>Adjusted profit after tax</b>	<b>270,387</b>	<b>263,975</b>	<b>(2)</b>
Profit before tax	374,636	408,620	9
Operating profit	425,303	457,408	8
Total income	868,382	975,327	12
Net interest income	578,001	654,815	13
Net fees and commissions	219,505	247,158	13
Other net non-interest income	70,876	73,355	3
Operating expenses	(443,078)	(517,920)	17
Total risk costs	(50,667)	(48,788)	(4)
Provision for impairment on loan losses	(994)	(6,658)	570
Other provisions	(49,673)	(42,129)	(15)
Corporate income tax	(104,250)	(144,645)	39
Indicators	2024	2025	pps
ROE (adjusted)	9.6%	8.5%	(1.2)
ROA (adjusted)	1.3%	1.3%	(0.1)
Operating profit margin	2.12%	2.20%	0.09
Total income margin	4.32%	4.70%	0.37
Net interest margin	2.88%	3.15%	0.28
Net fee and commission margin	1.09%	1.19%	0.10
Net other non-interest income margin	0.35%	0.35%	0.00
Operating costs to total assets ratio	2.2%	2.5%	0.3
Cost/income ratio	51.0%	53.1%	2.1
Provision for impairment on loan losses / average gross loans <sup>1</sup>	0.01%	0.09%	0.08
Effective tax rate	27.8%	35.4%	7.6

<sup>1</sup> A negative *Provision for impairment on loan and placement losses/average gross loans* ratio implies a positive amount of provision for impairment on loan and placement losses.

## Main components of OTP Core's Statement of financial position:

Main components of balance sheet (closing balances)		2024	2025	Change
		HUF million	HUF million	%
Total Assets		19,288,046	20,049,496	4
Financial assets <sup>1</sup> (net)		9,813,107	9,521,816	(3)
Net customer loans		6,812,154	7,836,334	15
Net customer loans (FX-adjusted)		6,722,846	7,836,334	17
Gross customer loans		7,077,532	8,095,510	14
Gross customer loans (FX-adjusted)		6,985,079	8,095,510	16
<b>Stage 1+2 customer loans (FX-adjusted)</b>		<b>6,712,787</b>	<b>7,826,823</b>	<b>17</b>
Retail loans		4,126,847	4,779,808	16
Retail mortgage loans (incl. home equity)		1,939,259	2,343,436	21
Retail consumer loans		1,667,697	1,851,441	11
SME loans		519,892	584,931	13
Corporate loans		2,585,939	3,047,015	18
Provisions		(265,378)	(259,176)	(2)
Provisions (FX-adjusted)		(262,233)	(259,176)	(1)
Tangible and intangible assets (net)		403,473	470,679	17
Shares and equity investments (net)		1,995,219	2,023,310	1
Other assets (net)		264,094	197,356	(25)
Deposits from customers		10,913,995	11,453,532	5
<b>Deposits from customers (FX-adjusted)</b>		<b>10,739,871</b>	<b>11,453,532</b>	<b>7</b>
Retail deposits		6,702,333	7,335,636	9
Household deposits		5,235,374	5,781,003	10
SME deposits		1,466,959	1,554,633	6
Corporate deposits		4,037,504	4,117,812	2
Liabilities to credit institutions		1,903,955	1,969,564	3
Issued securities		2,397,615	2,261,368	(6)
Subordinated bonds and loans		347,117	460,614	33
Total shareholders' equity		3,053,832	3,265,229	7
<b>Loan Quality</b>		<b>2024</b>	<b>2025</b>	<b>%/pps</b>
Stage 1 loan volume under IFRS 9 (in HUF million)		5,799,286	6,916,981	19
Stage 1 loans under IFRS 9/gross customer loans		81.9%	85.4%	3.5
Own coverage of Stage 1 loans under IFRS 9		0.5%	0.5%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)		1,002,107	909,842	(9)
Stage 2 loans under IFRS 9/gross customer loans		14.2%	11.2%	(2.9)
Own coverage of Stage 2 loans under IFRS 9		7.3%	7.9%	0.6
Stage 3 loan volume under IFRS 9 (in HUF million)		276,139	268,686	(3)
Stage 3 loans under IFRS 9/gross customer loans		3.9%	3.3%	(0.6)
Own coverage of Stage 3 loans under IFRS 9		58.2%	57.1%	(1.2)
<b>Market Share</b>		<b>2024</b>	<b>2025</b>	<b>pps</b>
Loans		26.6%	27.7%	1.1
Deposits		27.1%	27.4%	0.3
Total Assets		28.1%	28.3%	0.2
<b>Performance Indicators</b>		<b>2024</b>	<b>2025</b>	<b>pps</b>
Net loans to deposits (FX-adjusted)		63%	68%	6
Shareholder's Equity/Total Assets (closing)		15.8%	16.3%	0.5
Total Assets/Shareholder's Equity (closing)		6.3x	6.1x	(0.2x)
Capital adequacy ratio (OTP Bank, non-consolidated, IFRS)		29.3%	25.1%	(4.2)
Common Equity Tier1 ratio (OTP Bank, non-consolidated, IFRS)		25.8%	21.4%	(4.4)

<sup>1</sup> Cash, amounts due from banks and balances with the National Bank of Hungary; placements with other banks; repo receivables; securities and other financial assets.

**Despite unfavourable regulatory changes and rising tax burden, OTP Core managed to maintain stable profitability in 2025. Driven by the Home Start program, mortgage lending growth accelerated to over 20%, while in the second half of the year demand for large corporate loans also improved. As a result, the performing loan portfolio expanded by 17%, a rate not seen for years. Based on its high-quality and continuously developed services, the Bank's market shares continued their trend-like increase across most product segments.**

In 2025, **OTP Core** generated HUF 264.0 billion adjusted profit after tax, which was 2% (HUF 6.4 billion) lower than the figure recorded a year earlier. Compared to the base year, results were burdened by HUF 47.2 billion higher windfall tax, while profit before tax increased by 9% y-o-y.

The full-year amount of the special tax on financial institutions and the windfall tax, presented on the corporate income tax line, totalled gross HUF 137.5 billion in the case of OTP Core. This sum was accounted for in a lump sum in 1Q. In each month, one-twelfth of the annual amount of the tax-reducing item was accounted for in the total amount of HUF 52.3 billion in 2025.

In a favourable development, the 9% y-o-y increase in profit before tax was driven by the 8% improvement in operating profit: both net interest income as well as fee and commission income grew at a double-digit pace, while the fair value adjustment recognized on subsidized loans declined by HUF 32.2 billion y-o-y. Total risk costs remained broadly unchanged.

Net interest income increased by 13% y-o-y, primarily supported by a 28 bps y-o-y improvement in the net interest margin, mainly driven by continued growth in retail deposits. In addition, loan portfolio expansion and the reinvestment of maturing Hungarian government bonds in a higher yield environment also had a positive impact on net interest income.

Net fees and commissions increased by 13% or HUF 27.7 billion y-o-y. A major part of the growth stemmed from securities commissions propelled by the reallocation of retail savings, while the strengthening commission income from deposits, transactions and cards was largely offset by the HUF 40.2 billion y-o-y increase in financial transaction tax expenses, owing to the hike in financial transaction tax rate from August 2024, and to the new FX conversion levy introduced in October 2024. The HUF 8.1 billion positive contribution of commission income generated by the SZÉP card business, which was included into the OTP Core segment from 2025, was neutralized by the reclassification of an expense item from operating costs to commission expenses, starting from January.

Although OTP Bank implemented in its account fees the inflation indexation as well as the higher other operating cost effect starting from March 2025, the pre-increase retail fees have been immediately restored in accordance with the agreement of the Hungarian Banking Association and the Ministry of National Economy of 9 April 2025 and will be maintained until 30 June 2026.

In 2025, other net non-interest income amounted to HUF 73.4 billion, exceeding the previous year's level by 3%. Results were negatively affected by the HUF 32.2 billion y-o-y decline in the fair value adjustment of subsidized retail loans (baby loan, CSOK, Home Start, and workers' loan).

Operating expenses increased by 17% y-o-y. This growth was significantly driven by a HUF 20 billion one-off donation provided for the renovation of the Royal Palace of Gödöllő; excluding this item, operating costs would have risen by 12%, primarily reflecting wage inflation as well as higher depreciation stemming from IT investments and branch rationalisation. The number of branches declined from 317 at year-end 2024 to 301 by the end of 2025, while maintaining a consistently high standard of in-branch customer service. The closing headcount of OTP Core increased by 3% y-o-y. The cost-to-income ratio rose y-o-y by 2.1 pps to 53.1%.

In 2025, total risk costs amounted to HUF 48.8 billion, almost the same as the level recorded in the previous year. Credit risk costs reached HUF 6.7 billion, resulting in 9 bps credit risk cost ratio. Credit risk costs include HUF 8.6 billion recognized in two separate instances in connection with the extension of the interest rate cap, as well as provisions set aside in association with the expected negative effects of US tariffs. Other risk costs totalled HUF 42.1 billion for the year, including HUF 7.0 billion of impairment recognised on Russian government bonds held in the Bank's books. In addition, the revaluation of investments in subsidiaries generated HUF 44.5 billion impairment, of which HUF 30.8 billion was recognised in 4Q. At Group level, the revaluation of subsidiary investments is eliminated, only the related positive tax effect is reflected in OTP Group's P&L.

Credit quality trends remained favourable. The Stage 3 ratio declined by 0.6 pp y-o-y, to 3.3%. The Stage 2 ratio also improved significantly, falling by 3.8 pps y-o-y. The coverage of Stage 3 loans stood at 57.1% at year-end.

As for the balance sheet, total assets increased by 4% y-o-y, primarily driven by the growth in customer deposits, particularly retail deposits, as well as the increase in shareholders' equity. The y-o-y growth in total shareholders' equity stemmed from the profit generated in Hungary in the reporting period (without dividends received), as the dividend paid by the Bank to shareholders as well as the amount spent on share buybacks in the reporting period roughly equalled the amount of dividend OTP Core received from subsidiaries. The increase on the liabilities side was reflected on the asset side mainly through the expansion of customer loans.

The expansion of the performing (Stage 1+2) loan portfolio accelerated in the fourth quarter, increasing by 8% q-o-q (FX-adjusted). Both the retail (+7%) and corporate (+10%) segments contributed to the q-o-q growth. As a result, the annual growth rate of performing loans accelerated to 17%.

As for the retail segment, the quarterly growth of performing mortgage loans was particularly strong in 4Q, reaching 11%, which lifted annual growth to 21%. At OTP, the volume of newly originated market-based housing loans increased by 57% y-o-y, while the contractual volume of subsidised housing loans surged to two and a half times the previous year's level, propelled by the Home Start subsidised housing loan programme launched on 1 September 2025. Under the programme, the Bank accepted housing loan applications totalling HUF 295 billion by year-end 2025, of which contracts in an amount of HUF 251 billion were signed, corresponding to a market share of nearly 43%.

Consumer loan volumes increased by 11% in 2025, primarily driven by cash loans and the Worker's Loan Program, launched at the beginning of 2025. The cash loan book rose by 15% during the year, while the volume of new contracts exceeded the base year's level by 36%. In 2025, nearly HUF 71 billion worker's loans were disbursed to close to 20,000 customers, with an average loan size of HUF 3.8 million. As a result, OTP's stock market share in outstanding worker's loans was nearly 45% by year-end 2025. Demand for worker's loans showed a declining trend within the year. The outstanding volume of baby loan products increased by 1% y-o-y, reflecting the moderating demand compared to the base period.

While corporate lending remained broadly flat in the first half of the year, the volume of corporate loans increased significantly in the second half, primarily driven by several large transactions. As a result, q-o-q growth accelerated from 3% in the third quarter to 10% in 4Q, lifting full-year growth to 17%. OTP's market share in loans to non-financial Hungarian corporations increased by 1.5 pps y-o-y to a multiyear high of 21.0%.

Within corporate lending, loans to micro- and small-sized enterprises expanded by 13% y-o-y, driven by subsidized loans: The Széchenyi Card MAX+ loan program generated HUF 433 billion new placement in 2025, representing a 17% increase compared to the previous year. As a result, the Bank's stock market share reached 41% under the programme by year-end. Under the Demján Sándor Programme, launched at the beginning of 2025, loan agreements amounting to HUF 93.4 billion were signed during the year, of which HUF 43.3 billion had been drawn down by year-end.

On 22 December 2025, OTP Bank Plc., as a financial investor, made an equity investment of USD 30 million into U Holdings SARL, the holding company of Paraguay's UENO Bank based in Luxembourg, as part of its capital increase.

Customer deposits increased by 7% in 2025 (FX-adjusted), driven by a 10% expansion in retail deposits, while corporate (including MSE) deposits grew by 3%. The corporate portfolio was negatively affected by the introduction of decentralised account management for local governments at the Hungarian State Treasury, effective from 1 October.

Although the outstanding volume of issued securities declined by 6% y-o-y. OTP Core remained active on international capital markets, as illustrated by the recent successful transactions. In 2025, international bonds and mortgage bonds were issued in a total amount of EUR 1,107 million equivalent. Over the same period, EUR 1,306 million equivalent securities were redeemed.

The stock of subordinated bonds and loans increased by 33% y-o-y. In 2025, EUR 720 million equivalent Tier 2 bonds were issued, alongside the call of EUR 500 million outstanding instruments.

**OTP FUND MANAGEMENT (HUNGARY)****Changes in assets under management and financial performance of OTP Fund Management:**

Main components of P&L account	2024 HUF million	2025 HUF million	Change %
Profit after tax	24,624	24,310	(1)
Adjustments (after tax)	0	0	
Adjusted profit after tax	24,624	24,310	(1)
Income tax	(2,578)	(2,342)	(9)
Profit before income tax	27,202	26,652	(2)
Operating profit	27,138	26,655	(2)
Total income	32,753	33,466	2
Net fees and commissions	30,321	32,170	6
Other net non-interest income	2,389	1,235	(48)
Operating expenses	(5,615)	(6,811)	21
Total provisions	64	(3)	
Main components of balance sheet (closing balances)	2024	2025	%
Total assets	43,750	48,768	11
Total shareholders' equity	29,409	37,559	28
Asset under management	2024 HUF billion	2025 HUF billion	%
<b>Assets under management, total (w/o duplicates)<sup>1</sup></b>	<b>4,071</b>	<b>4,665</b>	<b>15</b>
Volume of investment funds (closing, w/o duplicates)	3,507	4,042	15
Volume of managed assets (closing)	563	623	11
<b>Volume of investment funds (closing, with duplicates)<sup>2</sup></b>	<b>4,648</b>	<b>5,276</b>	<b>14</b>
bond	2,556	2,826	11
mixed	637	755	18
equity	499	674	35
absolute return	507	597	18
money market	340	278	(18)
commodity market	91	74	(18)
guaranteed	19	71	281

<sup>1</sup> The cumulative net asset value of investment funds and managed assets of OTP Fund Management, eliminating the volume of own investment funds (duplications) being managed in other investment funds and managed assets of OTP Fund Management.

<sup>2</sup> The cumulative net asset value of investment funds with duplications managed by OTP Fund Management.

**OTP Fund Management ended another successful year in 2025, when it won prestigious professional awards, and saw a steady and unbroken growth in the funds managed. By the end of 2025, its share on the securities fund markets increased to 30.3%, up from 23.6% at the end of 2015.**

In 2025, **OTP Fund Management** generated HUF 24.3 billion profit.

In 2025, net fee and commission income rose by 6%, in accordance with the dynamic growth of assets under management. The average annual rate of the fund management fee (1.08% in 2025) was 3 bps lower than in the previous year. The HUF 3.6 billion success fee earned in 4Q of 2025 for funds generating above-benchmark yields resulted in a 33% y-o-y increase.

In 2025, the 48% y-o-y drop in other income primarily stemmed from the negative result on securities held in the Company's own books and measured at fair value, and from FX losses.

Full-year operating expenses were 21% higher than in the previous year. The 20% growth in personnel costs predominantly stemmed from higher bonus payments in 4Q, mostly relating to funds' performance, but raising base salaries and increasing the number of employees also played a role. The 13% increase in other expenses was largely caused by higher IT costs.

In Hungary's fund management market, the wealth of investment funds once again hit record high at the end of December 2025, with 16% y-o-y growth. On the market, the wealth of absolute return funds has grown outstandingly, by more than HUF 1,000 billion.

The volume of funds managed by OTP Fund Management exceeded HUF 5,200 billion (+14% y-o-y) at the end of December; thus, the Company remained the market leader (30.3%) in the securities fund market. In the case of OTP Fund Management, the wealth of bond funds has expanded by 11% y-o-y, surpassing HUF 2,800 billion, thus accounting for more than half of managed funds' volumes at the end of the year. As to other categories, mixed funds, currently the second largest category, rallied (+18% y-o-y), and equity funds also marched higher (+35% y-o-y), benefiting from the effect of positive yields and capital inflow, while money market funds experienced capital outflow.

**MERKANTIL GROUP (HUNGARY)****Performance of Merkantil Group:**

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		10,842	4,404	(59)
Adjustments (after tax)		0	0	
Adjusted profit after tax		10,842	4,404	(59)
Income tax		(3,728)	(4,072)	9
Profit before income tax		14,569	8,476	(42)
Operating profit		12,098	12,940	7
Total income		27,541	28,898	5
Net interest income		24,052	25,656	7
Net fees and commissions		669	569	(15)
Other net non-interest income		2,819	2,673	(5)
Operating expenses		(15,443)	(15,958)	3
Total provisions		2,471	(4,464)	
Provision for impairment on loan losses		2,494	(2,616)	
Other provision		(23)	(1,848)	
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		1,009,625	841,801	(17)
Gross customer loans		674,058	731,482	9
Gross customer loans (FX-adjusted)		669,935	731,482	9
Stage 1+2 customer loans (FX-adjusted)		656,796	720,775	10
Corporate loans		57,654	58,604	2
Leasing		599,142	662,172	11
Allowances for possible loan losses		(9,896)	(10,403)	5
Deposits from customers		5,884	5,349	(9)
Liabilities to credit institutions		900,713	719,963	(20)
Subordinated debt		6,031	10,019	66
Total shareholders' equity		66,604	76,659	15
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		612,507	659,721	8
Stage 1 loans under IFRS 9/gross customer loans		90.9%	90.2%	(0.7)
Own coverage of Stage 1 loans under IFRS 9		0.4%	0.4%	0.0
Stage 2 loan volume under IFRS 9 (in HUF million)		48,309	61,055	26
Stage 2 loans under IFRS 9/gross customer loans		7.2%	8.3%	1.2
Own coverage of Stage 2 loans under IFRS 9		4.5%	4.0%	(0.6)
Stage 3 loan volume under IFRS 9 (in HUF million)		13,241	10,706	(19)
Stage 3 loans under IFRS 9/gross customer loans		2.0%	1.5%	(0.5)
Own coverage of Stage 3 loans under IFRS 9		40.2%	48.0%	7.8
Provision for impairment on loan losses/average gross loans		(0.40%)	0.38%	0.78
Performance Indicators		2024	2025	pps
ROA		1.1%	0.5%	(0.6)
ROE		17.9%	6.2%	(11.7)
Total income margin		2.87%	3.28%	0.41
Net interest margin		2.51%	2.91%	0.40
Operating costs / Average assets		1.6%	1.8%	0.2
Cost/income ratio		56.1%	55.2%	(0.9)

In full year 2025 **Merkantil Group** posted HUF 4.4 billion adjusted profit after tax, which brought its ROE to 6.2%. The 59% drop in profit after tax in 2025 stemmed mostly from elevated risk costs, but it was also adversely affected by the fact that, unlike in the previous year, Merkantil Bank did not leverage the opportunity to reduce its extra profit tax in the reporting period.

Full-year operating profit grew by 7%, as the 5% gain in income was accompanied by only 3% higher costs. Annual net interest income increased by 7%. Reasons include the 40 bps improvement in net interest margin as well as a 10% expansion in the performing loan book (primarily driven by vehicle financing). In 2025, operating expenses rose by 3% on the back of increasing personnel and IT expenses.

In 2025, total risk costs amounted to HUF 4.5 billion, compared to a positive HUF 2.5 billion in the base period.

The ratio of Stage 3 loans dropped by 0.5 pp y-o-y, to 1.5%, while their coverage increased by 7.8 pps y-o-y. FX-adjusted performing (Stage 1+2) loans expanded by 10% y-o-y, including an 11% increase in leasing exposures, while corporate loans rose by 2%. In 2025, the volume of newly extended loans surged by 13% y-o-y, including a 20% increase in new car loan placements.

Credit growth benefited from the subsidized loan facilities: under the KAVOSZ Széchenyi Card programme, customers have concluded subsidized loan agreements totalling HUF 231 billion with Merkantil Bank, since the beginning of the programme. Starting from 2025, Merkantil Bank also offers preferential interest rate schemes under the Demján Sándor Programme: customers have signed a total of HUF 21 billion worth of agreements for these subsidized loans.

## IFRS REPORTS OF THE MAIN FOREIGN SUBSIDIARIES OF OTP BANK

## DSK GROUP (BULGARIA)

## Performance of DSK Group:

Main components of P&L account	2024 HUF million	2025 HUF million	Change %
Profit after tax	200,765	211,269	5
Adjustments (after tax)	0	0	
Adjusted profit after tax	200,765	211,269	5
Income tax	(33,392)	(34,763)	4
Profit before income tax	234,156	246,032	5
Operating profit	255,204	263,095	3
Total income	375,365	396,069	6
Net interest income	267,411	276,402	3
Net fees and commissions	83,724	94,067	12
Other net non-interest income	24,230	25,600	6
Operating expenses	(120,160)	(132,973)	11
Total provisions	(21,048)	(17,063)	(19)
Provision for impairment on loan losses	(18,015)	(17,259)	(4)
Other provision	(3,033)	196	
Main components of balance sheet (closing balances)	2024	2025	%
Total assets	7,674,660	8,507,136	11
Gross customer loans	4,809,808	5,313,633	10
Gross customer loans (FX-adjusted)	4,518,789	5,313,633	18
Stage 1+2 customer loans (FX-adjusted)	4,422,547	5,212,564	18
Retail loans	2,781,312	3,366,184	21
Retail mortgage loans	1,487,494	1,940,853	30
Retail consumer loans	1,199,846	1,332,221	11
MSE loans	93,973	93,110	(1)
Corporate loans	1,294,013	1,457,485	13
Leasing	347,221	388,895	12
Allowances for possible loan losses	(142,807)	(131,458)	(8)
Allowances for possible loan losses (FX-adjusted)	(134,131)	(131,458)	(2)
Deposits from customers	6,132,661	6,944,798	13
Deposits from customers (FX-adjusted)	5,736,644	6,944,798	21
Retail deposits	4,918,051	5,963,853	21
Retail deposits	4,407,689	5,389,275	22
MSE deposits	510,362	574,578	13
Corporate deposits	818,593	980,946	20
Liabilities to credit institutions	318,710	297,002	(7)
Subordinated debt	94,318	88,637	(6)
Total shareholders' equity	1,051,427	1,100,261	5
Loan Quality	2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)	4,087,398	4,661,437	14
Stage 1 loans under IFRS 9/gross customer loans	85.0%	87.7%	2.7
Own coverage of Stage 1 loans under IFRS 9	0.5%	0.5%	0.0
Stage 2 loan volume under IFRS 9 (in HUF million)	619,996	551,128	(11)
Stage 2 loans under IFRS 9/gross customer loans	12.9%	10.4%	(2.5)
Own coverage of Stage 2 loans under IFRS 9	10.0%	9.1%	(0.9)
Stage 3 loan volume under IFRS 9 (in HUF million)	102,413	101,068	(1)
Stage 3 loans under IFRS 9/gross customer loans	2.1%	1.9%	(0.2)
Own coverage of Stage 3 loans under IFRS 9	58.0%	58.3%	0.3
Provision for impairment on loan losses/average gross loans	0.40%	0.35%	(0.06)
Performance Indicators	2024	2025	pps
ROA	2.9%	2.7%	(0.2)
ROE	21.5%	20.3%	(1.3)
Total income margin	5.33%	5.00%	(0.33)
Net interest margin	3.80%	3.49%	(0.31)
Operating costs / Average assets	1.7%	1.7%	0.0
Cost/income ratio	32.0%	33.6%	1.6
Net loans to deposits (FX-adjusted)	76%	75%	(2)
FX rates	2024 HUF	2025 HUF	Change %
HUF/BGN (closing)	209.7	197.0	(6)
HUF/BGN (average)	201.6	204.0	1

**On 1 January 2026, Bulgaria officially became the 21<sup>st</sup> member of the euro area. The transition at DSK Group went smoothly. After the announcement of eurozone accession in July 2025, a positive turn arose in the previously lagging corporate loan demand, while retail loans maintained the strong momentum of recent years and expanded at a double-digit rate in 2025. The last quarter preceding the accession generated significant deposit inflows. DSK Group maintained its market leader position in the retail segment and ranked second in Bulgaria's banking sector by total assets.**

In 2025, **DSK Group** generated HUF 211.3 billion profit after tax, 5% more than in the previous year. This brought its ROE to 20.3%.

Full-year operating profit improved by 3% in BGN terms, with the biggest contributor being the 12% y-o-y expansion in net fee and commission income, while operating expenses rose by 10%.

Net interest income grew by 3% compared to the previous year: the significant increase in business volumes counterbalanced the 31 bps decline in net interest margin, largely determined by the ECB's interest rate cuts. In 2025, net interest income was adversely affected by the mandatory reserve requirement rate that was kept at 12% from July 2023, as the central bank did not pay interest on that stock. With the accession to the eurozone, the mandatory reserve ratio fell to 1%, consequently, the required reserve amount decreased from nearly EUR 2 billion at year-end 2025 to approximately EUR 0.1 billion from 2026.

In 2025, net fees and commissions grew by 12%, primarily driven by the increase in retail volumes and by higher transaction turnover. Other net non-interest income rose by 6% y-o-y. Following the accession to the euro area, such currency conversion gains, which made up EUR 47 million in 2025, may be halved.

Operating expenses increased by 10% y-o-y (FX-adjusted) in 2025, mainly driven by the high wage inflation that put pressure on personnel costs. As for other expenses, the HUF 1.9 billion y-o-y decline in supervisory fees almost fully offset the growth in the other expense components. The annual cost to income ratio was 33.6%, still among the lowest in OTP Group.

Total risk cost decreased by 19% y-o-y in local currency, and amounted to HUF 17.0 billion in 2025, almost entirely related to loan loss provisions. This brought the credit risk cost ratio to 34 bps. Regarding the Russian government bonds in the Bank's balance sheet, HUF 1.4 billion other risk cost was released in 2025, driven by a HUF 1.8 billion release from the provision on Russian bonds in 4Q, following the maturity of the Russian bond kept in DSK's books at year-end 2025 in the amount of EUR 15 million.

Underlying loan quality trends remained stable: in 2025, the Stage 2 ratio declined by 2.5 pps and the Stage 3 ratio improved by 0.2 pp, to 1.9%, while the own provision coverage of Stage 3 volumes rose by 0.3 pp.

In 2025, performing (Stage 1+2) loans surged by 18% y-o-y (FX-adjusted), propelled by the 22% growth in retail loan volumes: mortgage loans and consumer loans jumped by 30% and 11%, respectively, since the beginning of the year. Corporate (including MSE) loans gained momentum only in the second half of the year, generating 12% annual growth. Leasing volumes expanded by 12%, fuelled by the increase in car leasing portfolios.

Deposits grew by 21% y-o-y (FX-adjusted), fuelled by both retail (+22%) and corporate (including MSE) (+17%) volumes. Toward year-end, as the euro adoption was nearing, retail deposit volumes jumped as expected, generating 12% q-o-q growth. The net loan/deposit ratio was 75% at the end of 2025.

Given that Bulgaria had met the criteria for euro area membership, on 8 July 2025 the European Union's finance ministers adopted the legislation under which Bulgaria officially joined the euro area on 1 January 2026. Bulgaria expects significant economic benefits from the euro adoption: lower transaction and financing costs, greater price transparency, vigorous foreign trade and investments, and stronger working capital inflows supported by enhanced investor confidence.

## OTP BANK SLOVENIA

### Performance of OTP Bank Slovenia:

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		113,282	105,833	(7)
Adjustments (after tax)		0	0	
Adjusted profit after tax		113,282	105,833	(7)
Income tax		(24,288)	(20,972)	(14)
Profit before income tax		137,570	126,805	(8)
Operating profit		145,858	133,731	(8)
Total income		251,993	235,932	(6)
Net interest income		190,303	179,928	(5)
Net fees and commissions		53,756	52,994	(1)
Other net non-interest income		7,934	3,010	(62)
Operating expenses		(106,135)	(102,201)	(4)
Total provisions		(8,288)	(6,927)	(16)
Provision for impairment on loan losses		(8,640)	(7,315)	(15)
Other provision		352	388	10
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		6,106,968	5,928,358	(3)
Gross customer loans		2,908,790	2,979,608	2
Gross customer loans (FX-adjusted)		2,733,674	2,979,608	9
Stage 1+2 customer loans (FX-adjusted)		2,678,643	2,888,167	8
Retail loans		1,388,854	1,466,675	6
Retail mortgage loans		894,277	924,812	3
Retail consumer loans		444,931	486,065	9
MSE loans		49,646	55,798	12
Corporate loans		1,084,988	1,200,930	11
Leasing		204,802	220,563	8
Allowances for possible loan losses		(53,030)	(51,136)	(4)
Allowances for possible loan losses (FX-adjusted)		(49,840)	(51,136)	3
Deposits from customers		4,774,165	4,727,443	(1)
Deposits from customers (FX-adjusted)		4,479,650	4,727,443	6
Retail deposits		3,593,851	3,851,689	7
Retail deposits		3,127,272	3,358,282	7
MSE deposits		466,579	493,407	6
Corporate deposits		885,799	875,754	(1)
Liabilities to credit institutions		58,588	34,945	(40)
Issued securities		368,829	305,326	(17)
Subordinated debt		32,818	30,841	(6)
Total shareholders' equity		777,525	746,666	(4)
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		2,426,800	2,644,651	9
Stage 1 loans under IFRS 9/gross customer loans		83.4%	88.8%	5.3
Own coverage of Stage 1 loans under IFRS 9		0.2%	0.2%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)		423,434	243,516	(42)
Stage 2 loans under IFRS 9/gross customer loans		14.6%	8.2%	(6.4)
Own coverage of Stage 2 loans under IFRS 9		4.7%	3.3%	(1.4)
Stage 3 loan volume under IFRS 9 (in HUF million)		58,555	91,441	56
Stage 3 loans under IFRS 9/gross customer loans		2.0%	3.1%	1.1
Own coverage of Stage 3 loans under IFRS 9		46.4%	42.6%	(3.7)
Provision for impairment on loan losses/average gross loans		0.30%	0.25%	(0.05)
Performance Indicators		2024	2025	pps
ROA		1.9%	1.8%	(0.2)
ROE		16.1%	14.2%	(1.9)
Total income margin		4.28%	3.95%	(0.34)
Net interest margin		3.23%	3.01%	(0.22)
Operating costs / Average assets		1.8%	1.7%	(0.1)
Cost/income ratio		42.1%	43.3%	1.2
Net loans to deposits (FX-adjusted)		60%	62%	2
FX rates		2024	2025	Change
		HUF	HUF	%
HUF/EUR (closing)		410.1	385.4	(6)
HUF/EUR (average)		394.2	399.1	1

**Reclassifying some corporate exposures that are sensitive to business cycles into Stage 3 category, higher impairment charges, and a decreasing interest rate environment resulted in a y-o-y drop in financial performance. Nonetheless, the performing loan portfolio has grown significantly, and the bank's market share improved in a number of segments.**

In 2025, the **Slovenian operation** realized HUF 106 billion profit after tax (-7% y-o-y), which brought its ROE to 14.2%.

The 8% y-o-y drop in full-year operating profit primarily stemmed from a 6% decline in income, which was only partly offset by the 4% drop in operating expenses. As the ECB lowered interest rates by a total of 1 pp last year, cumulative net interest margin eroded by 22 bps, and net interest income dropped by 5%, despite an expansion in performing loan volumes. However, thanks to active pricing steps and a favourable portfolio composition, the interest margin could be maintained above 3%, which is significantly higher than the sector average (2.7%). Net fee and commission income declined marginally y-o-y, while other non-interest income dropped to less than half of its previous level.

In another favourable development, the Bank realized almost EUR 32 million cost synergies in the first full year following the SKB-NKBM integration, accomplished in 3Q 2024.

The number of full-time employees has dropped by 243 since the integration, and the number of branches currently stands at 74. Given the contractual cooperation with Post of Slovenia, as well as the number of the Bank's branches and ATMs, the Bank has the most extensive sales network in Slovenia.

The annual cost/income ratio rose by 1.2 pps, to 43.3% y-o-y as the efficient cost management could only partly offset the weaker revenue dynamics. Credit risk costs declined by 15%.

Within the loan portfolio, the retail segment remained stable overall, but the stock of Stage 3 corporate loans has grown, thus the Bank's Stage 3 indicator jumped to 3.1% (+1.1 pps y-o-y). Simultaneously with the reclassification, the Stage 2 ratio sank to 8.2% (-6.4 pps y-o-y).

As for balance sheet items, the FX-adjusted stock of performing loans expanded by 8% in 2025, with volumes increasing meaningfully across all segments: corporate and MSE loans' growth rate exceeded 10%, but consumer loans also performed excellently. Simultaneously, the market share of cash loans improved by 1.3 pps y-o-y, drawing near 31%, while corporate loans' share improved by almost 1 pp last year.

The deposit book expanded by an FX-adjusted 6% y-o-y in 2025, mainly thanks to the retail segment (+7%); the corporate book declined marginally. The market share of retail deposits was 31%. The Bank's net loan-to-deposit ratio increased by 2 pps last year, to 62%.

The Bank's capital adequacy and liquidity ratios safely exceed the minimum legal requirements: at the end of December, the CAR ratio was at 21.2%, the Tier 1 was at 20.5%, while the LCR ratio stood at 394%. In April 2025, the Bank paid EUR 233 million in dividends to the parent bank, against the 2024 profit.

The Bank closed last year with EUR 15.4 billion total assets, which ranks it second among Slovenia's banks.

The Slovenian subsidiary bank safely meets the MREL requirements. In May 2025, the Bank successfully issued MREL-eligible Senior Preferred bonds with nominal value of EUR 300 million, which partly refinanced the EUR 400 million worth of SP receivables in June.

## OTP BANK CROATIA

### Performance of OTP Bank Croatia:

Main components of P&L account	2024 HUF million	2025 HUF million	Change %
Profit after tax	61,743	54,591	(12)
Adjustments (after tax)	0	0	
Adjusted profit after tax	61,743	54,591	(12)
Income tax	(13,675)	(12,297)	(10)
Profit before income tax	75,417	66,889	(11)
Operating profit	73,593	69,634	(5)
Total income	138,874	143,651	3
Net interest income	105,300	106,903	2
Net fees and commissions	28,923	31,441	9
Other net non-interest income	4,652	5,307	14
Operating expenses	(65,282)	(74,016)	13
Total provisions	1,825	(2,746)	
Provision for impairment on loan losses	10,435	3,145	(70)
Other provision	(8,610)	(5,891)	(32)
Main components of balance sheet (closing balances)	2024	2025	%
Total assets	3,784,532	3,878,564	2
Gross customer loans	2,762,945	2,809,007	2
Gross customer loans (FX-adjusted)	2,596,491	2,809,007	8
Stage 1+2 customer loans (FX-adjusted)	2,522,235	2,735,726	8
Retail loans	1,378,587	1,589,948	15
Retail mortgage loans	734,003	829,124	13
Retail consumer loans	554,818	632,583	14
MSE loans	89,765	128,241	43
Corporate loans	932,902	911,340	(2)
Leasing	210,747	234,438	11
Allowances for possible loan losses	(88,780)	(80,259)	(10)
Allowances for possible loan losses (FX-adjusted)	(83,435)	(80,259)	(4)
Deposits from customers	2,683,855	2,786,251	4
Deposits from customers (FX-adjusted)	2,509,514	2,786,251	11
Retail deposits	1,840,618	2,077,464	13
Retail deposits	1,604,547	1,794,934	12
MSE deposits	236,070	282,531	20
Corporate deposits	668,896	708,787	6
Liabilities to credit institutions	465,507	466,527	0
Subordinated debt	45,555	69,730	53
Total shareholders' equity	483,716	466,311	(4)
Loan Quality	2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)	2,384,302	2,500,968	5
Stage 1 loans under IFRS 9/gross customer loans	86.3%	89.0%	2.7
Own coverage of Stage 1 loans under IFRS 9	0.5%	0.5%	0.0
Stage 2 loan volume under IFRS 9 (in HUF million)	299,625	234,758	(22)
Stage 2 loans under IFRS 9/gross customer loans	10.8%	8.4%	(2.5)
Own coverage of Stage 2 loans under IFRS 9	6.7%	6.6%	(0.1)
Stage 3 loan volume under IFRS 9 (in HUF million)	79,019	73,281	(7)
Stage 3 loans under IFRS 9/gross customer loans	2.9%	2.6%	(0.3)
Own coverage of Stage 3 loans under IFRS 9	72.1%	72.0%	(0.1)
Provision for impairment on loan losses/average gross loans	(0.41%)	(0.11%)	0.30
Performance Indicators	2024	2025	pps
ROA	1.7%	1.4%	(0.3)
ROE	14.2%	11.8%	(2.4)
Total income margin	3.93%	3.75%	(0.18)
Net interest margin	2.98%	2.79%	(0.19)
Operating costs / Average assets	1.8%	1.9%	0.1
Cost/income ratio	47.0%	51.5%	4.5
Net loans to deposits (FX-adjusted)	100%	98%	(2)
FX rates	2024 HUF	2025 HUF	Change %
HUF/EUR (closing)	410.1	385.4	(6)
HUF/EUR (average)	394.2	399.1	1

**The Croatian bank achieved a balanced business performance in 2025: its profit after tax amounted to HUF 55 billion, the quality of the loan portfolio improved further, performing loans, primarily retail volumes, expanded significantly, while the declining EUR interest rate environment, regulatory steps affecting fee income, and increased costs driven by significant wage inflation had adverse effects.**

The Croatian operation's HUF 55 billion profit after tax in 2025 is consistent with 11.8% return on equity.

Operating profit dropped by 5% last year. Within income, net interest income grew by 2%. In 2025, the European Central Bank continued the monetary easing it had begun in 2024: the policy rate was reduced four times during the year, by a total of 100 bps, thus it dropped to 2.0% by June, returning to early-2023 levels. The declining interest rate environment and intensifying competition put pressure on margins: the annual net interest margin narrowed by 19 bps. In a positive development, net interest margin stabilized in the second half of 2025.

Net fees and commissions increased by 9% y-o-y. In Croatia, the preparation of the regulatory framework for retail banking fees entered the parliamentary phase in 2025: the government submitted the proposal on 15 May 2025, aiming to eliminate certain fee elements and strengthen access to basic payment accounts, in line with EU directives. The parliament ultimately adopted the proposal on 15 July 2025. In parallel, the non-binding recommendation of the Croatian Central Bank – which requested the postponement of inflation-linked increases in retail fees until 30 June 2025 and which the Croatian subsidiary also adhered to – expired.

In 2025, operating expenses surged by 13%. The increase in non-interest expenses primarily stemmed from higher IT expenses and increased real estate-related costs. The rise in personnel costs reflects wage inflation, while the average number of employees remained broadly unchanged. As a result, the cost-to-income ratio rose by 4.5% y-o-y, to 51.5%.

In 2025, credit risk costs amounted to HUF 2.7 billion. Within that, other risk costs amounted to HUF 5.9 billion, largely related to ongoing litigations, while HUF 3.1 billion was released on the provision for impairment on loan losses line due to improving portfolio quality in the large corporate segment. The risk profile of the loan portfolio improved y-o-y: by the end of December, the ratio of Stage 3 loans dropped by 0.3 pps, to 2.6%, while the own provision coverage of the Stage 3 portfolio reached 72.0%.

FX-adjusted performing (Stage 1+2) loan volumes grew by 8% y-o-y. In the retail segment, demand remained great, partly owing to the stimulating effect of the ECB's interest rate cut cycle, and also because of the mortgage facility offered at fixed-interest-rate until the end of the term, as part of a campaign launched in the second quarter. As a result, the mortgage loan book grew by 13% y-o-y, while disbursement volumes were 30% higher than a year earlier. In the second half of the year there was a deceleration, primarily because tighter regulatory rules for debt-service-to-income (DSTI) and loan-to value (LTV) ratios took effect on 1 July, noticeably slowing the dynamics of new placements.

Consumer loan volumes also surged meaningfully, by 14% y-o-y. Sales of cash loans were exceptionally strong in September-October, thanks to the bank's promotional campaign, and the market share has also improved.

The development of the leasing portfolio continues to be determined by the highly seasonal demand related to tourism: accordingly, yet it exceeded the previous year's level by 11%. The corporate (including MSE) loan portfolio grew by 2% y-o-y.

FX-adjusted deposit volumes expanded by 11% y-o-y, of which retail deposits increased by 12%. Government securities and other alternative investment options that offer higher yields continue to attract retail savings, which had a noticeable impact on the pricing of bank deposit products. Corporate (including MSE) deposits grew by 10% y-o-y. At the end of December, the net loan/deposit ratio stood at 98%, reflecting a stable balance sheet structure.

**OTP BANK SERBIA****Performance of OTP Bank Serbia:**

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		66,496	79,324	19
Adjustments (after tax)		0	0	
Adjusted profit after tax		66,496	79,324	19
Income tax		(10,973)	(11,493)	5
Profit before income tax		77,469	90,816	17
Operating profit		95,474	97,283	2
Total income		153,562	161,850	5
Net interest income		116,621	118,297	1
Net fees and commissions		21,726	26,552	22
Other net non-interest income		15,216	17,000	12
Operating expenses		(58,089)	(64,567)	11
Total provisions		(18,005)	(6,466)	(64)
Provision for impairment on loan losses		(15,860)	(5,883)	(63)
Other provision		(2,145)	(583)	(73)
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		3,483,775	3,438,979	(1)
Gross customer loans		2,341,379	2,515,142	7
Gross customer loans (FX-adjusted)		2,198,358	2,515,142	14
Stage 1+2 customer loans (FX-adjusted)		2,140,284	2,455,667	15
Retail loans		1,005,691	1,164,544	16
Retail mortgage loans		458,488	510,608	11
Retail consumer loans		490,546	584,301	19
MSE loans		56,656	69,635	23
Corporate loans		1,026,355	1,171,820	14
Leasing		108,239	119,303	10
Allowances for possible loan losses		(81,828)	(76,426)	(7)
Allowances for possible loan losses (FX-adjusted)		(76,813)	(76,426)	(1)
Deposits from customers		2,343,130	2,273,048	(3)
Deposits from customers (FX-adjusted)		2,193,475	2,273,048	4
Retail deposits		1,185,511	1,330,798	12
Retail deposits		1,025,713	1,150,601	12
MSE deposits		159,798	180,197	13
Corporate deposits		1,007,964	942,250	(7)
Liabilities to credit institutions		565,834	583,402	3
Subordinated debt		71,443	67,318	(6)
Total shareholders' equity		436,608	450,161	3
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		2,012,765	2,225,580	11
Stage 1 loans under IFRS 9/gross customer loans		86.0%	88.5%	2.5
Own coverage of Stage 1 loans under IFRS 9		0.6%	0.6%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)		266,711	230,087	(14)
Stage 2 loans under IFRS 9/gross customer loans		11.4%	9.1%	(2.2)
Own coverage of Stage 2 loans under IFRS 9		10.9%	11.0%	0.1
Stage 3 loan volume under IFRS 9 (in HUF million)		61,903	59,475	(4)
Stage 3 loans under IFRS 9/gross customer loans		2.6%	2.4%	(0.3)
Own coverage of Stage 3 loans under IFRS 9		64.8%	64.7%	(0.1)
Provision for impairment on loan losses/average gross loans		0.75%	0.24%	(0.50)
Performance Indicators		2024	2025	pps
ROA		2.1%	2.3%	0.1
ROE		16.5%	18.1%	1.6
Total income margin		4.94%	4.64%	(0.30)
Net interest margin		3.75%	3.39%	(0.36)
Operating costs / Average assets		1.9%	1.8%	0.0
Cost/income ratio		37.8%	39.9%	2.1
Net loans to deposits (FX-adjusted)		97%	107%	11
FX rates		2024	2025	Change
		HUF	HUF	%
HUF/RSD (closing)		3.5	3.3	(6)
HUF/RSD (average)		3.4	3.4	1

**Despite the geopolitically induced economic challenges and adverse regulatory changes, the Serbian banking group's performance improved in 2025. Thanks to the dynamic growth in loan volumes, the Bank maintained its market leading position in terms of net loans. Loan portfolio quality has improved further.**

In 2025, the profit after tax expanded by 19% y-o-y, to HUF 79.3 billion, which translates into an 18.1% annual ROE. P&L developments benefited from the recovery in business activity and a significant, 64% y-o-y drop in risk-cost levels.

Net interest income improved marginally, by 1% last year. As a result of the increasing demand for credit, the performing loan portfolio expanded at a double-digit rate, yet net interest margin declined by 36 bps y-o-y, to 3.39%. One reason for that was that almost two-thirds of the loans are FX-denominated, predominantly in EUR, therefore the declining interest rate environment in the euro area and the fierce market competition both worked towards narrower margins. Margin dynamics were also adversely affected by the National Bank of Serbia's set of measures that took effect in September 2025, which required banks to reduce the interest rate on consumer and refinancing loans by at least 300 bps for customers whose monthly income does not exceed RSD 100,000, for a period of at least one year from 15 September 2025, compared to the average nominal interest rate in July 2025. This regulation does not pertain to banks that have already applied 7.5% or lower interest rates for customers with contracts of employment, or applied the 10.5% interest rate in the case of pensioners' loans that are combined with life insurance. Besides, relating to housing loans, the regulation also requires banks to launch a new product with the interest rate at least 50 bps below the average interest on newly placed mortgage loans in July 2025.

The 22% y-o-y growth in net fees and commissions was primarily driven by the increase in card-scheme incentives.

The 11% increase in annual operating expenses was primarily caused by the wage hikes in the high-inflation environment, as well as by higher other expenses, including supervisory fees, IT expenses, as well as property management costs. The cost/income ratio of 39.9% is more favourable than the group's average.

In 2025, risk costs totalled HUF 6.5 billion, of which HUF 5.9 billion was related to credit risk. The development of impairment was primarily driven by the deterioration in macroeconomic expectations: the IFRS 9 macro-parameter revisions in 2Q and 4Q 2025 resulted in a total of HUF 6.3 billion impairment charge. In contrast, in 4Q 2025 the reclassification of a corporate exposure had an offsetting effect. The exposure was downgraded to Stage 3 in September, which required an increase in the coverage level. Subsequently, based on the improvement in the outlook, the exposure was reclassified back to Stage 2 while maintaining the elevated coverage level. In 4Q, the client partially repaid the exposure, enabling a provision release of HUF 5.9 billion.

The quality of the loan portfolio continued to improve: by the end of the year, the ratio of Stage 3 loans had declined to 2.4%, while their coverage remained practically unchanged y-o-y at 64.7%. It is also a positive development that the proportion of Stage 2 loans decreased y-o-y, despite the fact that the above-mentioned corporate exposure was reclassified from Stage 3 to Stage 2 in 4Q.

The FX-adjusted performing (Stage 1+2) loan portfolio increased by 15% in 2025; within this, mortgage loan volumes grew by 11%. Within loan disbursements, the share of lower-margin products continued to rise, driven partly by intensifying market competition and partly by the launch of the state-subsidized housing loan programme for young people, available from March 2025. The programme allows for a maximum loan amount of EUR 100,000, a minimum 1% downpayment and a maturity of up to 40 years. During the first six years, the state covers 2 pps of the 3.5% fixed interest rate, meaning that customers effectively repay the loan at an interest rate of 1.5% in this period. A state guarantee applies to 40% of the loan during the first ten years.

Consumer loans surged by an FX-adjusted 19% y-o-y, with growth mainly driven by cash loans and car loans. The growth was supported by the increase in the maximum loan amounts available and by the several interest-rate caps introduced by the National Bank of Serbia on consumer loan products during 2025.

The corporate (including MSE) loan book also grew dynamically, by 15% y-o-y. Growth was supported by the declining interest rate environment as well as the impact of government guarantee programs.

By the end of 2025, deposit volumes were nearing HUF 2,300 billion, which translates into an FX-adjusted 4% y-o-y increase. Retail deposit volumes surged by 12%, chiefly driven by the growth of RSD and EUR demand deposits, as well as the higher deposit interest rates paid on them. The bank is the second-largest player in the Serbian deposit market. The net loan/deposit ratio was at 107% at the end of December, a significant improvement from the 144% ratio in 2022.

**IPOTEKA BANK (UZBEKISTAN)****Performance of Ipoteka Bank (Uzbekistan):**

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		52,893	49,496	(6)
Adjustments (after tax)		0	0	
Adjusted profit after tax		52,893	49,496	(6)
Income tax		(10,949)	(7,591)	(31)
Profit before income tax		63,842	57,087	(11)
Operating profit		78,037	64,252	(18)
Total income		125,768	116,708	(7)
Net interest income		108,715	98,378	(10)
Net fees and commissions		9,502	13,476	42
Other net non-interest income		7,551	4,854	(36)
Operating expenses		(47,731)	(52,455)	10
Total provisions		(14,195)	(7,166)	(50)
Provision for impairment on loan losses		(11,472)	(5,696)	(50)
Other provision		(2,723)	(1,470)	(46)
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		1,509,536	1,484,426	(2)
Gross customer loans		1,063,551	1,042,097	(2)
Gross customer loans (FX-adjusted)		943,252	1,042,097	10
Stage 1+2 customer loans (FX-adjusted)		813,217	891,863	10
Retail loans		646,721	746,166	15
Retail mortgage loans		389,895	461,388	18
Retail consumer loans		223,423	264,917	19
MSE loans		33,402	19,861	(41)
Corporate loans		166,496	145,696	(12)
Allowances for possible loan losses		(120,766)	(113,037)	(6)
Allowances for possible loan losses (FX-adjusted)		(106,854)	(113,037)	6
Deposits from customers		528,602	482,720	(9)
Deposits from customers (FX-adjusted)		465,605	482,720	4
Retail deposits		239,596	227,503	(5)
Retail deposits		159,351	166,362	4
MSE deposits		80,245	61,142	(24)
Corporate deposits		226,009	255,216	13
Liabilities to credit institutions		566,620	543,318	(4)
Issued securities		158,546	171,748	8
Subordinated debt		13,358	10,312	(23)
Total shareholders' equity		214,152	240,326	12
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		716,723	799,627	12
Stage 1 loans under IFRS 9/gross customer loans		67.4%	76.7%	9.3
Own coverage of Stage 1 loans under IFRS 9		2.6%	2.3%	(0.3)
Stage 2 loan volume under IFRS 9 (in HUF million)		199,067	92,236	(54)
Stage 2 loans under IFRS 9/gross customer loans		18.7%	8.9%	(9.9)
Own coverage of Stage 2 loans under IFRS 9		19.6%	16.4%	(3.2)
Stage 3 loan volume under IFRS 9 (in HUF million)		147,761	150,234	2
Stage 3 loans under IFRS 9/gross customer loans		13.9%	14.4%	0.5
Own coverage of Stage 3 loans under IFRS 9		42.6%	52.8%	10.2
Provision for impairment on loan losses/average gross loans		1.16%	0.56%	(0.60)
Performance Indicators		2024	2025	pps
ROA		4.0%	3.5%	(0.5)
ROE		30.2%	22.4%	(7.8)
Total income margin		9.61%	8.32%	(1.29)
Net interest margin		8.31%	7.01%	(1.29)
Operating costs / Average assets		3.6%	3.7%	0.1
Cost/income ratio		38.0%	44.9%	7.0
Net loans to deposits (FX-adjusted)		180%	192%	13
FX rates		2024	2025	Change
		HUF	HUF	%
HUF/1.000 UZS (closing)		30.5	27.3	(10)
HUF/1.000 UZS (average)		28.8	28.2	(2)

**After Ipoteka Bank became a Group member in June 2023, in the second half of 2023 the focus was on portfolio clean-out, then in 2024 and the first half of 2025 the focus was on transformation and deposit-taking. In the middle of 2025 a turnaround in retail lending unfolded, the Bank's market shares began to improve in the major retail product segments. Simultaneously, net interest margin and operating profit both began to improve in the second half of 2025.**

In 2025 performing loans grew by 10% FX-adjusted overall, as a result of 19% growth in consumer loans and 18% expansion in mortgage loan volumes, as well as a 17% contraction in corporate (including MSE) volumes.

Favourable development was in 2025 that the Bank's market share in new cash loan placements began to pick up from June, reversing the previous quarters' erosion in the stock market share in cash loans. The surge in loan placements was facilitated by the progress made in the IT environment, as well as in the organizational and operational frameworks and capabilities. These developments not only supported a general increase in lending activity but also enabled the Bank to open up towards new customer segments that had not been served previously due to the lack of sophisticated and automated credit assessment capabilities and data.

In 2025, the disbursement of cash loans more than doubled in 2025. The Bank's market share in cash loan disbursements improved by 2.8 pps y-o-y (2024: 7.5%, 1H 2025: 7.3%, 3Q: 12.1%, 4Q: 16.7%). Since December 2025, cash loans have been available only on digital channels.

Mortgage lending also developed favourably: annual disbursements increased by nearly 40%, thus, the market share in outstanding mortgage loan volumes has started to improve since June 2025, and reached 22.6% by the end of the year. The performing mortgage loans grew by 18% y-o-y (FX-adjusted). Corporate (including MSE) portfolios decreased by 17% y-o-y, mostly because a big corporate exposure was reclassified into Stage 3 category in 3Q furthermore, new disbursements remained moderate.

The FX-adjusted deposit book grew by 4% y-o-y.

The net loan to deposit ratio was 192% at the end of 2025. The net loan to deposit ratio, without the subsidized and state-refinanced mortgage loans, stood at 110% at the end of 2025.

Regarding profitability, Ipoteka Bank generated almost HUF 50 billion profit after tax in 2025, which translated into more than 22% ROE.

As for the evolution of operating profit in 2025, a positive trend has unfolded following the local minimum recorded in 2Q 2025, primarily attributable to the improving net interest margin. Annual net interest income dropped by a total of 10%.

In 2025, net fees and commissions grew by 42% y-o-y in HUF terms, largely because of new fees introduced in 3Q.

Full-year other income amounted to almost HUF 5 billion, which is consistent with 36% y-o-y decrease.

Operating expenses grew by 10% in 2025, largely owing to the increase in depreciation and in other expenses.

Last year, nearly HUF 7 billion risk cost weighed on profit, and the vast majority of that was recorded in 3Q, mainly because of two corporate loans disbursed prior to the acquisition.

The ratio of Stage 3 loans dropped by 0.5 pp y-o-y, to 14.4%. The own provision coverage of Stage 3 loans improved by 10.2 pps in full year 2025 to 52.8%. The ratio of Stage 2 loans has practically halved, thus it stood at 8.9% at the end of 2025. Most of the ratio's improvement happened in 4Q (-5.9 pps q-o-q), which was mainly caused by the transition to a more advanced risk assessment methodology already applied by the Group's other subsidiaries, as a result of which mostly Stage 2 mortgage loans were reclassified into Stage 1.

The Bank issued an USD 300 million senior unsecured bond, as well as UZS 1,200 billion (about USD 100 million equivalent) senior unsecured bonds. On 30 October 2025, Ipoteka Bank redeemed senior unsecured bonds with nominal value of USD 300 million.

**OTP BANK UKRAINE****Performance of OTP Bank Ukraine:**

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		41,179	55,849	36
Adjustments (after tax)		0	0	
Adjusted profit after tax		41,179	55,849	36
Income tax		(31,663)	(10,597)	(67)
Profit before income tax		72,842	66,446	(9)
Operating profit		68,414	73,522	7
Total income		101,605	108,651	7
Net interest income		89,894	96,238	7
Net fees and commissions		7,769	7,816	1
Other net non-interest income		3,942	4,598	17
Operating expenses		(33,191)	(35,130)	6
Total provisions		4,428	(7,076)	
Provision for impairment on loan losses		9,123	(4,722)	
Other provision		(4,695)	(2,354)	(50)
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		1,186,801	1,139,284	(4)
Gross customer loans		440,897	445,995	1
Gross customer loans (FX-adjusted)		374,529	445,995	19
Stage 1+2 customer loans (FX-adjusted)		332,848	421,341	27
Retail loans		34,111	59,070	73
Retail mortgage loans		1,026	892	(13)
Retail consumer loans		33,036	58,144	76
MSE loans		48	33	(31)
Corporate loans		210,485	266,460	27
Leasing		88,252	95,811	9
Allowances for possible loan losses		(52,283)	(35,766)	(32)
Allowances for possible loan losses (FX-adjusted)		(44,309)	(35,766)	(19)
Deposits from customers		842,437	828,899	(2)
Deposits from customers (FX-adjusted)		712,754	828,899	16
Retail deposits		256,790	280,349	9
Retail deposits		222,677	245,256	10
MSE deposits		34,113	35,093	3
Corporate deposits		455,964	548,550	20
Liabilities to credit institutions		97,486	71,438	(27)
Subordinated debt		8,879	0	(100)
Total shareholders' equity		205,705	212,210	3
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		323,190	361,194	12
Stage 1 loans under IFRS 9/gross customer loans		73.3%	81.0%	7.7
Own coverage of Stage 1 loans under IFRS 9		2.2%	2.5%	0.3
Stage 2 loan volume under IFRS 9 (in HUF million)		68,647	60,146	(12)
Stage 2 loans under IFRS 9/gross customer loans		15.6%	13.5%	(2.1)
Own coverage of Stage 2 loans under IFRS 9		13.3%	15.1%	1.8
Stage 3 loan volume under IFRS 9 (in HUF million)		49,059	24,654	(50)
Stage 3 loans under IFRS 9/gross customer loans		11.1%	5.5%	(5.6)
Own coverage of Stage 3 loans under IFRS 9		73.7%	71.4%	(2.3)
Provision for impairment on loan losses/average gross loans		(2.21%)	1.09%	3.31
Performance Indicators		2024	2025	pps
ROA		3.8%	5.0%	1.2
ROE		22.4%	26.3%	4.0
Total income margin		9.39%	9.67%	0.28
Net interest margin		8.30%	8.56%	0.26
Operating costs / Average assets		3.1%	3.1%	0.1
Cost/income ratio		32.7%	32.3%	(0.3)
Net loans to deposits (FX-adjusted)		46%	49%	3
FX rates		2024	2025	Change
		HUF	HUF	%
HUF/UAH (closing)		9.4	7.8	(17)
HUF/UAH (average)		9.1	8.5	(6)

**Amidst the ongoing war, the almost 30% increase in the performing loan portfolio in 2025 illustrates the Ukrainian bank's strong performance and growing business activity. The Ukrainian operation continues to have significant capital and liquidity reserves locally; in case the war is ended or a political settlement is reached, this enables a jump in business activity.**

In 2025, **OTP Bank Ukraine** generated almost HUF 56 billion profit after tax (+36% y-o-y), which brought its ROE to 26.3%.

Profit before tax declined by 9% y-o-y. The main reason for the 67% fall in full-year corporate income tax was that in the fourth quarter of 2024, the tax rate on banks was temporarily raised to 50%, which was retroactively applied from the beginning of that year, while a 25% corporate income tax rate was applied throughout 2025. Furthermore, the Ukrainian leasing company wrote off loans worth HUF 10 billion in the first half-year, which led to HUF 2.2 billion worth of tax shield, and HUF 2.3 billion worth of deferred tax assets were recognized in 4Q. From 2026, the corporate tax rate imposed on banks rose again to 50%, from 25% in 2025.

Full-year operating profit improved by 7% in HUF and by 16% in local currency terms. Total income increased by 15% y-o-y in UAH in 2025. Within that, net interest income improved by 16%, partly due to the dynamic expansion of loans and deposits, as well as to the benign effect of the higher base rate on liquid assets' yields, while net interest margin increased by 26 bps last year. Net fees and commissions rose by 8% in UAH, and other income jumped by 28%.

Full-year operating expenses increased by 14% y-o-y in local currency, mainly driven by higher personnel costs. The cost to income ratio dropped by 0.3 pp y-o-y, to 32.3%, which is still significantly better than the Group's indicator.

In 2025, total risk costs amounted to HUF 7 billion, compared to HUF 4.4 billion positive risk cost in the previous year, mainly related to loans, mostly in the second half-year. Of that, HUF 4 billion risk cost was recorded in the fourth quarter, primarily due to the review of IFRS 9 risk parameters on corporate loans, as well as the expansion of the loan portfolios. The annual credit risk cost ratio was 109 bps. The annual volume of other risk costs primarily related to government securities.

Underlying credit quality trends developed favourably, the Stage 3 ratio declined by 5.6 pps y-o-y, to 5.5%, thanks to non-performing loan write-offs: in the first half-year, a total of HUF 12 billion non-performing exposures were written off, mostly at the Ukrainian leasing company. The own provision coverage of Stage 3 loans exceeded 71%. The ratio of Stage 2 loans in the portfolio has dropped to 13.5% (-2.1 pps y-o-y).

FX-adjusted deposit volumes expanded by 16% y-o-y, thanks to a 10% increase in retail deposits, and a 19% jump in corporate (including MSE) deposits.

It is illustrative of the Bank's conservative balance sheet structure and favourable liquidity position that the net loan to deposit ratio was below 50% at the end of 2025.

The Bank's capital adequacy ratio exceeded the regulatory minimum by a large margin; it was above 29% at the end of December. The amount of free capital above the regulatory minimum requirement exceeded the equivalent of EUR 250 million.

**CKB GROUP (MONTENEGRO)****Performance of CKB Group (Montenegro):**

Main components of P&L account	2024 HUF million	2025 HUF million	Change %
Profit after tax	24,194	22,376	(8)
Adjustments (after tax)	0	0	
Adjusted profit after tax	24,194	22,376	(8)
Income tax	(4,385)	(3,980)	(9)
Profit before income tax	28,579	26,356	(8)
Operating profit	27,169	26,908	(1)
Total income	45,660	47,569	4
Net interest income	35,460	36,581	3
Net fees and commissions	9,729	10,020	3
Other net non-interest income	472	968	105
Operating expenses	(18,492)	(20,660)	12
Total provisions	1,410	(552)	
Provision for impairment on loan losses	1,947	(46)	
Other provision	(538)	(506)	(6)
Main components of balance sheet (closing balances)	2024	2025	%
Total assets	776,370	847,297	9
Gross customer loans	545,499	609,038	12
Gross customer loans (FX-adjusted)	512,657	609,038	19
Stage 1+2 customer loans (FX-adjusted)	497,716	595,041	20
Retail loans	259,677	308,666	19
Retail mortgage loans	123,714	144,155	17
Retail consumer loans	128,785	154,901	20
MSE loans	7,179	9,610	34
Corporate loans	235,644	282,074	20
Leasing	2,395	4,301	80
Allowances for possible loan losses	(16,862)	(15,653)	(7)
Allowances for possible loan losses (FX-adjusted)	(15,847)	(15,653)	(1)
Deposits from customers	606,957	602,692	(1)
Deposits from customers (FX-adjusted)	569,085	602,692	6
Retail deposits	357,378	387,519	8
Retail deposits	277,908	308,971	11
MSE deposits	79,470	78,548	(1)
Corporate deposits	211,707	215,174	2
Liabilities to credit institutions	19,157	80,636	
Total shareholders' equity	121,390	135,781	12
Loan Quality	2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)	492,319	561,392	14
Stage 1 loans under IFRS 9/gross customer loans	90.3%	92.2%	1.9
Own coverage of Stage 1 loans under IFRS 9	0.6%	0.6%	(0.1)
Stage 2 loan volume under IFRS 9 (in HUF million)	37,282	33,649	(10)
Stage 2 loans under IFRS 9/gross customer loans	6.8%	5.5%	(1.3)
Own coverage of Stage 2 loans under IFRS 9	4.8%	6.3%	1.6
Stage 3 loan volume under IFRS 9 (in HUF million)	15,898	13,997	(12)
Stage 3 loans under IFRS 9/gross customer loans	2.9%	2.3%	(0.6)
Own coverage of Stage 3 loans under IFRS 9	74.9%	73.0%	(1.9)
Provision for impairment on loan losses/average gross loans	(0.39%)	0.01%	0.40
Performance Indicators	2024	2025	pps
ROA	3.5%	2.7%	(0.7)
ROE	21.5%	17.4%	(4.2)
Total income margin	6.58%	5.84%	(0.74)
Net interest margin	5.11%	4.49%	(0.62)
Operating costs / Average assets	2.7%	2.5%	(0.1)
Cost/income ratio	40.5%	43.4%	2.9
Net loans to deposits (FX-adjusted)	87%	98%	11
FX rates	2024 HUF	2025 HUF	Change %
HUF/EUR (closing)	410.1	385.4	(6)
HUF/EUR (average)	394.2	399.1	1

**Montenegrin CKB Bank achieved stable results in 2025. The negative impact of the declining EUR interest rate environment on margins was offset by the dynamic expansion in volumes and continued improvement in loan quality, but the double-digit growth in expenses had an adverse effect.**

In 2025, **CKB Group** generated more than HUF 22 billion profit after tax (-8% y-o-y). The full-year ROE was 17.4%.

Total income increased by 4% y-o-y in 2025. Within that, cumulative net interest income rose by 3%, net fees and commissions also increased by 3%, while other income doubled. Net interest income's growth stemmed from expanding volumes, while the margin eroded materially, in line with the sinking EUR interest rate environment. The increase in fee income predominantly stemmed from higher card fee income as bank cards' use soared during a strong summer tourist season.

Full-year operating expenses increased by 11% in EUR, primarily driven by rising personnel costs due to wage inflation, as well as by a 16% increase in supervisory fees under other expenses. The bank's cost/income ratio reached 43.4% in 2025, which is consistent with nearly 3 pps increase from 2024.

In 2025, risk costs amounted to HUF 0.6 billion.

Loan quality was stable throughout last year: the ratio of Stage 3 loans dropped by 0.6 pp y-o-y, to 2.3%. The own provision coverage of Stage 3 loans stood at 73% at the end of the year (-1.9 pps y-o-y).

The performing (Stage 1+2) loan stock grew by 20% y-o-y (FX-adjusted). The expansion in loan volumes and disbursements was supported by the Bank's participation in the central bank's April initiative, which aims to reduce interest rates on mortgage and cash loans. Mortgage lending was also supported by the Bank's continued offering of a mortgage product designed to help first-time homebuyers under the age of 30. This also helped the annual combined mortgage and cash loan disbursement to jump by 19% y-o-y overall, while the stock of retail mortgage and consumer loans expanded by 18% y-o-y. Thanks to the strong demand for corporate loans, this portfolio expanded by 20% y-o-y. Since entering the leasing market in 2024, the Bank has built up a HUF 4.3 billion portfolio.

FX-adjusted deposit volumes increased by 6% y-o-y, as a combined result of an 8% growth in retail and a 2% rise in corporate deposits. The net loan/deposit ratio stood at 98% at the end of the year.

Liabilities to credit institutions grew owing to an EUR 75 million MREL loan from the banking group, which was necessitated by regulatory requirements.

In 2025, the bank maintained its market leading position in Montenegro in terms of total assets.

**OTP BANK ALBANIA****Performance of OTP Bank Albania:**

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		19,686	18,597	(6)
Adjustments (after tax)		0	0	
Adjusted profit after tax		19,686	18,597	(6)
Income tax		(3,763)	(3,478)	(8)
Profit before income tax		23,449	22,075	(6)
Operating profit		23,145	21,543	(7)
Total income		40,047	39,913	0
Net interest income		33,531	33,531	0
Net fees and commissions		4,243	3,895	(8)
Other net non-interest income		2,274	2,487	9
Operating expenses		(16,902)	(18,369)	9
Total provisions		304	531	75
Provision for impairment on loan losses		0	85	
Other provision		304	446	47
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		791,495	818,039	3
Gross customer loans		476,303	499,796	5
Gross customer loans (FX-adjusted)		451,356	499,796	11
Stage 1+2 customer loans (FX-adjusted)		428,497	481,089	12
Retail loans		191,877	216,003	13
Retail mortgage loans		136,827	158,888	16
Retail consumer loans		29,101	36,389	25
MSE loans		25,949	20,726	(20)
Corporate loans		228,476	256,930	12
Leasing		8,145	8,157	0
Allowances for possible loan losses		(20,422)	(19,141)	(6)
Allowances for possible loan losses (FX-adjusted)		(19,365)	(19,141)	(1)
Deposits from customers		615,186	631,867	3
Deposits from customers (FX-adjusted)		580,260	631,867	9
Retail deposits		523,330	554,273	6
Retail deposits		469,695	506,013	8
MSE deposits		53,634	48,260	(10)
Corporate deposits		56,930	77,593	36
Liabilities to credit institutions		14,919	24,094	61
Subordinated debt		0	0	
Total shareholders' equity		114,649	125,921	10
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		416,249	434,618	4
Stage 1 loans under IFRS 9/gross customer loans		87.4%	87.0%	(0.4)
Own coverage of Stage 1 loans under IFRS 9		1.0%	1.1%	0.1
Stage 2 loan volume under IFRS 9 (in HUF million)		35,965	46,472	29
Stage 2 loans under IFRS 9/gross customer loans		7.6%	9.3%	1.7
Own coverage of Stage 2 loans under IFRS 9		8.0%	9.1%	1.1
Stage 3 loan volume under IFRS 9 (in HUF million)		24,090	18,706	(22)
Stage 3 loans under IFRS 9/gross customer loans		5.1%	3.7%	(1.3)
Own coverage of Stage 3 loans under IFRS 9		56.1%	54.9%	(1.2)
Provision for impairment on loan losses/average gross loans		0.00%	(0.02%)	(0.02)
Performance Indicators		2024	2025	pps
ROA		2.7%	2.3%	(0.4)
ROE		20.2%	15.5%	(4.7)
Total income margin		5.49%	4.98%	(0.51)
Net interest margin		4.60%	4.18%	(0.42)
Operating costs / Average assets		2.3%	2.3%	0.0
Cost/income ratio		42.2%	46.0%	3.8
Net loans to deposits (FX-adjusted)		74%	76%	2
FX rates		2024	2025	Change
		HUF	HUF	%
HUF/ALL (closing)		4.2	4.0	(5)
HUF/ALL (average)		3.9	4.1	4

**In 2025, OTP Bank preserved its position in the Albanian banking sector: its market share in net loans was 12.8%, while its return on equity exceeded 15%. As a result of strict risk management, portfolio quality improved further, although narrowing margins tamed income growth, despite the double-digit expansion in loans.**

In 2025, **OTP Bank Albania** generated HUF 19 billion profit after tax. In 2025, the Bank's ROE was above 15%.

At the end of 2025, the Bank's market share by net loan volumes was 12.8%; this ranks it the fourth largest lender in Albania.

The annual operating profit declined by 10% in local currency, as total income dropped by 4% and operating expenses rose by 5%. The decline in revenues primarily stemmed from the 3% drop in net interest income in local currency, which was mainly caused by the significant fall in the yield on financial instruments, as well as by the introduction of SEPA 2025 in October; as a result of the latter, commission income from eurozone transfers decreased. Operating expenses grew on the back of increasing personnel expenses, in a high-wage-inflation environment.

The positive HUF 0.5 billion risk cost recorded in 2025 was partly driven by the full repayment of several problematic corporate clients, while the positive amount shown under other risk costs was partly attributable to the release of an impairment in 2025 previously recognized in relation to the acquisition. Offsetting these effects, the review of parameters in the IFRS 9 risk models resulted in an additional HUF 1.1 billion impairment charge for the full year 2025.

In 2025, the improvement in credit quality indicators continued: the ratio of Stage 3 loans sank by 1.3 pps y-o-y, to 3.7%, while larger corporate loan repayments in 4Q contributed to the further drop of Stage 3 loans and to the composition-driven decline in the own coverage of Stage 3 exposures.

Overall, the FX-adjusted stock of performing (Stage 1+2) loans expanded by 12% in 2025, as a result of an 18% rise in retail loans and a 9% growth in corporate (including MSE) ones.

The FX-adjusted volume of deposits from customers expanded by 9% y-o-y, thanks to an 8% rise in retail deposits and a 14% growth in corporate ones. The net loan to deposit ratio increased by 2 pps y-o-y, reaching the Group's average level, 76%.

**OTP BANK MOLDOVA****Performance of OTP Bank Moldova:**

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		11,492	10,027	(13)
Adjustments (after tax)		0	0	
Adjusted profit after tax		11,492	10,027	(13)
Income tax		(1,546)	(1,472)	(5)
Profit before income tax		13,038	11,498	(12)
Operating profit		12,413	11,456	(8)
Total income		26,179	26,145	0
Net interest income		15,353	17,901	17
Net fees and commissions		2,483	2,331	(6)
Other net non-interest income		8,343	5,913	(29)
Operating expenses		(13,765)	(14,690)	7
Total provisions		625	42	(93)
Provision for impairment on loan losses		574	404	(30)
Other provision		51	(361)	
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		455,246	389,355	(14)
Gross customer loans		180,472	204,662	13
Gross customer loans (FX-adjusted)		166,361	204,662	23
Stage 1+2 customer loans (FX-adjusted)		161,237	200,302	24
Retail loans		74,491	93,371	25
Retail mortgage loans		37,674	46,470	23
Retail consumer loans		26,662	34,968	31
MSE loans		10,154	11,933	18
Corporate loans		81,598	101,165	24
Leasing		5,148	5,767	12
Allowances for possible loan losses		(7,209)	(6,370)	(12)
Allowances for possible loan losses (FX-adjusted)		(6,625)	(6,370)	(4)
Deposits from customers		359,474	303,688	(16)
Deposits from customers (FX-adjusted)		328,691	303,688	(8)
Retail deposits		189,277	192,794	2
Retail deposits		148,740	155,798	5
MSE deposits		40,537	36,997	(9)
Corporate deposits		139,413	110,894	(20)
Liabilities to credit institutions		20,459	16,113	(21)
Total shareholders' equity		69,054	65,247	(6)
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		153,557	181,947	18
Stage 1 loans under IFRS 9/gross customer loans		85.1%	88.9%	3.8
Own coverage of Stage 1 loans under IFRS 9		1.2%	1.3%	0.2
Stage 2 loan volume under IFRS 9 (in HUF million)		21,329	18,355	(14)
Stage 2 loans under IFRS 9/gross customer loans		11.8%	9.0%	(2.9)
Own coverage of Stage 2 loans under IFRS 9		9.0%	8.5%	(0.5)
Stage 3 loan volume under IFRS 9 (in HUF million)		5,586	4,360	(22)
Stage 3 loans under IFRS 9/gross customer loans		3.1%	2.1%	(1.0)
Own coverage of Stage 3 loans under IFRS 9		62.9%	54.6%	(8.3)
Provision for impairment on loan losses/average gross loans		(0.36%)	(0.21%)	0.15
Performance Indicators		2024	2025	pps
ROA		2.7%	2.5%	(0.2)
ROE		17.4%	15.0%	(2.4)
Total income margin		6.06%	6.44%	0.37
Net interest margin		3.56%	4.41%	0.85
Operating costs / Average assets		3.2%	3.6%	0.4
Cost/income ratio		52.6%	56.2%	3.6
Net loans to deposits (FX-adjusted)		49%	65%	17
FX rates		2024	2025	Change
		HUF	HUF	%
HUF/MDL (closing)		21.3	19.6	(8)
HUF/MDL (average)		20.5	20.4	(1)

**Amid high geopolitical risks, the Moldovan subsidiary generated HUF 10 billion profit after tax in 2025, which brought its ROE to 15%. Despite the favourable development in net interest income due to the combined effect of the improving margin and dynamic expansion of loans, operating profit has narrowed overall. Loan portfolio quality has improved.**

The total income of the Moldovan operation overall stagnated in 2025: within that, net interest income expanded by 17%, while net fees and commissions (-6%) and other income (-29%) declined. Net interest income grew because the drop in total assets was offset by the 85 bps improvement in the interest margin, which was partly caused by the y-o-y rise in Moldova's average base rate in 2025, partly by the outflow of higher-interest-rate corporate deposits, and by the increase in the proportion of higher-margin loans on the asset side. The decrease in other income was primarily driven by the decline in revenues from currency exchange, while the reduction in net fees and commissions mainly resulted from lower payment-related fee income and higher fee expenses paid to card companies.

In 2025, operating expenses grew by 7%, largely because personnel expenses increased at the same rate as inflation did, and as depreciations rose by 10%.

Over 2025, near-zero risk costs were recorded. In 4Q, risk costs amounted to +HUF 0.8 billion, mainly because of the improvement in corporate loans that were previously in Stage 2 category, and due to the introduction of a more advanced risk management framework for mortgage loans from 4Q onwards, which led to the lower provisioning needs. The full-year credit risk cost ratio was at 21 bps.

The ratio of Stage 3 loans dropped to 2.1% (-1 pp y-o-y), their own provision coverage improved by 8.3 pps y-o-y, to 54.6%.

The FX-adjusted stock of performing (Stage 1+2) loans expanded by 24% y-o-y, as retail loans grew by 25%, corporate loans increased by 24%, and leasing volumes rose by 12%. Within retail loans, mortgage loan volumes surged by 23% y-o-y, and consumer loans jumped by 31%.

FX-adjusted deposit volumes shrank by 8% y-o-y, owing to an 18% y-o-y contraction in corporate (including MSE) deposits, mainly because a large corporate deposit withdrawal occurred in the first quarter.

A 17% y-o-y increase brought the net loan/deposit ratio to 65% by the end of the year.

**OTP BANK RUSSIA****Performance of OTP Bank Russia:**

Main components of P&L account		2024	2025	Change
		HUF million	HUF million	%
Profit after tax		136,946	202,009	48
Adjustments (after tax)		0	0	
Adjusted profit after tax		136,946	202,009	48
Income tax <sup>1</sup>		(58,589)	(93,977)	60
Profit before income tax		195,536	295,986	51
Operating profit		252,216	415,346	65
Total income		343,619	544,919	59
Net interest income		187,070	296,644	59
Net fees and commissions		55,095	73,390	33
Other net non-interest income		101,454	174,885	72
Operating expenses		(91,403)	(129,573)	42
Total provisions		(56,681)	(119,360)	111
Provision for impairment on loan losses		(54,889)	(121,845)	122
Other provision		(1,792)	2,485	
Main components of balance sheet (closing balances)		2024	2025	%
Total assets		2,370,967	3,320,516	40
Gross customer loans		1,111,220	1,732,713	56
Gross customer loans (FX-adjusted)		1,249,618	1,732,713	39
Stage 1+2 customer loans (FX-adjusted)		1,190,802	1,612,829	35
Retail loans		1,185,834	1,609,830	36
Retail mortgage loans		989	800	(19)
Retail consumer loans		1,184,836	1,609,029	36
MSE loans		10	0	
Corporate loans		4,967	2,999	(40)
Allowances for possible loan losses		(113,633)	(235,528)	107
Allowances for possible loan losses (FX-adjusted)		(126,721)	(235,528)	86
Deposits from customers		1,882,093	2,700,943	44
Deposits from customers (FX-adjusted)		2,082,904	2,700,943	30
Retail deposits		647,539	942,242	46
Retail deposits		488,417	749,435	53
MSE deposits		159,123	192,806	21
Corporate deposits		1,435,365	1,758,702	23
Liabilities to credit institutions		78,331	57,730	(26)
Subordinated debt		8,562	8,763	2
Total shareholders' equity		298,786	440,470	47
Loan Quality		2024	2025	%/pps
Stage 1 loan volume under IFRS 9 (in HUF million)		895,393	1,414,012	58
Stage 1 loans under IFRS 9/gross customer loans		80.6%	81.6%	1.0
Own coverage of Stage 1 loans under IFRS 9		3.0%	4.6%	1.6
Stage 2 loan volume under IFRS 9 (in HUF million)		162,509	198,816	22
Stage 2 loans under IFRS 9/gross customer loans		14.6%	11.5%	(3.2)
Own coverage of Stage 2 loans under IFRS 9		22.9%	29.9%	7.0
Stage 3 loan volume under IFRS 9 (in HUF million)		53,317	119,885	125
Stage 3 loans under IFRS 9/gross customer loans		4.8%	6.9%	2.1
Own coverage of Stage 3 loans under IFRS 9		93.5%	93.2%	(0.3)
Provision for impairment on loan losses/average gross loans		6.0%	7.9%	1.9
Performance Indicators		2024	2025	pps
ROA		7.2%	6.6%	(0.6)
ROE		45.3%	48.8%	3.5
Total income margin		18.11%	17.90%	(0.21)
Net interest margin		9.86%	9.75%	(0.11)
Operating costs / Average assets		4.8%	4.3%	(0.6)
Cost/income ratio		26.6%	23.8%	(2.8)
Net loans to deposits (FX-adjusted)		54%	55%	2
FX rates		2024	2025	Change
		HUF	HUF	%
HUF/RUB (closing)		3.7	4.1	13
HUF/RUB (average)		3.9	4.2	7

<sup>1</sup>The Corporate income tax line includes the corporate income tax in the Russian segment, as well as the dividend taxes incurred at other members of OTP Group because of the Russian Group members' dividend payment.

**OTP Group's strategic goals in Russia have not changed: the most important consideration is to comply with every relevant rule and regulation including sanctions, while maintaining the reduced scope of activities to less sensitive segments and financial services. Within lending, the focus remains on retail consumer loans, while the parent bank continues to pursue a further reduction of its exposure to Russia. In the context of the latter, at the end of 2022, the Russian operation paid back the full amount of its expiring intergroup liabilities. In addition to this, with the approval of the Central Bank of Russia, a total of RUB 67.7 billion dividend has been paid since September 2023, including RUB 25.9 billion in 2025.**

In 2025, **OTP Bank Russia** generated HUF 202.0 billion profit after tax. The main engines of the 48% y-o-y profit growth were the stronger interest income and the other income, and within that, predominantly the surge in the FX conversion margin. Meanwhile, the increase in the corporate income tax rate from 20% to 25% from January 2025 as well as the more than doubling higher total risk cost had adverse effects.

In 2025, net interest margin dropped slightly, by 11 bps. Meanwhile, net interest income jumped by 59%, driven by the expansion in consumer loans and deposits.

The Central Bank of Russia tightened macroprudential rules several times, aiming at reducing the disbursement of consumer loans. The recycling fee for cars, introduced from 1 November, has further hindered disbursements. Rules for car loan application are likely to be further tightened in the first quarter of 2026.

Although annual commission income increased by 24% y-o-y in RUB, a downward trend began from the end of the second quarter, mainly because consumer loan disbursements declined owing to the tighter macroprudential regulation.

Other net non-interest income jumped by 61% y-o-y in RUB, owing to the higher currency conversion margin.

Cumulative operating expenses grew by 32% in RUB, mainly propelled by persistently high headline and wage inflation. Meanwhile, since the beginning of the war the number of branches has fallen by 57% and that of employees has dropped by 25% in Russia.

Annual credit risk costs doubled – in addition to the prudent provisioning for the growing loan portfolio, the revisions of the IFRS 9 model macro parameters in the second and fourth quarters also played a role. The credit risk cost ratio was 7.9% in 2025. The Stage 3 ratio rose by 2.1 pps y-o-y, to 6.9%. Unlike in previous years, there were no non-performing loans sales in 4Q 2025.

FX-adjusted performing (Stage 1+2) retail consumer loans expanded by 36% in 2025, propelled by the growth in car loans and cash loans. As a result of the waste tax on cars from 1 November, the disbursement of car loans declined q-o-q in 4Q. By the end of 2025, the performing corporate loan book made up a marginal slice (0.2%) of the total loan stock, in line with the management's decision in 2022 to wind down corporate lending activity.

Deposits expanded by 30% in 2025 (FX-adjusted). Within this, the stock of retail term deposits grew the most, by more than 60%. Corporate deposits, typically placed by foreign owned multinational clients, grew by 23% in 2025. The net loan to deposit ratio was 55% at the end of the year.

**STAFF LEVEL AND OTHER INFORMATION**

	31/12/2024				31/12/2025			
	Branches	ATM	POS	Headcount (closing)	Branches	ATM	POS	Headcount (closing)
<b>OTP Core</b>	<b>317</b>	<b>1,931</b>	<b>170,708</b>	<b>11,404</b>	<b>301</b>	<b>1,987</b>	<b>150,158</b>	<b>11,731</b>
DSK Group (Bulgaria)	278	962	19,643	5,149	274	955	20,994	5,319
OTP Bank Slovenia	82	412	14,626	2,310	74	390	13,001	2,117
OBH (Croatia)	105	445	11,704	2,454	102	439	9,955	2,389
OTP Bank Serbia	155	287	24,180	2,686	153	301	32,040	2,664
Ipoteka Bank (Uzbekistan)	39	809	41,168	4,432	39	811	45,918	4,668
OTP Bank Ukraine (w/o employed agents)	70	172	348	2,129	68	167	373	2,205
CKB Group (Montenegro)	26	109	9,301	561	26	106	11,603	597
OTP Bank Albania	50	106	2,046	700	49	157	3,234	761
OTP Bank Moldova	51	161	0	875	52	173	1,398	882
OTP Bank Russia (w/o employed agents)	78	128	104	5,054	58	136	97	5,560
<b>Foreign subsidiaries, total</b>	<b>934</b>	<b>3,591</b>	<b>123,120</b>	<b>26,351</b>	<b>895</b>	<b>3,635</b>	<b>138,613</b>	<b>27,161</b>
Other Hungarian and foreign subsidiaries				768				802
<b>OTP Group (w/o employed agents)</b>				<b>38,523</b>				<b>39,695</b>
OTP Bank Russia – employed agents				1,694				1,057
OTP Bank Ukraine – employed agents				101				94
<b>OTP Group (aggregated)</b>	<b>1,251</b>	<b>5,522</b>	<b>293,828</b>	<b>40,317</b>	<b>1,196</b>	<b>5,622</b>	<b>288,771</b>	<b>40,845</b>

Definition of headcount number: closing, active FTE (full-time employee). The employee is considered as full-time employee in case his/her employment conditions regarding working hours are in line with a full-time employment defined in the Labour Code in the reporting entity's country. Part-time employees are taken into account proportional to the full-time working hours being effective in the reporting entity's country. The *other Hungarian and foreign subsidiaries*, and the *OTP Group* lines do not contain the headcount of agricultural businesses.

## STATEMENT ON CORPORATE GOVERNANCE PRACTICE

### Corporate governance practice

OTP Bank Plc., being registered in Hungary, has a corporate governance policy that complies with the provisions on companies of the act applicable (Civil Code). As the company conducts banking operations, it also adheres to the statutory regulations pertaining to credit institutions.

Beyond fulfilling the statutory requirements, as a listed company on the Budapest Stock Exchange (BSE), the company also makes an annual declaration on its compliance with the BSE's Corporate Governance Recommendations. After being approved by the General Meeting, this declaration is published on the websites of both the Stock Exchange ([www.bet.hu](http://www.bet.hu)) and the Bank ([www.otpbank.hu](http://www.otpbank.hu)).

### System of internal controls

OTP Bank Plc., as a provider of financial and investment services, operates a closely regulated and state-supervised system of internal controls.

OTP Bank Plc. has detailed risk management regulations applicable to all types of risks (credit, country, counterparty, market, liquidity, operational, compliance), which are in compliance with the regulations on prudent banking operations. The Bank Group pays special attention to the management of ESG risks and the implementation of climate protection aspects in business practice. Its risk management system extends to cover the identification of risks, the assessment and analysis of their impact, elaboration of the required action plans and the monitoring of their effectiveness and results. The business continuity framework is intended to provide for the continuity of services. Developed on the basis of international methodologies, the lifecycle model includes process evaluation, action plan development for critical processes, the regular review and testing of these, as well as related DRP activities.

As one of the internal lines of defence of priority importance, the independent internal audit unit of the OTP Bank Plc. assists in the legally compliant and effective management of assets and liabilities and the protection of property; it supports secure business operation, the effective operation of internal control systems, the minimisation of risks, and it also detects and reports differences and deviations from the provisions of the statutory regulations and internal policies and their underlying causes, makes recommendations for the elimination and prevention of deficiencies and for strengthening controls, and monitors the implementation of the measures. The independent internal audit annually and quarterly prepares group-level reports on control actions and audit results for the executive boards. Once a year, the independent internal audit with the prior opinion of the Audit Committee draws up, for the Supervisory Board, the Board of Directors and the Risk Assumption and Risk Management Committee, objective and independent reports in respect of the operation of risk management, internal control mechanisms and corporate governance functions. Furthermore, in line with the provisions of the Credit Institutions Act, reports, once a year, to the Supervisory Board and the Board of Directors on the regularity of internal audit tasks, professional requirements and the conduct of audits, and on the review of compliance with IT and other technical conditions needed for the audits.

In line with the regulations of the European Union, the applicable Hungarian laws and supervisory recommendations, OTP Bank Plc. operates an independent organisational unit with the task of identifying and managing compliance risks. The Compliance Directorate prepares a report quarterly to the Executive Steering Committee, the Risk Assumption and Risk Management Committee, the Board of Directors, and the Supervisory Board, about the Bank's and the Bank Group's compliance activities and position.

## IT controls

Applications are developed by either in-house group resources or by third parties. OTP Bank applies administrative, logical and physical control measures commensurate with the risk in order to protect the IT systems storing and processing data, as follows:

- access to data/systems is only possible on the basis of a predefined authorisation management process that applies the principle of least privilege, ensures segregation of responsibilities, that has regular access right reviews and ensures that dismissed employees' access is revoked in a timely manner;
- user authentication, authorisation and password management processes are controlled by policies and audited;
- the systems have test and development environments with appropriate separation from the production environments that have a secure change management procedure, which ensures that program developments or modifications can only be deployed to the operational environment after proper, controlled testing and approval;
- systems are protected by appropriate network perimeter protection, various security devices and network segmentation, furthermore all network communications are protected with state-of-the-art encryption;
- the IT systems that store and process data are regularly backed up and backup media is stored in controlled premises with adequate protection for long-term retention, and the organisation carries out regular backup restore tests;
- adequate redundancy is applied for IT systems that store and process data to ensure business continuity and disaster resiliency;
- has developed DRPs and BCPs for critical systems and critical business processes, which are regularly tested and reviewed;
- the Bank collects and retains the complete log of all major IT operations and IT security relevant data processing activities and the confidentiality, availability, integrity, authenticity and non-repudiation of these audit logs are ensured;
- there is a continuous, up-to-date protection against malicious codes;
- it ensures the regular implementation of vendor patches and updates for the environments used;
- it uses a data leakage protection (DLP) solution to reduce the risk of inadvertent data loss;
- it ensures the continuous monitoring of the operation events of the physical and virtual environment system elements with automated event detection and management tools;
- the above measures are documented at an appropriate level, which ensures the traceability of the implementation of data security requirements in a transparent manner;
- it ensures permanent secure deletion of the data stored on the media, the destruction of the media and the documentation of the destruction of the media during secure operational media disposal processes;
- it enforces data protection requirements already at the design stage of the implementation of the IT systems storing and processing personal data and of the systems operational processes related to them;
- acquire and maintain ability to adequately handle application related security events (including cyber threats), entailing prevention, detection, identification, isolation, analysis, recovery and reporting;
- remote work is regulated in a controlled and documented way, remote device and user access is protected with multi-factor authentication;
- ensures IT security compliance by its managed regulative framework;
- revision and update of IT security regulations bi-yearly or in a frequency complying legislative requirements or upon major changes;
- ensures vulnerability assessments and penetration tests are carried out as planned;
- defines pools for categorization of installed software into preferred, allowed and prohibited and ensures compliance to that policy.
- it ensures that its employees have adequate knowledge of data protection requirements and provides regular data protection and information security awareness training for them.

## General Meeting

The General Meeting is the supreme governing body of OTP Bank Plc. The regulations pertaining to its operation are set forth in the Company's Articles of Association, and comply fully with both general and special statutory requirements. Information on the General Meeting is available in the Corporate Governance Report.

### Regulations and information to be presented in the Business Report concerning securities conferring voting rights issued by the Company and senior officials, according to the effective Articles of Association, and ownership structure

The Company's registered capital is HUF 28,000,001,000, that is twenty-eight thousand million one thousand Hungarian forint, divided into 280,000,010 that is Two hundred and eighty million and ten dematerialised ordinary shares with a nominal value of HUF 100 each, and a total nominal value of HUF 28,000,001,000, that is twenty-eight billion one thousand Hungarian forint.

The ordinary shares of the Company specified all have the same nominal value and bestow the same rights in respect of the Company.

There are no restrictions in place concerning the transfer of issued securities constituting the registered capital of the Company.

No securities with special control rights have been issued by the Company.

Special Employee Partial Ownership Plan Organization No. I. of OTP Employees and Special Employee Partial Ownership Plan Organization No. II. of OTP Employees (hereinafter referred to as: OTP SEPOPs) were established based on the decision of the Company's certain employees and executives considered as employees pursuant to the Act XLIV of 1992 on Employee Partial Ownership Plan. Management rights of OTP SEPOPs are exercised by a trust named *Alapítvány az OTP Munkavállalók Különleges Résztulajdonosi Programjáért*, founded by the same employees setting up OTP SEPOPs. The Company did not participate either in foundation or in management of OTP SEPOPs.

The Company in line with the ESOP Act initiated an employee share ownership plan having a remuneration purpose and founded OTP Bank ESOP Organization for its execution (hereinafter referred to as ESOP Organization). Pursuant to the laws, the management rights over the ESOP Organization are exercised by a law firm, the so called trustee. In the case of the ESOP Organization Szűcs Law Firm is entitled to exercise the authorities of the trustee. The Company participated in the foundation of the ESOP Organization, however, after its foundation it cannot participate in its management, and according to the laws, it is not entitled to either give orders or to recall the trustee.

Rules on the restrictions of the voting rights:

The Company's ordinary shares confer one vote per share.

An individual shareholder or group of shareholders may not exercise voting rights in respect of in an extent exceeding 25%, or – if the voting rights of another shareholder or group of shareholders exceed 10% – exceeding 33% of the total voting rights represented by the shares conferring voting rights at the Company's General Meeting.

The shareholder is obliged to notify the Company's Board of Directors without delay if the shareholder directly or indirectly, or together with other shareholders in the same group of shareholders, holds more than 2% of the voting rights represented by the shares conferring voting rights at the Company's General Meeting. Concurrently with this, the shareholder is obliged to designate the shareholders through which the indirect voting right exists, or the members of the group of shareholders. In the event of a failure to provide such notification, or if there are substantive grounds for assuming that the shareholder has made a misleading declaration regarding the composition of the shareholder group, then the shareholder's voting right shall be suspended and may not be exercised until the shareholder has met the above obligations. The notification obligation stipulated in this paragraph and the related legal consequences are also incumbent upon individuals who are classified or may be classified as the Company's shareholders under Article 61 of the Capital Markets Act. The Company must also be provided with proof of the conditions for exemption from the notification obligation in accordance with Section 61 (7)-(8) and (11) and Section 61 (10), (11a) and (12), of the Capital Markets Act.

Shareholder group: the shareholder and another shareholder, in which the former has either a direct or indirect shareholding or has an influence without a shareholding (collectively: a direct and/or indirect influence); furthermore: the shareholder and another shareholder who is exercising or is willing to exercise its voting rights together with the former shareholder, regardless of what type of agreement between the participants underlies such concerted exercising of rights.

For determining the existence and extent of the indirect holding, the rules of the Credit Institutions Act relating to the calculation of indirect ownership shall be applied.

If the voting rights that may be exercised by a shareholder group exceed the threshold stipulated above, the voting rights shall be reduced in such a way that the voting rights relating to the shares most recently acquired by the group of shareholders shall not be exercisable.

If there are substantive grounds to presume that the exercising of voting rights by any shareholder or shareholders might result in a breach of the rules of the Capital Markets Act relating to the acquisition of a controlling interest, the Board of Directors' authorised representative responsible for the registration of shareholders at the venue of the General Meeting, or the Chairman of the General Meeting, may exclude the affected shareholders from attending the General Meeting or exercising voting rights.

The General Meeting has exclusive authority with respect to the following matters:

- a. changes to the rights associated with specific series of shares, or the transformation of certain categories or classes of shares; (qualified majority)
- b. the decision regarding the delisting of the shares (qualified majority). When making the decisions, shares embodying multiple voting rights shall represent one share.

The Company is not aware of any kind of agreements among the owners that could give rise to the restriction of the transfer of issued securities and/or the voting rights.

Rules on the appointment and removal of executive officers, and rules on amendment of the Articles of Association:

The Board of Directors has at least 5, and up to 11 members.

When making the decisions, shares embodying multiple voting rights shall represent one share. The members of the Board of Directors are elected by the General Meeting based on its decision uniformly either for an indefinite period or for five years; in the latter case the mandate ends with the General Meeting concluding the fifth financial year following the election. The mandate of a member elected during this period expires together with the mandate of the Board of Directors.

The Board of Directors elects a Chairman and may elect one or more Deputy Chairmen, from among its own members, whose period of office shall be equal to the mandate of the Board of Directors. The Chairman of the Board of Directors is also the Chief Executive Officer (Chairman & CEO) of the Company, unless the Board of Directors decides within its competence that the position of Chairman of the Board of Directors and the Chief Executive Officer of the Company are held by separate persons.

The membership of the Board of Directors ceases to exist by

- a. expiry of the mandate,
- b. resignation,
- c. recall,
- d. death,
- e. the occurrence of grounds for disqualification as regulated by law.
- f. termination of the employment of internal (executive) Board members.

The General Meeting has exclusive authority with respect to the following matters:

- the recall of members of the Board of Directors, the Supervisory Board and Audit Committee, and of the auditor; (qualified majority)

More than one third of the members of the Board of Directors and the non-executive members of the Supervisory Board may be recalled within a 12-month period only if any shareholder holds more than 33% of the shares issued by the Company, which have been obtained by the shareholder by way of a public purchase offer.

- except in the cases referred by these Articles of Association to the authority of the Board of Directors, the establishment and amendment of the Articles of Association; (qualified majority); the General Meeting decides on proposals concerning the amendment of the Articles of Association – based on a resolution passed by shareholders with a simple majority – either individually or en masse.

The Board of Directors is obliged to

- prepare the Company's financial statements in accordance with the Accounting Act, and make a proposal for the use of the profit after taxation;
- prepare a report once a year for the General Meeting, and once every three months for the Supervisory Board, concerning management, the status of the Company's assets and business policy;
- provide for the proper keeping of the Company's business books;
- perform the tasks referred to its authority under the Credit Institutions Act, in particular:
  - ensuring the integrity of the accounting and financial reporting system;
  - elaborating the appropriate strategy and determining risk tolerance levels for each business unit concerned;
  - setting risk assumption limits;
  - providing the necessary resources for the management or risk, the valuation of assets, the use of external credit ratings and the application of internal models.

The following, in particular, come under the exclusive authority of the Board of Directors:

- election of the Chairman & Chief Executive Officer of the Company, and exercising employer's right in respect thereof;
- election of one or more Deputy Chairmen of the Board of Directors;
- determination of the annual plan;
- the analysis and assessment of the implementation of business-policy guidelines, on the basis of the Company's quarterly balance sheet;
- decisions on transactions referred to the authority of the Board of Directors by the Company's organisational and operational regulations;
- decision on launching, suspending, or terminating the performance of certain banking activities within the scope of the licensed activities of the Company;
- designation of the employees entitled to sign on behalf of the Company;
- decision on the increasing of registered capital at the terms set out in the relevant resolution of the General Meeting;
- decision to acquire treasury shares at the terms set out in the relevant resolution of the General Meeting;
- decision on approving internal loans in accordance with the Credit Institutions Act;
- decision on the approval of regulations that fundamentally determine banking operations, or are referred to its authority by the Credit Institutions Act. The following shall qualify as such regulations:
  - the collateral evaluation regulations,
  - the risk-assumption regulations,
  - the customer rating regulations,
  - the counterparty rating regulations,
  - the investment regulations,
  - the regulations on asset classification, impairment and provisioning,
  - the organisational and operational regulations, which contain the regulations on the procedure for assessing requests related to large loans,
  - the regulations on the transfer of signatory rights;
- the decision on approving the Rules of Procedure of the Board of Directors;
- decision on steps to hinder a public takeover procedure;
- decision on the acceptance of a public purchase offer received in respect of treasury shares;
- decision on the commencement of trading in the shares in a regulated market (flotation);
- decision on the cessation of trading in the shares in a given regulated market, provided that the shares are traded in another regulated market (hereinafter: transfer).

The Board of Directors is exclusively authorised to:

- decide, in the cases specified in the Civil Code, on acceptance of the Company's interim balance sheet, subject to the prior approval of the Supervisory Board;
- decide, instead of the General Meeting, to pay an advance on dividends, subject to the preliminary approval of the Supervisory Board;
- make decisions regarding any change in the Company's name, registered office, permanent establishments and branches, and in the Company's activities – with the exception of its core activity – and, in relation to this, to modify the Articles of Association should it become necessary to do so on the basis of the Civil Code or the Articles of Association;
- make decision on mergers (if, according to the provisions of the law on the transformation, merger and demerger of legal entities, the approval of the General Meeting is not required in order for the merger to take place).

The Board of Directors directly exercises employer's rights in respect of the Chairman & CEO. The person affected by a decision may not participate in the decision making. Employer rights in respect of the executive directors of the Company are exercised by the Board of Directors through the Chairman & CEO, with the proviso that the Board of Directors must be notified in advance of the appointment and dismissal of the Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the Chief Executive Officer and by the senior company employees defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors. If the Chairman of the Board of Directors and the CEO are different persons, the employer rights in respect of the other executive directors of the Company (CEO, deputy CEOs) are exercised by the Board of Directors through the Chairman of Board of Directors, with the proviso that the Board of Directors shall be notified in advance of the appointment and dismissal of the CEO and Deputy CEOs. With regard to issues related to the exercising of employer's rights in respect of employees, the Company is represented by the persons defined in the Organisational and Operational Regulations of the Company, in accordance with the delegation of authority approved by the Board of Directors.

The Board of Directors may delegate, to individual members of the Board of Directors, to executive directors employed by the Company, and to the heads of the individual service departments, any task that does not come under the exclusive authority of the Board of Directors in accordance with these Articles of Association or a General Meeting resolution.

The Company may acquire treasury shares in accordance with the rules of the Civil Code. The prior authorisation of the General Meeting is not required for the acquisition of treasury shares if the acquisition of the shares is necessary in order to prevent a direct threat of severe damage to the Company (this provision is not applicable in the event of a public purchase offer aimed at buying up the Company's shares), as well as if the Company acquires the treasury shares in the context of a judicial procedure aimed at the settlement of a claim to which the Company is entitled, or in the course of a transformation.

The Company has not made agreements in the meaning of points (j) and (k) in paragraph 95/A of Act No. C of 2000 on Accounting.

## OWNERSHIP STRUCTURE, SHAREHOLDING AND VOTING PROPORTION

Description of owner	Total registered capital					
	1 January 2025			31 December 2025		
	Ownership share	Voting rights <sup>1</sup>	Number of shares	Ownership share	Voting rights <sup>1</sup>	Number of shares
Domestic institution/company	31.57%	32.39%	88,395,584	30.26%	31.90%	84,722,909
Foreign institution/company	54.53%	55.94%	152,679,265	54.37%	57.32%	152,240,896
Domestic individual	10.31%	10.58%	28,878,581	9.08%	9.57%	25,423,825
Foreign individual	0.36%	0.37%	998,943	0.48%	0.51%	1,343,306
Employees, senior officers	0.51%	0.53%	1,435,703	0.50%	0.53%	1,402,070
Treasury shares <sup>2</sup>	2.52%	0.00%	7,049,823	5.15%	0.00%	14,416,678
Government held owner	0.05%	0.05%	139,036	0.05%	0.05%	137,646
International Development Institutions	0.00%	0.00%	3,251	0.04%	0.04%	118,028
Other <sup>3</sup>	0.15%	0.15%	419,824	0.07%	0.07%	194,652
<b>TOTAL</b>	<b>100.00%</b>	<b>100.00%</b>	<b>280,000,010</b>	<b>100.00%</b>	<b>100.00%</b>	<b>280,000,010</b>

<sup>1</sup> Voting rights in the General Meeting of the Issuer for participation in decision-making.

<sup>2</sup> Treasury shares do not include the OTP shares held by ESOP (OTP Bank Employee Stock Ownership Plan Organization). Pursuant to Act V of 2013 on the Civil Code, OTP shares held by the ESOP are not classified as treasury shares, but the ESOP must be consolidated in accordance with IFRS 10 Consolidated Financial Statements standard. On 31 December 2025 ESOP owned 11,714,581 OTP shares.

<sup>3</sup> Non-identified shareholders according to the shareholders' registry.

## NUMBER OF TREASURY SHARES HELD IN THE YEAR UNDER REVIEW (2025)

	1 January	31 March	30 June	30 September	31 December
OTP Bank	7,049,823	9,708,441	10,439,982	12,405,462	14,416,678
Subsidiaries	0	0	0	0	0
<b>TOTAL</b>	<b>7,049,823</b>	<b>9,708,441</b>	<b>10,439,982</b>	<b>12,405,462</b>	<b>14,416,678</b>

SHAREHOLDERS WITH OVER/AROUND 5% STAKE (AS AT THE END OF PERIOD)<sup>1</sup>

Name	Nationality <sup>2</sup>	Activity <sup>3</sup>	Number of shares	Ownership <sup>4</sup>	Voting rights <sup>4,5</sup>	Notes <sup>6</sup>
<b>MOL (Hungarian Oil and Gas Company Plc.)</b>	<b>D</b>	<b>C</b>	<b>24,000,000</b>	<b>8.57%</b>	<b>9.04%</b>	
<b>Groupama Group</b>	<b>F/D</b>	<b>C</b>	<b>14,268,600</b>	<b>5.10%</b>	<b>5.37%</b>	
Groupama Gan Vie SA	F	C	14,140,000	5.05%	5.32%	
Groupama Biztosító Ltd.	D	C	128,600	0.05%	0.05%	
<b>OTP Bank Plc.</b>	<b>D</b>	<b>C</b>	<b>14,416,678</b>	<b>5.15%</b>	<b>0.00%</b>	

<sup>1</sup> As a result of transactions concluded on April 9, 2025, the combined voting rights of Special Employee Partial Ownership Plan Organization No. I. and No. II. of OTP Employees (together referred to as the OTP Special Employee Partial Ownership Plan Organizations) in OTP Bank Plc. increased to 5.02%, corresponding to 13,568,641 ordinary shares. However, by the end of December 2025, their ownership interest was below the 5% threshold and, consequently, they were not included in this table. At the end of 4Q 2025, their combined voting right reached 5.15%.

<sup>2</sup> Domestic (D), Foreign (F).

<sup>3</sup> Custodian (CU), Public Institution (PU), International Development Institutions (ID), Institutional (I), Company (C), Private (PR), Employee or senior officer (E).

<sup>4</sup> Rounded to two decimals.

<sup>5</sup> Voting rights in the General Meeting of the Issuer for participation in decision-making.

<sup>6</sup> Eg. professional investor, financial investor, etc.

## SENIOR OFFICERS, STRATEGIC EMPLOYEES AND THEIR SHAREHOLDING OF OTP SHARES

as at 31 December 2025

Type <sup>1</sup>	Name	Position	Commencement date of the term	Expiration/termination of the term	Number of shares
IG	dr. Sándor Csányi <sup>2</sup>	Chairman	15/05/1992	2026	141,800
IG	Tamás Erdei	Deputy Chairman	27/04/2012	2026	70,485
IG	Gabriella Balogh	member	16/04/2021	2026	36,993
IG	Mihály Baumstark	member	29/04/1999	2026	63,400
IG	Péter Csányi	member, CEO	16/04/2021	2026	74,440
IG	dr. István Gresá <sup>3</sup>	member	27/04/2012	2026	38,400
IG	Antal Kovács	member	15/04/2016	2026	101,932
IG	György Nagy <sup>4</sup>	member	16/04/2021	2026	17,800
IG	dr. Márton Gellért Vági	member	16/04/2021	2026	29,500
IG	dr. József Vörös	member	15/05/1992	2026	214,514
IG	László Wolf	member, Deputy CEO	15/04/2016	2026	560,038
FB	Tibor Tolnay	Chairman	15/05/1992	2026	54
FB	dr. Gábor Horváth	Deputy Chairman	19/05/1995	2026	0
FB	Klára Bella	member	12/04/2019	2026	1,010
FB	dr. Tamás Gudra	member	16/04/2021	2026	0
FB	András Michnai	member	25/04/2008	2026	1,410
FB	Catherine Paule Granger-Ponchon	member	25/04/2025	2026	0
SP	András Becsei	Deputy CEO			15,000
SP	László Bencsik	Deputy CEO			5,000
SP	András Sebők	Deputy CEO			0
SP	György Kiss-Haypál	Deputy CEO			12,299
SP	Imre Bertalan	MC member			0
SP	dr. Bálint Csere	MC member			15,745
SP	dr. Zoárd Gázmár	MC member			2,250
<b>TOTAL No. of shares held by management</b>					<b>1,402,070</b>

<sup>1</sup> Board Member (IG), Supervisory Board Member (FB), Employee in strategic position (SP)

<sup>2</sup> Number of OTP shares owned by dr. Sándor Csányi, Chairman, directly or indirectly: 5,341,800.

<sup>3</sup> Number of OTP shares owned by Istvan Gresá, Member of Board of Directors, directly or indirectly: 204,658.

<sup>4</sup> Number of OTP shares owned by György Nagy, Member of Board of Directors, directly or indirectly: 951,800.

## Committees<sup>5</sup>

### Members of the Board of Directors

Dr. Sándor Csányi – Chairman  
 Mr. Tamás Erdei – Deputy Chairman  
 Ms. Gabriella Balogh  
 Mr. Mihály Baumstark  
 Mr. Péter Csányi  
 Dr. István Gresa  
 Mr. Antal Kovács  
 Mr. György Nagy  
 Dr. Márton Gellért Vági  
 Dr. József Vörös  
 Mr. László Wolf

### Members of the Supervisory Board

Mr. Tibor Tolnay – Chairman  
 Dr. József Gábor Horváth – Deputy Chairman  
 Ms. Klára Bella  
 Dr. Tamás Gudra  
 Mr. András Michnai  
 Mr. Olivier Péqueux<sup>6</sup>  
 Ms. Catherine Paule Granger-Ponchon<sup>7</sup>

### Members of the Audit Committee

Dr. József Gábor Horváth – Chairman  
 Mr. Tibor Tolnay – Deputy Chairman  
 Dr. Tamás Gudra  
 Mr. Olivier Péqueux<sup>6</sup>  
 Ms. Catherine Paule Granger-Ponchon<sup>7</sup>

The résumés of the committee and board members are available in the Corporate Governance Report/Annual Report.

## Personal changes

On 25 April 2025, at the General Meeting of the Bank, Dr. Sándor Csányi informed the shareholders that, at his initiative, the Board of Directors decided to separate the positions of Chairman and CEO of OTP Bank Plc. with effect from 1 May 2025. Dr. Sándor Csányi will continue to perform the strategic management tasks of the OTP Group as Chairman of the Board of Directors. The Board of Directors appointed Péter Csányi to the position of CEO for an indefinite period.

On 25 April 2025, the Annual General Meeting elected Catherine Paule Granger-Ponchon as a new member of the Supervisory Board of OTP Bank Plc., replacing Olivier Péqueux as an independent member of the board, representing the Groupama Group. Her appointment will last until the date of the Company's Annual General Meeting closing the 2025 business year, but no later than 30 April 2026.

On 25 April 2025, the Annual General Meeting elected Catherine Paule Granger-Ponchon as a new member of the Audit Committee of OTP Bank Plc., replacing Olivier Péqueux as an independent member of the board, representing the Groupama Group. Her appointment will last until the date of the Company's Annual General Meeting closing the 2025 business year, but no later than 30 April 2026.

On 25 April 2025, the Annual General Meeting concerning the audit of OTP Bank Plc.'s separate and consolidated annual financial statements in accordance with International Financial Reporting Standards for the year 2025, the Annual General Meeting elected Ernst & Young Ltd. (001165, H-1132 Budapest, Váci út 20.) as the Company's auditor from 1 May 2025 until 30 April 2026.

On 25 April 2025, the Annual General Meeting elected Ernst & Young Ltd. (001165, H-1132 Budapest, Váci út 20.) for the audit of the Company's sustainability reports for the 2025 business year to provide assurance at the general meeting approving the report for the 2025 business year, but no later than 30 April 2026.

Effective from 1 August 2025 Mr. András Sebők was appointed as deputy Chief Executive Officer to run the Digital Division.

<sup>5</sup> Personal changes can be found in the „Personal and organizational changes” chapter.

<sup>6</sup> Until 25 April 2025

<sup>7</sup> As of 25 April 2025

## Operation of the executive boards

OTP Bank Plc. has a dual governance structure, in which the Board of Directors is the Company's executive management body in its managerial function, while the Supervisory Board is the management body in its supervisory function of the Company. It controls the supervision of the lawfulness of the Company's operation, its business practices and management, performs oversight tasks and accepts the provisions of the Bank Group's Remuneration Policy. The effective operation of Supervisory Board is supported by the Audit Committee, as a committee, which also monitors the internal audit, the risk management, the reporting systems and the activities of the auditor.

In order to assist the performance of the governance functions the Board of Directors founded and operates, as permanent or other committees, such as the Management Committee, the Executive Steering Committee, the Remuneration Committee, the Nomination Committee and the Risk Assumption and Risk Management Committee.

To ensure effective operation OTP Bank Plc. also has a number of further permanent committees.

OTP Bank Plc. gives an account of the activities of the executive boards and the committees every year in its Corporate Governance Report.

The Board of Directors held 7, the Supervisory Board held 7 meetings, while the Audit Committee held 2 meetings in 2025. In addition, resolutions were passed by the Board of Directors on 183, by the Supervisory Board on 91 and by the Audit Committee on 31 occasions by written vote.

## Policy of diversity

OTP Bank Plc. determines and regulates the criteria for the selection of senior executives in line with European Union as well as domestic legal requirements and directives fundamentally determining the operation of credit institutions.

When designating members of the management bodies (Board of Directors, Supervisory Board) as well as appointing members of the Board of Directors and administrative members (Management), OTP Bank Plc. considers the existence of professional preparation, the high-level human and leadership competence, the versatile educational background, the widespread business experience and business reputation of the utmost importance, at the same time, it is also highly committed to taking efficient measures in order to ensure diversity with regard to corporate operation, including the gradual improvement in women's participation rate.

OTP Bank Plc.'s Nomination Committee continuously keeps tracking the European Union and domestic legislation relating to women's quota on its agenda, in that when unambiguously worded expectations are announced, it promptly takes the necessary measures. In accordance with OTP Bank Plc.'s currently approved strategy, the goal is to have at least one female member in both the Board of Directors and the Supervisory Board.

It is important to note, however, that, as a public limited company, the selection of the members of the management bodies falls within the exclusive competence of the General Meeting upon which – beyond its capacity to designate enforcing the above aspects to maximum effect – OTP Bank Plc. has no substantive influence.

According to OTP Bank Plc.'s Articles of Association, a Board of Directors comprising 5-11 members and a Supervisory Board comprising 5-9 members are set up at OTP Bank Plc. Currently the Board of Directors operates with 11 members and has one female member, the Supervisory Board comprises 6 members and has one female member. The management of OTP Bank Plc. currently comprises 6 members and has no female member.

## Fight against corruption and against the practice of bribery

The Code of Ethics ([https://www.otpbank.hu/static/portal/sw/file/OTP\\_EtikaiKodex\\_EN.pdf](https://www.otpbank.hu/static/portal/sw/file/OTP_EtikaiKodex_EN.pdf)), the Partner Code of Ethics ([https://www.otpbank.hu/static/portal/sw/file/OTP\\_Partneri\\_EtikaiKodex\\_EN.pdf](https://www.otpbank.hu/static/portal/sw/file/OTP_Partneri_EtikaiKodex_EN.pdf)) published in 2023 and the Anti-Corruption Policy of OTP Bank Group, approved in 2019, contains provisions on the fight against corruption and against the practice of bribery, as well as the enforcement of legal, fair and ethical conduct (<https://www.otpgroup.info/ethical-declaration>). As it can be read in the foreword of the Code and the Anti-Corruption Policy as well, the OTP Bank Plc. and its management have adopted the principle of zero tolerance towards corruption and bribery, taking a definite stance against all forms of corruption and giving full support to the fight against corruption. In addition, the Code states that "As an ethical and compliant institution, the Bank and its management are fully committed to ensuring observance of all relevant legislation, including anti-corruption statutes." The OTP Bank Plc. has set up an ethics reporting system (whistleblowing), which is for the reporting and the handling of the reports on suspected or actual violation of the values set forth in the Code of Ethics, where anonymous reporting of ethics issues is also possible. The OTP Bank Plc. conducts inquiries for the purpose of detecting, preventing anomalies in connection with reports made or anomalies it became aware of otherwise.

In 2025, a total of 244 reports were received through the ethics Whistleblowing System of OTP Bank Plc., of which 50 reports were deemed necessary to conduct ethics proceedings. Ethical breaches were identified in 10 cases.

The OTP Bank Plc. has created and maintains its Code of Ethics to keep reputational risk and financial losses, which may incur in relation to corruption, bribery and discrimination, on a minimum level. Both employees and newcomers receive education on the Code of Ethics, and in addition, the acceptance to be bound by it is a prerequisite for their employment.

In addition, all business partners and clients are communicated about the Anti-Corruption Policy and procedures through the Code of Ethics and Anti-Corruption Policy published publicly on the OTP Bank Plc.'s website and from 2023 the Partner Code of Ethics has been published on the Bank's website as well. The Anti-Corruption Policy stipulates that, in view of the fact that existing and established relationships with contractual partners also contain the possibility of corruption, the OTP Bank Plc. will act prudently in its dealings with contractors, in particular in the tendering and preparation process, to minimise the risk of corruption. The OTP Bank Plc. establishes relationships with its contractual partners based on an assessment of professionalism, competence and competitiveness, and does not apply other non-professional selection criteria that contain the possibility of corruption.

Based on the Compliance's proposal, the prohibition of corruption will be reflected in the contractual and regulatory documents used by the OTP Bank Plc. in a clearer and well-defined manner from 2023 onwards, through the inclusion of anti-corruption clauses in the business rules and standard contracts. The clause will state from the very beginning of the business relationship that the contracting partner accepts OTP Bank Plc.'s anti-corruption principles, including the prohibition of corruption and the consequences of breaching this prohibition, which can even be termination of contract.

Any requests from third parties affecting human rights are treated by the OTP Bank Plc. as a priority.

We manage the risks regarding the fight against corruption and bribery within the framework of our operational risk management process. Our quarterly compliance reports cover the changes in risks as well as the steps necessary to manage them. The reports are presented to the Executive Steering Committee and the Board of Directors; the annual report is also submitted to the Supervisory Board.

## Non-financial performance indicators

- **Internal audit:** 251 closed audits, 1,763 recommendations, 1,759 accepted recommendations.
- **Compliance with Budapest Stock Exchange (BSE) Recommendations (yes/no ratio):** 72 yes, 0 no.
- **Bank security investigations, reports:** In 2025, we filed 719 police reports, of which 590 were related to suspected fraud committed to the detriment of customers.

Related to financial abuses, in the segment of retail loans, a loss of HUF 59 million occurred in 2025. A detailed comparison of losses from credit fraud cases in 2025 to those in 2024 shows that losses from cash loan fraud amounted to HUF 39.2 million, while in 2025, this amount decreased to HUF 9.2 million; losses from POS loan fraud cases in 2024 amounted to HUF 1.2 million, while in 2025 no losses were registered from POS loan fraud.

Regarding overdraft, housing loan and state-subsidised family housing allowance (CSOK) applications in 2024 and 2025 no losses were registered due to fraudulent activity. In respect of the Baby Loan Program, the expected losses in 2025 amounted to HUF 11 million, while no such losses were registered in 2024.

In the case of corporate loan fraud, taking into account the SME and corporate segments, in the SME losses increased to HUF 3.1 billion in 2025 (in 2024 the bank's loss amounted to HUF 1.2 billion). As a result of the security screening of submitted applications, due to the suspicion of fraud, several submitted loan applications were rejected, thereby preventing HUF 3.3 billion in potential loss.

With regard to fraud committed to the detriment of the Bank's customers in the online space in 2025, losses resulting from successful payment fraud amounted to HUF 3.5 billion, which is 51.3% lower than in the previous year due to the Bank's security measures. The number of completed fraud cases totalled 6,466, representing a 25.8% decrease compared to the previous year.

In addition, regarding the losses caused to the Bank's customers, as much as HUF 18.8 billion in losses was prevented, owing to the implemented measures, a significant part of which was due to rules implemented for the purpose of blocking access attempts to the customers' accounts, as a result of which as much as HUF 15.8 billion was saved on the customers' accounts.

In 2025 with the implemented measures, 84.3% of potential customer losses were successfully prevented and this is 9.1 pps higher than in 2024, when 75.2% of potential losses were prevented. With the implemented measures and by increasing the efficiency of the monitoring system, this rate could be drastically improved.

- **Bank card security:** compared to 2024 data, a significant decrease can be perceived in bank card fraud, in both the number of fraud attempts and the loss value of successful fraud. In 2025 the loss from successful bank card fraud cases amounted to HUF 2.1 billion, constituting a nearly 40% decrease. Of this amount, losses from successful transactions with bank cards issued by the Bank amounted to HUF 1.7 billion, which, compared to the data from 2024, is a decrease of almost 48%.
- **Ethics issues:** 244 ethics reports, establishing ethics offences in 10 cases.

# OTP GROUP'S SUSTAINABILITY REPORT 2025

## 1 General information

### 1.1 Basis for preparation of the report

#### 1.1.1 [BP-1] General basis for preparation of the sustainability statement

OTP Bank Plc (the "Bank" or "OTP Bank") publishes its consolidated level Sustainability Statement<sup>8</sup> for the financial year 2025 (covering the reporting period of 01.01.2025 - 31.12.2025). OTP Group's (the "Group", the "Bank and its subsidiaries") Sustainability Statement was prepared in alignment with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (hereinafter referred as ESRS), including disclosures under Article 8 of EU Regulation 2020/852 (hereinafter referred as EU Taxonomy Regulation).

Section 134/J (1) of the Hungarian Accounting Law requires that the Company must prepare its consolidated business report including the consolidated sustainability statement in the electronic reporting format (XHTML) set out in Commission Delegated Regulation (EU) 2019/815 (ESEF Regulation), and the sustainability disclosures defined by the ESEF taxonomy, including those required according to the EU Taxonomy Regulation, must be tagged in the consolidated sustainability statement using the XBRL markup language. Given that the ESEF taxonomy for sustainability reporting has not been adopted yet, the Company was unable to carry out the XBRL tagging.

OTP Group's subsidiaries are referred in the report as following:

- OTP Bank (the "Bank"): OTP Bank Plc.
- OTP Group (the "Group"): OTP Bank Plc. and its subsidiaries
- OTP Group's financial segment: OTP Group's financial service provider subsidiaries (financial subsidiaries)
- OTP banking group (the "Banking group"): OTP Bank and banking subsidiaries (focusing on a dedicated segment of financial subsidiaries)
- OTP Group's agricultural segment: OTP Group's agricultural subsidiaries

Disclosures in the sustainability statement involves OTP Bank Plc and its subsidiaries (the "OTP Group"). The scope of the reporting entities in the consolidated sustainability statement is the same as in the consolidated financial statement (*Companies involved in the scope of consolidation Supplementary Data chapter* of the consolidated financial statement in the Integrated Annual Report 2025) by implementing the accounting consolidation principles of OTP Group (*Note 2.3 – Principles of consolidation* of the consolidated financial statement in the Integrated Annual Report 2025), unless otherwise specified in the accounting policies within topical ESRS disclosure (please see further details in subchapter E1-6).

Under Article 19a(9) or Article 29a(8) of Directive 2013/34/EU and Directive (EU) 2025/794, the following subsidiaries are exempt from individual or consolidated sustainability reporting:

- DSK Bank AD<sup>9</sup>
- OTP banka d.d.<sup>10</sup>
- OTP banka Hrvatska dioničko društvo<sup>11</sup>
- Merkantil Group<sup>12</sup>

OTP Group has considered value chain perspective through its double materiality assessment (DMA 2025) by defining core own operation segments and related upstream and downstream activities and actors. Based on the value chain analysis of the Group's main operational segments, impacts, risks and opportunities (IROs) that could relate to material value chain activities and actors were identified and evaluated in the DMA process.

<sup>8</sup> Sustainability Statement according to Act C of 2000 on Accounting (Hungarian implementation of CSRD)

<sup>9</sup> DSK Group and subsidiaries

<sup>10</sup> OTP Bank Slovenia and subsidiaries

<sup>11</sup> OTP Bank Croatia and subsidiaries

<sup>12</sup> Merkantil Bank and subsidiaries

The extent to which policies, actions, targets, and metrics cover the value chain is presented at the relevant disclosure requirements. Regarding metrics, disclosure requirement, E1-6 includes information on the value chain: gross and total GHG<sup>13</sup> emissions for Scopes 1, 2, and 3.

OTP Group has not omitted any specific information corresponding to intellectual property, know-how, or innovation results, and has not utilized the exemption from disclosing information on imminent developments or matters under negotiation.

### 1.1.2 [BP-2] Disclosures in relation to specific circumstances

For FY25, the Group has reconsidered timeframes that were settled in the previous reporting period and decided to implement new time horizons in accordance with ESRS 1 (short-, medium-, and long-term) in the double materiality assessment and for reporting purposes as well.

Time periods defined by OTP Group in 2025:

- Short term: 0-1 years
- Medium term: 1-5 years
- Long term: 5+ years<sup>14</sup>

Information on estimates using indirect sources related to the value chain, the basis of preparation, the level of accuracy, and where applicable measures planned to improve accuracy of these estimations, are presented alongside the relevant metric (@1.5. Disclosure Requirements in ESRS covered by the undertaking's sustainability statement and general reporting policy) in the report. OTP Group strives to improve quality of the input data behind its financed GHG emission estimates.

#### Sources of estimation and outcome uncertainty

Identified significant measurement uncertainties, information on the sources of measurement uncertainties, and assumptions, approximations, and judgments used in the measurement, are also presented alongside the relevant quantitative metrics. Forward-looking information always carries a certain degree of uncertainty, which is not separately disclosed. To ensure the reliability of the report, the aim is to avoid presenting information affected by significant uncertainty – if this is not possible or advisable due to ESRS requirements, the fact of significant uncertainty is disclosed.

The Group has applied estimation in the calculation of the following metrics:

Metric	Sources of measurement uncertainty	Assumptions, approximations and judgements applied
Scope 1-2 GHG emissions	For certain Scope 1 and 2 emission sources, where actual consumption data were not available at the time of report preparation due to delayed invoicing by utility and service providers, emissions were calculated based on estimated consumption data, using historical consumption patterns and available contractual information.	OTP Group's Scope 1-2 emissions calculation method is presented in subchapter Reporting Policy of the Environmental information chapter.
Scope 3 GHG emissions, category 15 financed emissions	Although the estimation methods applied are consistent with prevailing industry practices, the reliance on external data sources introduces inherent measurement uncertainty. This is primarily due to the limited availability of high-quality counterparty emissions data and the use of generalized estimates rather than precise, counterparty-specific values. As a result, the calculated metrics should be interpreted with consideration of these limitations.	OTP Group's Scope 3 financed emissions calculation method is presented in subchapter Reporting Policy of the Environmental information chapter.

In case there is a methodological change OTP Group's approach is to publish revised comparative figures when it can be produced with reasonable effort and, based on reasonable assumptions, and the resulting change is capable of influencing users' decisions derived from the sustainability statement. Changes resulting solely from revisions of estimates will not be applied or disclosed retrospectively.

<sup>13</sup> Greenhouse Gas

<sup>14</sup> In case of risk assessment, the long-term time horizon is limited up to 10 years, as there is a high degree of uncertainty in risk management and business forecasts over this period.

A prior-period error is considered material if, based on professional judgment it is reasonable to assume that the error could influence the decisions of the users of the sustainability statements. In case of error OTP Group would publish the revised comparative figures when it can be produced with reasonable effort and, based on reasonable assumptions.

OTP Group has restated comparative data from previous reporting period for the following disclosures:

The method for calculating percentage ratios of nuclear energy and fossil gas-related activities has changed in the 2025 report. Detailed description is available in the EU Taxonomy Additional disclosure: Mandatory templates for Nuclear Energy and Fossil gas-related activities subchapter.

In 2025, the green mortgage definition was refined and approved by the ESG Committee. Due to changes in OTP Group's green retail loan definition, the 2024 figures were recalculated to ensure year-on-year comparability, based on the updated definition and improved data quality. The recalculated data are disclosed in the [E1-3] subchapter, while the updated definition is presented in the reporting policy for Chapter E and in the Voluntary Green Portfolio Report.

In last year's report, the mandatory GAR household exposure data did not include non-EU exposures in the eligibility calculation. To ensure comparability, and in line with Question 51 of the third Commission Communication (C/2024/6691), the bank recalculated the affected ratios and marked the restated figures (\*) in the T-1 tables. The restated 2024 household data are disclosed in the Mandatory GAR T-1 Covered Assets and T-1 KPI Stock tables in the subchapter *EU Taxonomy: Disclosures under the EU Taxonomy Regulation*.

The EU Taxonomy tables of OTP Fund Management have been restated for the year 2024 due to corrections made to previously used client data. In line with this, the corresponding rows of the EU Taxonomy tables related to the off-balance sheet exposures of OTP Bank are also be restated in the subchapter *EU Taxonomy: Disclosures under the EU Taxonomy Regulation*.

The Group has identified a reporting error during the review of comparative data in one subsidiary's electricity consumption, which resulted in an overstatement of last year's Scope 2 (market- and location-based) emissions. The data have been corrected, and the previously published figures have been restated accordingly. Recalculated information is presented in [E1-6] subchapter.

To enhance transparency and comparability of sustainability disclosures, the Group has continued to report on the below listed metrics of the Global Reporting Initiative (GRI) Standards and entity-specific disclosures. The table below summarizes selected GRI and entity-specific indicators that are included for this reporting year corresponding to material topics.

GRI metrics	Name of the disclosure	Related topical ESRS
GRI 418-1	Complaints concerning breaches of customer privacy and losses of customer data	ESRS S4
GRI 2-27	Compliance with laws and regulations	ESRS G1
Entity-specific metrics		Related topical ESRS
Green portfolio of OTP Group (as defined in 2.1.13 Reporting policy)		ESRS E1
Employee engagement survey results		ESRS S1
Total financial losses from loan fraud		ESRS G1
Number of employees completing AML trainings		ESRS G1

The list of references in relation to disclosure requirements and specific datapoints, is presented in the table of ESRS content index, in the 6. ESRS Index subchapter.

In 2025, the European Commission has adopted targeted „quick fix” amendments<sup>15</sup> to the first set of ESRS by extending phase-in period for first wave reporting companies, thus OTP Group may continue to omit certain disclosures for financial year 2025. The applied phase-in disclosures in relation to material topics are presented in the ESRS content index, while brief description is included in the relevant topical chapters.

<sup>15</sup> Source: Commission Delegated Regulation (EU) of 11.7.2025 amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings: [csrd-delegated-act-2025-4812\\_en.pdf](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32025R04812)

## 1.2 Governance

### 1.2.1 [GOV-1] The role of the administrative, management and supervisory bodies

#### Composition and Diversity

The administrative, executive, and supervisory bodies of OTP Group are the Board of Directors, the Supervisory Board, and the Audit Committee of OTP Bank Plc. Additionally, standing and special committees (16 committees) are established by the Board of Directors of OTP Bank, further details on various committees' operation could be found in Corporate Governance Report. From sustainability perspective ESG Committee is the core organizational body with the responsibility to oversee impacts, risks and opportunities, while the Board of Directors and the Supervisory Board has controlling role, as it is presented in detail in the following chapters (*Roles and responsibilities in relation to sustainability governance*).

Composition and diversity of the members of the administrative, executive, and supervisory bodies	OTP Bank			
	Board of Directors	Supervisory Board	Audit Committee	Additional Committee
Number of executive members (person) <sup>16</sup>	11	0	0	33
Number of non-executive members (person)	0	6	4	13
<b>Total number of members (persons)</b>	<b>11</b>	<b>6</b>	<b>4</b>	<b>46</b>
Number of employee representative members (persons) <sup>17</sup>	0	2	0	0
Number of men	10	4	3	44
Proportion of men	91%	67%	75%	96%
Number of women	1	2	1	2
Proportion of women	9%	33%	25%	4%
Number of independent members in the Supervisory Board	-	4	-	-
Proportion of independent members in the Supervisory Board	-	67%	-	-

Professional experience of the governing bodies (members of the Supervisory Board and the Board of Directors) is presented in detail in [@Appendix](#) Members in governing bodies, must be collectively capable (collective knowledge) of making informed decisions on matters within the committee's decision-making authority. It is not required that all members possess high-level knowledge in all matters within the governing body's authority, as far as the composition of the governing bodies ensures appropriate professional capability, experience and background knowledge. There is a yearly revision on appropriate skills of the Bank's governing members. Primary considerations in forming standing committees are to elect members who have in-depth knowledge and professional experience in relation to the committee's decision-making authority.

These principles are also applicable in sustainability governance to assess skills and capability of board members in sustainability related questions. The Nomination Committee reports annually to the Board of Directors and to the Supervisory Board on the individual and collective capability assessment, including the evaluation of sustainability-related skills.

#### Roles and responsibilities in relation to sustainability governance

ESG Committee is the core organizational body of OTP Group, that is responsible to oversee and manage sustainability related matters, impacts, risks and opportunities. The ESG Committee is a standing committee, established by the Board of Directors in 2021. Since then, the Committee actively contributes to supporting sustainability-related initiatives and reporting assignments. The ESG Committee's and ESG Sub-Committee's roles and responsibilities are defined and incorporated into the corporate Organizational and Operational Regulation.

The management and supervisory bodies, supported by the top management, oversee the core procedures and hold the decision-making authority regarding material impacts, risks and opportunities, the ESG strategy (including the validation and approval of settled sustainability goals and targets) and ESG initiatives integrated into the Group's Risk strategy.

OTP Group has defined key roles and responsibilities of the administrative, management and supervisory bodies related to the management and monitoring of material impacts, risks and opportunities across multiple organizational levels:

<sup>16</sup> For the Board of Directors performs the executive function in corporate law, so both internal and external members perform executive functions.

<sup>17</sup> The Work Council delegates members based on the Civil Code, and the members of the Works Council are elected by the employees of OTP Bank Plc. from among themselves.

*Supervisory Board:*

- Main governing and supervisory body, which is regularly informed through written reports about strategically significant transactions and decisions, as well as all material matters submitted to the General Meeting.

*Board of Directors:*

- Main decision-making and monitoring body, that receives a comprehensive quarterly report on the topics discussed at the quarterly ESG Committee meetings.
- Oversee the progress of ESG strategy and implementation of the MNB Green Recommendation.
- Has final validation role of ESG strategy, Risk strategy and receive advance information on the annual sustainability report.

*ESG Committee:*

- Design ESG strategy, plans, and policies of OTP Group,
- Review and validation of the Group's DMA procedure and its results (involving the monitoring of impacts, risks, and opportunities),
- Assessing and monitoring climate-related, environmental, social and governance risks,
- Setting and evaluating sustainability related goals and targets,
- Monitoring of sustainability reporting procedure,
- Review all ESG-related proposals before they are submitted to the governing body,
- Supporting management and governing bodies by informing and advising on ESG related matters,
- The Chairman of the ESG Committee is appointed by the Chairman from the members of the Board of Directors, and its members are the CEO, Deputy CEOs and elected directors of OTP Bank.
- Members of the ESG Committee are nominated based on their knowledge on sustainability impacts, risks and opportunities, while also external experts could be involved to support the Committee's work.

*ESG Sub-Committee:*

- Serves as a permanent working body that supports the ESG Committee through coordination, consultation, and implementation activities. It plays a key role in providing technical expertise and operational support in sustainability related matters.
- The Sub-Committee is led by the Managing Director of the Green Program Directorate, who also heads ESG business transformation within the Group.

*Green Program Directorate:*

- Contributes to defining OTP Group's sustainability, environmental and social ambitions in line with the ESG strategy, setting the related departmental objectives, supporting their implementation, and monitoring their progress,
- Communicates with stakeholders, facilitates cross-divisional work,
- Ensures regular reporting, focusing on budget, scope, schedule and dependencies,
- Manages agenda for Operating & Steering Committees,
- Supports delivery of projects with project management expertise,
- Provides environmental expert competencies.

*ESG representatives of operational departments and subsidiaries:*

- Act as consultant/expert contributor in various projects, supports delivery of projects with special domain expertise,
- Active involvement in the double materiality assessment and reporting procedure,
- Supporting the identification and evaluation of material impacts, risks, and opportunities,
- Participating in the identification and management of ESG risks, the development and implementation of sustainability strategy and related policies,
- Supporting sustainability reporting procedure by providing information and monitoring the most relevant sustainability matters.

*Risk Division:*

- Embedding ESG regulatory requirement into the risk-taking processes and mitigation techniques.
- Defining ESG methodologies, risk metrics, risk appetite and performance indicators, and ensuring necessary data collection for effective implementation.
- Integrating ESG risks across multiple risk categories.
- Preparing regular ESG Risk status reports for the Risk Management Committee and ESG Committee.
- Operating ESG Risk Forum to strengthen ESG alignment across risk domains.
- Cooperating with Green Program Directorate to ensure cross-functional consistency.

To continuously develop sustainability expertise of members in management and governing bodies, regular ESG training is organized. The Board Effectiveness e-learning material for executive bodies includes annual ESG training session starting in 2026, the development of this session is currently in progress. Besides, ESG Magazine 2025, a training resource is accessible for all employees.

In the previous years, multiple level ESG trainings were organized to the executive and strategic-level leaders of the Group, by involving external sustainability experts. Sustainability-related materials of the trainings are continuously accessible to the members of the governing bodies through the e-learning system.

Besides, an educational platform was established by the Risk department, which also encompasses ESG-related topics. The training material is designed to enhance understanding of ESG risks, the regulatory environment, and illustrate how various risk types have embedded ESG consideration the operation.

### **1.2.2 [GOV-2] Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies**

The Board of Directors' objectives and activities emphasize increasing shareholder value, efficiency and effectiveness, managing risks, and ensuring full compliance with external regulations. Therefore, the governing body's main objective is to effectively implement business, ethical standards and internal control procedures. OTP Group's Board of Directors is responsible to ensure the effectiveness of internal lines of defence and provide a sustainable business model that considers all risks, including ESG risks.

The Supervisory Board is responsible to ensure legal and business compliance within the Group operation and monitoring the operational effectiveness of internal defence lines.

OTP Group's material impacts, risks, and opportunities (IROs) were assessed and identified through the double materiality assessment (DMA) process. To ensure comprehensiveness, the DMA process involved group-level sustainability and subject-matter experts from the headquarters and from major foreign subsidiary banks and agricultural companies, ensuring continuous awareness of material impacts, risks, and opportunities. Accordingly, the strategic insights, decisions, and operational risks identified by core management stakeholders were incorporated into the DMA process. From a validation perspective, these stakeholders were regularly kept informed about the progress and outcomes of the procedure. ESG Committee has a general overview on material IROs and the sustainability reporting process, thus material impacts, risks and opportunities were reviewed and validated by the ESG Committee and subsequently evaluated and approved by the Board of Directors, as part of business reporting of sustainability related matters. The identified impacts, risks and opportunities were presented and approved by governing bodies during the reporting period. Details of the DMA process is presented in subchapter [IRO-1]. The material topics and IROs are presented in subchapter [SBM-3]. The DMA process is subject to regular review to ensure that the Group's management and governing bodies consistently evaluate and consider the most relevant impacts, risks, and opportunities in its strategic overview and decision-making.

The identified material sustainability topics are managed by different departments within the Group. The following table presents the responsible departments and organizational units for the material topics as well as the related reporting practices to the governing bodies:

Material impacts, risks and opportunities addressed in the reporting period	Department or organizational unit responsible for the sustainability topics	Reporting practices to the governing bodies
<ul style="list-style-type: none"> <li>Climate-related identified physical risks</li> <li>GHG emissions in the portfolio</li> <li>GHG emissions in own operations</li> <li>Financing climate change mitigation activities</li> <li>Climate-related transition risks</li> <li>Climate-related physical risks</li> <li>Financing energy-intensive sectors</li> <li>Financing renewable energy or energy-efficient solutions</li> <li>Environmental impact of climate change</li> <li>Environmental impact of land-use change</li> </ul>	ESG Committee (detailed tasks in <i>Roles and responsibilities in relation to sustainability governance</i> )	The Committee meets quarterly. The Board of Directors receives a comprehensive report on the topics discussed at the ESG Committee's quarterly meetings. The Supervisory Board receives a written report on the annual report of the Board of Directors. Additionally, the Board of Directors receives a written report on the annual progress of the ESG strategy.
<ul style="list-style-type: none"> <li>Secure employment</li> <li>Employee benefits</li> <li>Adequate wages</li> <li>Inadequate employee involvement</li> <li>Gender equality and equal pay for work of equal value</li> <li>Training and skills development</li> <li>Insufficient training and skills development</li> <li>Non-adequate wages</li> <li>Measures against violence and harassment in the workplace</li> <li>Diversity</li> </ul>	Human and Organizational Development Directorate	Human resource issues are quarterly reported to the ESC (Executive Steering Committee), and a report on the results of group-level engagement survey is prepared annually for the Supervisory Board.
<ul style="list-style-type: none"> <li>Data privacy and cybersecurity breaches</li> <li>Awareness raising in financial education and marketing</li> <li>Inadequate information provision to customers</li> </ul>	Security Directorate, Retail Customer Tribe	<p>The Security Directorate prepares an annual security risk and performance report, which is submitted to both the Board of Directors and the Supervisory Board. This reporting process ensures that senior governance bodies maintain oversight of security-related risks and controls.</p> <p>The Retail Customer Tribe submitted proposals to the Board of Directors concerning the new product policy, ensuring compliance with consumer protection recommendations, as well as the complaint handling policy. The Retail Customer Tribe provides an annual report to the Board of Directors.</p>
<ul style="list-style-type: none"> <li>Weak ethical culture or business misconduct</li> <li>Money laundering and counterterrorism</li> </ul>	Compliance Directorate	The compliance officer reports on compliance to the Bank's Board of Directors quarterly and to the Supervisory Board annually. The reporting practice includes information on business conduct and anti-money laundering, among other compliance related matters.

The ESG strategy of OTP Group was approved by the Management Committee for the 2021-2025 period. The strategy is reviewed annually to align with changes in the market and regulatory environment. The ESG strategy includes elements from material topics of OTP Group, however it was prepared before the first ESRS compliant double materiality assessment of the Group. By developing OTP Group's ESG strategy for the 2025-2028 period, the identified material impacts, risks and opportunities in the DMA process are considered and integrated in alignment with their strategic relevance and operational applicability. The annual progress of the ESG strategy is presented in a written report to the Board of Directors. Details about the ESG strategy is presented in subchapter [SBM-1].

OTP Group's Risk strategy also incorporates ESG initiatives, by covering the period of 2026-2028. The Risk strategy provides a group-wide framework, by incorporating regulatory requirement, by defining strategic direction across entities and ensuring alignment with the group's long-term objective (further details are presented in subchapter [E1-3])

### 1.2.3 [GOV-3] Integration of sustainability-related performance in incentive schemes

Members of the Supervisory Board and the Board of Directors of OTP Bank receive only fixed remuneration. Executive Board members and employee delegates of the Supervisory Board fall under the scope of the Group's Remuneration Policy. Most of other committee members also fall under this Policy. Employees are not covered by the Policy typically receive incentive bonuses. Incentive scheme of the Banking group's Remuneration Policy is approved by the Supervisory Board. Sustainability-related incentives are introduced in the Remuneration Policy.

#### *Performance measurement and evaluation*

Performance measurement and evaluation system is linked to the level of achievement of group/bank/subsidiary institutional and individual objectives within a two-tier performance measurement system. The set of institutional indicators is standardized at the institutional level, with exceptions applying to executives responsible for internal control functions<sup>18</sup>. For executives in internal control functions, only the RORAC+ indicator<sup>19</sup> is included among the institutional indicators.

For individual indicators, the weight of one indicator among the objectives – except for the network – is generally a minimum of 5% and a maximum of 30%. The evaluation of institutional and individual objectives is done separately on a scale of 0-100% (based on the level and weight of performance indicators and target objectives). Performance evaluation is based on individual agreements and individual performance evaluations within the affected group.

#### *Sustainability-related factors in performance evaluation*

In performance evaluation, the measurement of specific sustainability-related objectives is done through the ESG and CSR indicator – as an individual indicator – which is considered a reference value. The ESG and CSR indicator, under the designation “Environmental and Social Responsibility (ESG-CSR)” carries a uniform weight of 5% in the performance evaluation of the Bank's first- and second-level executives, Regional Directors, executives of foreign subsidiaries, and first-level executives of domestic subsidiaries directly supervised by OTP Bank that do not fall under the scope of the remuneration policy. The following aspects are evaluated within the indicator: achieving the goals set out in the ESG strategy, applying significant ESG aspects during operations, implementing them into own business processes and internal regulatory documents, strengthening ESG awareness within the organization, providing quality data for the sustainability/integrated report by the set deadline, and properly operating CSR-related processes (especially: adequately supporting CSR initiatives related to the professional's field).

Climate-related considerations are considered as part of the ESG-CSR indicator for those covered by the Remuneration Policy. GHG emission reduction targets are not included in the performance evaluation.

Additional sustainability-related individual indicators are the following: The Banking Group measures compliance with the limits set in the Bank's risk appetite statement (RAS) within the individual indicators for the Deputy CEOs responsible for business and risk management and the CEOs of the subsidiary banks. The weight of the individual indicator is at least 5% and at most 10%. (Based on Recommendation No. 11/2022 (VIII.2.) of the Hungarian National Bank (MNB), for the year 2025, the indicator “Compliance with RAS limits” must be mandatorily applied with a minimum weight of 5% as an individual-level indicator for first-level executives of the Commercial Banking, Retail, and Risk Management Divisions. In the case of the first-level executive of Ipoteka Bank, where the application of the RAS limits indicator is currently not feasible due to data issues, the indicator has been formulated to strengthen the risk culture. For first-level executives of foreign subsidiaries, the indicator “Adherence to risk appetite statements and limits” must be mandatorily included in individual objectives, with a minimum weight of 10%.)

Based on Section 22 (2) of Act LXVII of 2019, the Bank does not prepare a remuneration report.

<sup>18</sup>At OTP Bank SA in Moldova (OBM) the executives responsible for internal control functions and the executives fulfilling control functions (Heads of Risk Management, Compliance, Internal Audit, and Bank Security) are included. In the case of executives performing internal control functions at OBM, institutional indicators must be disregarded in performance evaluations – taking into account the findings of the local National Bank. Accordingly, the performance evaluation results for these executives will depend exclusively on the assessment of individual performance.

<sup>19</sup>Return on Risk-Adjusted Capital Plus (RORAC+) compares the return on equity (ROE) to the expected return (ER), using the formula:  $RORAC+ = ROE / ER$ . This is a financial performance indicator primarily used by financial institutions within risk management frameworks and remuneration systems.

### 1.2.4 [GOV-4] Statement on due diligence

OTP Group's due diligence processes are implemented as part of general business conduct, mainly driving by compliance requirements. Sustainability related considerations were evaluated during the double materiality assessment (DMA) process. ESG representative of operational departments have reviewed core activities along the value chain and have evaluated the core impacts, risks and opportunities identified in their own operation and in relation to the value chain. Besides, risk assessment and mitigation processes are connected to general operational procedures, that were integrated in the IRO assessment.

Standing committees established by the Board of Directors of OTP Bank are the highest-level bodies in the group governance system, serving as decision-making, advisory and monitoring bodies. Dedicated Committees are responsible of risk management (Credit and Limits Committee, Group Operational Risk Management Committee, Committee on the Prevention of Money Laundering, Risk Assumption and Risk Management Committee).

The individual elements of the due diligence process applied by OTP Group are presented in the Sustainability Statement as follows. In identifying the elements, the relationship between the due diligence elements presented in Chapter 4 of ESRS 1 and the ESRS disclosure requirements:

Core elements of due diligence	Paragraphs in the sustainability statement
Embedding due diligence in governance, strategy and business model	@GOV-2, @GOV-3, @ESRS SBM-3
Engaging with affected stakeholders in all key steps of the due diligence	@GOV-2, @SBM-2, @IRO-1, @S1-2, @G1-1 policies
Identifying and assessing adverse impacts	It was implemented separately in connection with the preparation of this report, and is not integrated into the operation of the organization
Taking actions to address those adverse impacts	Actions related to material topics (@E1-3, @S1-4, @S4-4)
Tracking the effectiveness of these efforts and communicating	Metrics and targets related to material topics (@E1-4, @S1-5, @S4-5, @G1-1).

### 1.2.5 [GOV-5] Risk management and internal controls over sustainability reporting

The sustainability reporting process is coordinated by the Green Program Directorate of OTP Bank, which establishes and operates internal controls. The core element of effective risk management and internal control processes in relation to sustainability reporting is close collaboration between various departments within the Group. The Green Program Directorate organizes regular meetings and consultative workshops to actively involve relevant operational departments (from the DMA process, over the reporting). This collaborative approach helps guarantee that essential data and insights are collected and shared in accordance with the disclosure requirements set by the ESRS, as well as providing a platform for departments to raise their concerns regarding the reporting process. Review and validation on information reported in relation to material topics of OTP Group is assigned to departments with the most in-depth expertise on the subject matter. Applying these practices the Group aim is to accurately communicate and integrate sustainability related information into decision-making.

In line with the governance framework of OTP Group, OTP Bank is acting as the parent company, plays a central role by providing strategic oversight, direction, and support to its subsidiaries. This structure promotes consistency, alignment with group-wide objectives, and efficient cooperation across all subsidiaries within the Group.

To support the effective identification and evaluation of risks associated with the Group's sustainability reporting practice, the Green Program Directorate conducts a thorough review following the completion of the sustainability reporting and the annual reporting cycle. This review focuses on assessing potential risks linked to anticipated changes in the upcoming period. This evaluation also covers the technical, administrative, and content conditions of report preparation. Throughout this assessment, challenges and risk factors are identified and prioritized based on their severity and likelihood of occurrence. Appropriate development actions are then outlined to address these risks and improve future reporting processes.

Changes in regulatory expectations, timely availability and accuracy of data were identified as the main risk factors arising in the course of the reporting process. The risks associated with the timely availability of data are increased by changing regulatory expectations, which necessitate modifications to the data collection methodology and the Sustainability Data Collection Platform used by the Group to gather both quantitative and qualitative, sustainability-related information. This increases the likelihood of data providers encountering difficulties during the data collection process.

## Risk Mitigation and Control Measures:

Reporting at entity level

- To ensure compliance with CSRD reporting obligations, a Project Audit Committee has been established, which continuously monitors the reporting and audit process.
- In 2025, a comprehensive Reporting Policy was developed, which sets out the reporting processes in detail. This policy defines the responsibilities of each party involved in the reporting process and includes the necessary definitions to ensure consistent and reliable data collection. The policy serves as a reference for all departments, clarifying roles, timelines, and the standards to be applied, thereby supporting the integrity and transparency of the sustainability reporting process.
- For quantitative information in sustainability reporting, the Group builds on data and definitions already used by OTP Group for other purposes, to mitigate the potential for errors due to definitional differences, as well as for those data risk management and control processes already implemented.
- Various tools such as explanations on the data collection platform and instructional videos assist the departments in the reporting and data collection process.
- The Green Program Directorate provides active support throughout the data collection process for any arising questions.
- During the preparation of the 2025 Sustainability Statement, interim data collection for certain data points was also conducted in addition to the annual one, to check the data in a timely manner and reduce the risks arising from ESRS expectations.
- Monthly meetings are organized to communicate and report the challenges and findings related to the reporting process for the Project Audit Committee during the preparation of the Sustainability Statement.
- The Sustainability Statement is submitted to the Board of Directors and the Supervisory Board as part of the Integrated Annual Report before being published on the website.
- To comply with sustainability regulations, the reporting procedure is continuously monitored by an independent auditor, ensuring that the Sustainability Statement undergoes limited assurance.
- Periodic reporting on findings of risk assessment and internal controls efficiency over sustainability reporting processes (including independent auditor insights) are performed by Green Program Directorate on ESG Committee meetings.

Reporting on data-level:

- Information collection through the Sustainability Data Platform makes data provision and reporting transparent and traceable.
- The four-eyes principle is applied to the collected information, with an approval function in addition to data entry in the data collection process.
- The data collection platform performs automatic checks based on multiple criteria, in addition to which the department coordinating the reporting also conducts checks. The discussions and error corrections related to the checks are traceable within the platform.
- We perform cross-checks between the data collection platform and data collected in other systems.
- After the reporting cycle, data providers receive feedback on the typical errors of the information provided through the data collection platform.
- We conduct consultations with the departments providing information regarding the correct interpretation and completion of narrative information.
- The templates used to collect narrative information were reviewed and updated to ensure that the required content complies with ESRS standards.
- In case of narrative content, we aim to incorporate information from approved and documented sources.
- Approval is also required for narrative information.
- The information in the report is approved by the relevant departments.

## 1.3 Strategy

### 1.3.1 [SBM-1] Strategy, business model and value chain

#### 1.3.1.1 Business Model, Products and Services

As a universal banking group, OTP Group's business model aims to meet the financial needs of retail, private banking, micro- and small enterprises, medium and large enterprises, and municipal clients at a high level through branch networks, continuously developing digital and innovative remote service channels, as well as through agents and other contracted partners. OTP Bank and its banking subsidiaries served the financial needs of more than 17.5 million clients at the end of 2025.

OTP Group is actively present in the following markets and sectors<sup>20</sup> through its subsidiaries, which provide products and services in the countries listed below:

	Financial and insurance activities	Real estate activities	Administrative and support service activities	Manufacturing	Transportation and storage	Wholesale and retail trade	Professional, scientific and technical activities	Other service activities	Information and communication	Accommodation and food service activities	Agriculture	Construction
Hungary												
Bulgaria												
Slovenia												
Croatia												
Serbia												
Uzbekistan												
Ukraine												
Montenegro												
Albania												
Moldova												
Russia												

##### 1.3.1.1.1 Financial activities

OTP Group operates in 10 Central and Eastern European countries and one Central Asia country. The parent bank of OTP Group is OTP Bank, which is one of Hungary's leading credit institutions. At the end of 2025, the Hungarian operation accounted for 35% of the Group's assets. In addition to its operations in Hungary, the Bank has foreign subsidiaries in a total of 10 countries as a strategic investor through capital investments, typically holding 100% or nearly 100% ownership. Among the group members, OTP's Montenegrin subsidiary is also a market leader based on total assets, while the Bulgarian, Slovenian, and Serbian operations are the second largest in their respective local markets. The Croatian, Albanian and Moldovan subsidiaries rank fourth in their local banking markets in terms of net loans. Among the larger foreign subsidiaries, the Bulgarian accounted for 18.7%, the Slovenian 13.1%, the Croatian 8.5% (thus the Eurozone and ERM 2 countries accounted for 40.3% in total), and the Serbian 7.6% of the Group's assets.

The key banks and other financial companies within the Group offer a wide range of modern banking and financial services to both retail and corporate clients in Hungary and abroad: they collect demand and term deposits from their clients and offer a wide range of other savings forms, including – varying by country – pension services, government securities, investment funds, stocks, corporate bonds, and other securities and structured investments.

The three main revenue generating activities of OTP Group's financial segment – as defined in the value chain assessment – are:

- revenue from interest income (banks with lending-related activities, such as home loans, open-end mortgages, agricultural loans, factoring, project financing, or leasing)
- revenue from account management fees and insurance services (banking, fund management and insurance companies with management of retail and corporate account packages with offered, additional services, as well as insurance packages, such as personal, travel, home, health and repayment insurance, for which the customers are required to pay fees and charges)
- revenue from investments (funds and similar financial entities with securities account, stock exchange transaction orders, investment fund shares, etc.)

<sup>20</sup> Sector classification is based on the NACE codes of subsidiaries' main activities

In line with the strategy, the Group aims to ensure the conditions for stable operation and growth across economic cycles by maintaining a stable liquidity position. Some group members have an active presence in capital markets: OTP Bank has issued bonds in multiple currencies and maturities in recent years, partly to comply with MREL requirements, targeting investors across a wide geographical range. Additionally, OTP Mortgage Bank, the Slovenian subsidiary, the Albanian subsidiary, and the Uzbek Ipoteka Bank have outstanding issued mortgage bonds and bonds.

On the asset side, group members provide retail mortgage loans and consumer loans (including personal loans, credit card loans, commercial credit, car loans, overdrafts, baby-expecting loans), corporate investment and working capital loans, municipal loans, and leasing services. Within the Group's net loans, mortgage loans accounted for 28.6%, consumer loans 26.7%, corporate loans 34.1%, micro and small enterprise loans 3.9%, and leasing 6.8% at the end of 2025. Depending on the balance sheet structure of the entity, Group members invest their liquidity reserves in money and capital markets (including interbank loans and corporate bonds) or receive intergroup financing. Additionally, a wide range of modern financial services offered by Hungarian and foreign subsidiaries, among others asset and fund management, investment and treasury services, payment services, pension services, and other financial services (e.g., guarantees, factoring, letters of credit, bill discounting, private equity fund management).

Differences can be observed between countries in terms of business focus, the range of services and products offered, and sales channels. Regarding business focus, while the proportion of retail and corporate loans and leasing portfolios is relatively balanced in most countries of the Group compared to the overall Group ratios, in Ukraine, the corporate and leasing portfolios account for 85.8% of the outstanding loans, while in Russia the proportion of retail consumer loans reaches 99.5%, while the mortgage loan portfolio is negligible in both countries.

There were no major changes in the range of products and services offered by OTP Group in 2025.

## ESG Strategy

The Group defines its long-term sustainability, transparency, and ethical operation through stable management, responsible and transparent governance, being a responsible employer in the labour market, and an active participant in society. The Group aims to provide responsible and fair financial services tailored to customer needs, fostering open cooperation with stakeholders based on trust, while also aims to reduce negative environmental impacts of its operation. In order to foster these corporate ambitions, the Group has defined its ESG strategy in 2021 for a five-year period (2021-25). This ESG strategy was revised and restructured for the following three years (Sustainability Strategy 2026-28). Core objectives and actions in relation to the current and next ESG strategies are presented separately below.

### *OTP Group's 2021-2025 ESG Strategy*

Stability and sustainability are two of the cornerstones of OTP Group's corporate strategy. The Management Committee unanimously approved the Group's ESG strategy for 2021-2025 in 2021. It is reviewed annually to align with changes in the market and regulatory environment. The strategy, along with the related vision and mission did not change in 2025.

The strategy has three pillars: responsible service provider, responsible employer, and responsible social actor.

### **Vision**

Responsible financial decisions and socially and environmentally adequate, ethical financial solutions are available for all economic participants and citizens in all of the countries covered by OTP Group's operations.

### **Mission**

For us, sustainability means taking responsibility for our economic, social, and environmental impacts. We firmly believe that with our leading role in the Central and Eastern European region and our presence in Central Asia, our pioneering developments, conscious and ethical business operations, and exemplary partnerships, we create value and contribute to a sustainable future.

An important pillar of OTP Group’s ESG Strategy is green lending. In this report, green lending, green loans or green exposure refer to financial exposures classified under the Banking Group’s internal green definition. This definition includes on-balance sheet loans, advances, leases, and bond exposures that have undergone an internal green assessment process and meet the technical screening criteria established in the Banking Group’s sustainability frameworks. The only exception applies to the EU Taxonomy disclosure, where green loans and the Green Asset Ratio (GAR) KPI refer exclusively to financial exposures that comply with EU Taxonomy requirements. The detailed green lending definition is presented in subchapter Reporting policy regarding chapter E. To ensure full alignment with the OTP Bank CEO Directive on Greenwashing (9/2025) and EU good practices, OTP Group provides an overview of all green concepts applied in this report in the [E1-2] Policies related to climate change mitigation and adaptation chapter.

Strategic goals	KPIs	2025 year-end results
<b>Responsible service provider</b> <ul style="list-style-type: none"> <li>Products and services promoting the green transition of the economy</li> <li>Products and investment services aimed at promoting investments in a sustainable economy</li> <li>Active ESG risk management</li> </ul>	Group-wide, a total of HUF 1,500 billion in green loans by 2025 (detailed in subchapter 2.1.8.1 Green lending targets)	With 1,697 billion HUF in green loans, we have achieved/exceeded the target set for 2025 (detailed in subchapter 2.1.9.1. Voluntary green portfolio report)
<b>Responsible employer</b> <ul style="list-style-type: none"> <li>Enhancing employee well-being and development, diversity and employee engagement</li> </ul>	Maintain or improve employee engagement levels to exceed the financial industry benchmark and reach the Global 75th benchmark <sup>21</sup> across the Group. In 2025, the financial sector benchmark was 74%, while the Global 75 was set at 78% <sup>22</sup> .	The engagement level of OTP Group increased by 1 percentage point year-on-year, rising from 77% to 78%. We reached the Global 75th percentile benchmark for engagement, and our results are above the financial services benchmark for almost all engagement drivers.
<b>Responsible social actor</b> <ul style="list-style-type: none"> <li>Significant reduction of emissions from own operations</li> <li>Contribution to social goals and the UN Sustainable Goals (SDGs) through responsible products and services, as well as donations</li> </ul>	Carbon neutrality partially offset by carbon credits by the end of 2022 (achieved), and the goal of net zero emissions for OTP Bank by 2030. <sup>23</sup> (detailed in subchapter 2.1.10.1 Climate target setting)	We have been achieving the set goal for carbon neutrality by offsetting since 2022. (detailed in subchapter 2.1.12 GHG removals and GHG mitigation projects financed through carbon credits)
	The goal is for OTP Bank to become a member of the S&P Dow Jones Sustainability Index by 2025	OTP Bank participates in the S&P Global Corporate Sustainability Assessment and achieved a score of 46 points in 2025, unchanged year on year. The CSA score is a prerequisite, but not sufficient on its own, for inclusion in the S&P Dow Jones Sustainability Index. <sup>24</sup>

OTP Group’s foreign subsidiary banks have developed their individual ESG strategies in 2022, and in 2024 by integrating country specific attributes to define own sustainability goals, while contributing to the group level ESG objectives. The subsidiaries’ ESG strategies address ESG risk management, development of green lending processes and organizational frameworks, emphasize the support of social issues, and the mitigation of adverse environmental impacts of own operation. Sustainability targets and related KPIs were also identified to monitor the effectiveness of the settled ESG goals. The Board of Directors of OTP Bank is informed about the achievement of ESG goals and performs annual review on subsidiaries’ sustainability plans.

OTP Group integrates green/climate-conscious lending into its business activities and aims to ensure that over time, any client in any sector may access credit under green conditions, provided the client has a substantiated and verifiable green or sustainable objective that the loan is intended to support. The maturity of this process varies by country, industry, and customer segment, and is subject to ongoing development. The conditions and procedures for green/sustainable lending are defined in the OTP Group Green Financing Framework, which is reviewed periodically and is subject to continuous expansion.

<sup>21</sup> Based on the benchmark of more than 750 companies.

<sup>22</sup> The engagement score is an output value, which means it cannot be directly improved. For a more detailed methodological description, see: ESRs S1-5.

<sup>23</sup> In the case of carbon neutrality partially offset by carbon credits, the carbon credit comes from a verified source, without restrictions on the type. Net zero emissions involve reducing greenhouse gas emissions as much as possible and neutralizing unavoidable emissions through carbon removal. The goal covers Scope 1-2 emissions.

<sup>24</sup> The latest available result as of 31 December 2025

The key sectors for green financial products in the Group's portfolio are the following:

- Energy: renewable energy production, distribution, storage, and related loan purposes
- Real estate: construction, purchase of green properties, as well as financing renovation of buildings that result in significant energy improvements
- Transportation: electro-mobility

Detailed information about OTP Group's green financial products, financing results and related challenges are presented in the environmental information, [E1-3] subchapter.

#### *OTP Group's 2026-2028 Sustainability Strategy*

OTP Group has adopted its Sustainability Strategy for the 2026-2028 period. The new strategy builds on previous objectives and introduces enhanced commitments in decarbonization, social responsibility, and governance practices. The strategy incorporates stakeholder interests by involving counterparties in decision-making (relevant departments and committees). Broader stakeholder perspectives were incorporated through the participation of internal employees, who possess knowledge of the opinions and interests of these stakeholders, ensuring representation of all material stakeholders.

The Strategy is organized around six key priorities:

#### 1. Green Lending

- Establishing green lending targets, presented in [E1-4] subchapter
- Defining green lending criteria
- Assessing green funding needs
- Strengthening ESG competencies within the organization

#### 2. Reporting Requirements

- Improving reporting processes
- Enhancing data collection and related control mechanisms

#### 3. Transition Planning

- OTP Group has initiated its transition planning, as detailed in [E1-1] subchapter

#### 4. Decarbonization of Own Operations

- OTP Bank developed a plan to decarbonize its own operations and set targets by 2030, which is addressed in subchapters [E1-2], [E1-3], and [E1-4]. The plan will be gradually extended on Group level.

#### 5. Managing External ESG Perception and Ratings

- Ensuring transparent communication and engagement with rating agencies

#### 6. Social and Governance Initiatives

- Covering workforce-related programs, client engagement, and governance enhancements

Progress toward the Sustainability Strategy's objectives is monitored through an annual reporting process, whereby the responsible departments submit updates to the Green Program Directorate. This governance structure ensures accountability and systematic tracking of implementation.

The Management Committee approved the Banking group-level Sustainability Strategy for the following period at the end of 2025.

##### 1.3.1.1.2 Non-financial activities

Non-financial companies within the Group, which collectively represent a smaller 2.21% proportion based on profit, cover activities such as real estate development and operation and agriculture.

OTP Group's agricultural subsidiaries are present in Hungary and have operations in crop production, livestock keeping and breeding, as well as in the manufacturing of meat and dairy production, however the latter constitutes only a minor part of the agricultural activities. Most of the Group's agricultural activities do not directly affect end-users or customers, as most products sold by the Group undergo further processing.

The activities, products, and services of other non-financial subsidiaries within OTP Group are highly diverse and varied. However, since they represent only a very small portion of the Group's overall operations, it is not covered in detail in this report. The range of products and services offered did not change significantly in 2025. In 2025 OTP Group has acquired four companies in Hungary operating in the agricultural sector.

OTP Group's acquisition strategy is based on creating shareholder value by achieving optimal operating size and leveraging OTP's expertise in regional markets. As a result of 24 bank acquisitions and one portfolio

takeover carried out since the early 2000s, significant experience has been accumulated within the Group in both the acquisition process and the integration and business-operational transformation projects within the Group.

The Group headcount of employees by geographic areas is presented in the social information, [S1-6] Own workforce subchapter.

1.3.1.2 Value chain

OTP Group has operations in several economic sectors through its financial and non-financial subsidiaries. Among these sectors, financial services and agricultural activities are the most relevant based on financial and impact materiality. As part of the double materiality assessment (DMA) process, the Group has performed a value chain assessment. The following tables present the most relevant value chain activities, business actors and other stakeholders from the Group’s operational perspective.

1.3.1.2.1 Financial services

OTP Group's three main revenue generating activities (in relation to financial and insurance activities) are presented in the detailed value chain map: (1) revenue from interest income (banks with lending-related activities, such as home loans, open-end mortgages, agricultural loans, factoring, project financing, or leasing); (2) revenue from account management fees and insurance services (banking, fund management and insurance companies with management of retail and corporate account packages with offered, additional services, as well as insurance packages, such as personal, travel, home, health and repayment insurance, for which the customers are required to pay fees and charges); (3) revenue from investments (trusts, funds and similar financial entities with securities account, stock exchange transaction orders, investment fund shares, etc.).

	Business activity		Estimated location	Affected stakeholders
Upstream	Procurement (products/ services)	Marketing, IT, telecommunications, and other product procurement (e.g. laptops)	Hungary, Bulgaria, Slovenia, Croatia, Serbia, Uzbekistan, Ukraine, Montenegro, Albania, Moldova, Russia	Suppliers, partners
	Assessment of market demand and client acquisition	Planning, market research and attracting customers (e.g. with advertising)		Corporate and retail customers, partners (e.g. marketing agencies), own employees, (self-employed and OTP Pénzügyi Pont) agents
Own operation	Assessment of potential investments	Networking, identifying potential investment opportunities		Partners
	Product development	Product and service development, including partnerships, planning and risk assessment		Corporate and retail customers, counterparty banks, partners (e.g. Mastercard, Groupama)
	Preparation for investment	Preparing legal and economic framework for investments (due diligence, discussion on proposals, negotiation of terms and contracting)	Hungary, Bulgaria, Slovenia, Croatia, Serbia, Uzbekistan, Ukraine, Montenegro, Albania, Moldova, Russia	Legal advisor, corporate financial advisor, regulatory authority, Investment Committee
	Credit management	Providing credit lines to customers and managing accounts. In corporate lending including preparation of indicative offers, loan applications, decision-making, contracting, disbursement, monitoring and debt management.		Corporate and retail customers, investors, regulatory authority (e.g. MNB)
	Cash flow	Account management, e.g. deposits, transactions and distribution of asset management products through counterparty banks.		Corporate and retail customers, investors, regulatory authority (e.g. MNB)
	Investment activity	Investment activities, providing professional support and monitoring of targets.		Invested companies
	Asset-liability/ risk management	Supervision of the overall financial stability of the Bank.		Corporate and retail customers, investors, regulatory authority

	Business activity		Estimated location	Affected stakeholders
	<i>Administration, analysis</i>	Analysis of risk profiles and pricing models for underwriting and issuing insurance policies. Carrying out the necessary administrative activities (e.g. invoicing, queries, amendments).		Corporate and retail customers, counterparty banks, own employees, regulatory authority
	<i>Claim management</i>	Handling claims and related activities.		Corporate and retail customers, own employees, regulatory authority, counterparty banks, partner insurance companies
	<i>Collection of interest revenue/fees</i>	Collection of interest payments on outstanding credit lines. Collecting fees from customers, e.g. account management fees, transaction fees, reinsurance payments and asset management fees.		Corporate and retail customers, investors
	<i>Asset and investment management</i>	Use and investment of insured surplus and reserves to generate income and ensure solvency to cover liabilities.		Corporate and retail customers, own employees, regulatory authority, fund management
	<i>Preparation for exit</i>	Finding a buyer and negotiating contractual terms of sales.		Invested companies, institutional investors, regulatory authority (e.g. MNB), Partner Advisor
	<i>Sale of investments</i>	Sale of investments.		Invested companies, institutional investors
	<i>Revenue realisation</i>	Realisation of fees and exchange gains from investing activities.		Invested companies, institutional investors
	<i>Reports</i>	Internal and external reporting.		Regulatory authority, investors, management
	<i>Sales (including cross-selling) of products and services</i>	Sales and cross-selling of financial products and services to new and existing customers.		Own agents, credit intermediaries, own employees, corporate and retail customers
Downstream	<i>Purchase of products and services</i>	Use of products and services related to lending and account/fund management activities.	Hungary, Bulgaria, Slovenia, Croatia, Serbia, Uzbekistan, Ukraine, Montenegro, Albania, Moldova, Russia	Corporate and retail customers, counterparty banks, third-party agents

1.3.1.2.2 Agricultural activities

There are three main activities in relation to OTP Group’s agriculture and food manufacturing subsidiaries, which are presented in detail on the value chain map: (1) crop production (cultivation of winter wheat, winter barley, corn, soybeans, sunflowers among others; feed production; seed production and sales); (2) livestock breeding and keeping (livestock farming (poultry, swine/pig, cattle), processing of milk and meat products); (3) manufacture of food products (processing of dairy, meat and frozen goods).

	Core activity		Estimated location	Affected stakeholders
Upstream	<i>Procurement</i>	Procurement of plant seeds, livestock, raw materials, fertiliser and chemicals, animal feed, machinery and equipment.	Hungary (minor part from Europe)	Suppliers, partners, agents
	<i>Insurance</i>	Insurance for losses in crop production (extreme weather events), animal health issues, vehicles, distribution related destructions, financial processes and all risk property insurance.	Hungary	Insurers
Own operation	<i>Crop production, livestock breeding and keeping</i>	Crop production and land-use, livestock breeding and keeping.	Hungary	Employees, partners
	<i>Equipment maintenance</i>	Maintenance of machinery and equipment.		Suppliers, partners, contracted mechanics
	<i>Plant and animal health</i>	Plant and animal health services and inputs.		Suppliers, partners, health authorities, veterinarians, laboratories
	<i>Processing of cereals, seeds, vegetables, meat and milk</i>	Crop harvesting and processing, processing of meat and raw materials in food manufacturing.		Employees, partners, local communities
	<i>Logistics and distribution</i>	Distribution and storage of harvested crops, meat products and manufactured food products.		Partners, distributors, customers
Downstream	<i>Selling of products</i>	Sale and retail of crops, meat products and processed food products	Hungary, Romania, Serbia, Poland, Europe	Wholesalers, retailers, supermarkets, other agricultural group members

### 1.3.2 [SBM-2] Interests and views of stakeholders

OTP Group's corporate strategy aims to meet the needs and expectations of its clients, investors, and employees at the highest possible level. Subsidiary banks' ESG strategies express a strong commitment to be a responsible partner of all stakeholders, as it is defined in the Group's three strategic pillars: responsible service provider, responsible employer, and responsible social actor.

Accordingly, subsidiary banks follow their own approach to contact their core stakeholders, based on their individual operational attributes and cultural characteristics of their stakeholders' groups. The Banking Group cooperates closely with their most important stakeholders, to be informed on their opinions, collects feedback and consider development opportunities in activities, and programs. From strategic perspective, prioritized stakeholder groups are clients, investors, employees, and regulatory bodies.

Key stakeholders	Purpose of engagement and cooperation	Method of engagement and cooperation
Clients (retail, corporate)	Improving service quality, providing quality information related to services, understanding customer needs, protecting customer data	Customer satisfaction surveys, examining aspects important to customers, market research Informative and educational materials, videos Service-related information (e.g., account statements) Customer service (bank branch, telephone, video, internet) Complaint handling
Shareholders and investors	Informing about the activities and operating environment of the Group, the Group's financial results, the development of external and internal factors affecting them, expected outlooks, and ESG performance. Understanding expectations.	Annual report, stock exchange reports and presentations General meeting Personal and virtual meetings Answering investor and analyst questions
Employees	Providing responsible employer practices, enhancing employee well-being and development, diversity, and employee engagement. Providing a healthy and safe work environment with equal opportunities, fair employment practices.	Employee engagement measurement, providing feedback opportunities Performance evaluation Meetings and consultations with employee representatives (e.g. trade unions) Intranet, internal communication
Regulatory bodies, authorities	Providing overview on anti-money laundering, fair market competition, ensuring access to financial services, equal opportunities, economic intermediary, helping to achieve social goals, regulatory compliance, expanding green financial opportunities.	Reports in compliance with legal requirements Ensure availability of publicly subsidized products Cooperation to prevent crime Consultations through representative bodies (banking associations)

OTP Group aims to engage effectively with key stakeholder groups (employees, partners/suppliers, clients, shareholders and investors, government, regulatory bodies and authorities and educational institutions, local communities, NGOs) by addressing their interests and integrate stakeholders' perspectives through the double materiality assessment.

OTP Group considers the expectations and opinions of interested parties and incorporates them into its strategy and business model.

The Board of Directors, the Supervisory Board, and various committees receive regular reports on matters related to stakeholders. Members of the governing bodies can request information about the materials of any committee, as well as from any department of the Group.

The governing bodies were informed about the feedback from stakeholders – such as employees, customers, shareholders, and regulatory bodies:

- The Supervisory Board received a report on the group-level engagement survey process and its results.
- Semi-annual reports are submitted to the Board of Directors and the Supervisory Board on the experiences of handling customer complaints, the consumer protection investigations of the Hungarian National Bank (MNB, Supervisory Authority), and customer complaints received by foreign subsidiary banks.
- The governing bodies receive quarterly group-level information on the closed investigations of regulatory bodies, as well as on the MNB supervisory procedures and the status of the implementation of the recommendations made to the Bank. The investigation reports containing the results of the examinations prescribed by the MNB, to be carried out by internal audit, are reviewed and approved by the Supervisory Board or both the Supervisory Board and the Board of Directors, before being sent to the Supervisory Authority.
- The Board of Directors receives a comprehensive quarterly report on the implementation and progress of the ESG strategy.

- As part of the double materiality assessment, key stakeholder groups were identified and actively engaged through structured dialogue. The Group engaged with affected stakeholders or their internal representatives (such as employees or trade unions), to provide inputs or feedback on the conclusions regarding its material impacts, risks and opportunities. The DMA methodology and results were presented to the ESG Committee, with the integrated inputs received from different stakeholder groups.

### 1.3.3 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

OTP Group has performed a revised double materiality assessment for FY25, accordingly impacts, risks and opportunities were reassessed and updated, based on methodology that is described in detail in IRO-1 subchapter.

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
ESRS E1 Climate change								
Climate change adaptation								
-	Climate-related identified physical risks	Financial risk	Potential	Short-term	Financial services	Downstream, own operation	OTP Group is exposed to various climate-related physical risks that significantly affect the lending activities of its financial institutions and financial enterprises. The Banking group has identified and assessed the most relevant acute and chronic physical risks related to its credit portfolio. Among all the identified risks, the most relevant ones are changes in air temperature, heat stress, heat waves, drought, water stress, fluvial flood and heavy rainfall. The most exposed sectors in the portfolio include construction, real estate, energy, agriculture, wholesale and retail trade and transportation, which pose higher credit risk to the Banking group.	OTP banking group's Risk Strategy includes measures on managing climate risks, including physical risks.
-	Climate related physical risks	Financial risk	Potential	Short-term	Agricultural activities	Own operation, upstream	The agricultural sector is highly exposed to various climate-related physical risks, as climate change affects crop yields, the availability of agricultural products, and livestock farming (e.g.: heatwaves, frequent droughts, greater rainfall variability increasing water demand, heat stress on plants, and lower animal productivity).	No formal strategic initiative has been outlined yet.

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
Climate change mitigation								
-	<b>GHG emissions in the portfolio</b>	Negative impact	Actual	Short-term	Financial services	Downstream, own operation	By financing carbon-intensive sectors and activities (such as construction, transportation, manufacturing), OTP Group's financial institutions and enterprises have financed GHG emissions through their credit portfolio and the fund management's product portfolio, which contributes to negative environmental impacts.	OTP banking group established targets to reduce its financed GHG emissions by 2030 in its 2021-2025 ESG Strategy and 2026-2028 Sustainability Strategy.
-	<b>GHG emissions in own operations</b>	Negative impact	Actual	Short-term	Financial services	Own operation	The GHG emissions from OTP Group's own operations (e.g. own buildings such as offices and branches, as well as fleet vehicles) contribute negatively to climate change.	OTP Bank adopted a decarbonisation plan for its own operations in its 2026-2028 Sustainability Strategy, which will be gradually extended to its subsidiaries as well.
-	<b>GHG emissions in own operations</b>	Negative impact	Actual	Short-term	Agricultural activities	Own operation, upstream	GHG emissions from agricultural activities are significant, driven by use of fossil fuel-based machinery and equipment, synthetic fertilizers, pesticides, and methane and nitrous oxide emissions from livestock farming.	No formal strategic initiative has been outlined yet.
-	<b>Financing climate change mitigation activities</b>	Financial opportunity	Potential	Medium-term	Financial services	Downstream, own operation	By offering green financial products (such as green lending and ESG funds), OTP Group can strengthen its presence in sustainable financial markets by leveraging potential incentives offered by regulators or national banks while mitigating climate related risks, and can therefore gain financial advantage. Expanding green lending alternatives can support climate change mitigation ambitions in corporate and retail mortgage lending, particularly in the real estate, transportation and electricity/gas supply sectors. Moreover, through its ESG funds, it can promote sustainable investments and offer options for customers interested in sustainability and climate change.	The banking group's 2021-2025 ESG Strategy and 2026-2028 Sustainability Strategy contains green lending targets, that contribute to the financing of climate change mitigation activities.

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
-	Climate-related transition risks	Financial risk	Potential	Short-term	Financial services	Downstream, own operation	<p>Regulatory and reporting requirements for financial institutions are continuously increasing to strengthen their sustainability approach and resilience strategies, reflecting their portfolio's ESG risks.</p> <p>Transition risks – arising from new policies, regulations and technological developments – could affect OTP Group's financial segment by increasing credit risk across its portfolio. For the banks and debtors, non-compliance with regulatory requirements – particularly in non-EU countries – can lead to financial or reputational losses.</p> <p>Transition to more sustainable technologies and regulatory compliance may require increased capital expenditure and lead to higher operational, administrative and compliance costs.</p>	OTP banking group's Risk Strategy includes measures on managing climate risks, including transition risks.
Energy								
-	Financing energy-intensive sectors	Negative impact	Actual	Short-term	Financial services	Downstream, own operation	<p>Financing energy-intensive sectors (e.g. manufacturing, construction) whose activities heavily rely on fossil fuel sources results in high CO2 emissions within the Group financial segment's credit portfolio and the fund management's product portfolio.</p> <p>Major part of the invested assets of OTP Fund Management is linked to companies whose energy- consumption and generation are primarily based on non-renewable sources, especially in sectors such as transportation and storage; electricity; gas; steam and air conditioning supply; water supply; sewerage, waste management and remediation activities; mining and quarrying; construction and real estate; and agriculture.</p>	In 2025 a specific composite limit for certain manufacturing sectors with high GHG emission has been defined, while from 2026 a new limit will be introduced in the Hungarian operation related to electricity generation. The limits are defined in the Risk Appetite Statement and in the Operative Lending Limits and Principles (OLLP) policy. In its 2021-2025 ESG Strategy and its 2026-2028 Sustainability Strategy, OTP Group has set targets to reduce financed greenhouse gas (GHG) emissions by 2030.

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
-	<b>Financing renewable energy or energy-efficient solutions</b>	Financial opportunity	Potential	Short-term	Financial services	Downstream, own operation	Offering green lending and investment options for customers that support the adoption of renewable energy use or energy conservation technologies has the potential to reduce risk exposure related to fossil fuels. This can strengthen the Group's financial segment presence in sustainable financial markets by leveraging potential incentives offered by regulators or national banks. Moreover, through its ESG funds, OTP Group can promote sustainable investment products and provide options for customers interested in renewable, green energy solutions.	The Banking group's 2021-2025 ESG Strategy and 2026-2028 Sustainability Strategy contains green lending targets, that contribute to the financing of renewable energy and energy-efficient solutions. As part of the Corporate Lending Policy / Operative Lending Limits and Principles (OLLP), financing guidelines and assessment frameworks related to renewable energy generation — one of the key pillars of green lending — have also been established.
-	<b>Financing energy-intensive sectors</b>	Financial risk	Potential	Short-term	Financial services	Downstream, own operation	The volatility of the energy market and availability of fossil fuels could lead to higher default risk and liquidity shortages for customers operating in energy-intensive sectors. OTP Fund Management's PAI indicator measures the extent of issuers' exposure to companies operating in the fossil fuel sector.	OTP banking group's Risk Strategy includes measures on managing climate risks, including transition risks.
<b>ESRS E4 Biodiversity and ecosystems</b>								
Direct impact drivers of biodiversity loss								
Climate change	<b>Climate-related identified physical risks</b>	Negative impact	Potential	Short-term	Financial services	Downstream, own operation	Sectors with a high environmental footprint such as agriculture, construction and real estate, manufacturing, transportation and energy account for a significant share in OTP Group's portfolio. The financed sectors' operation contributes to climate change that has negative effects on biodiversity and ecosystems in general terms.	OTP Group requires its clients in its Environmental and Social Risk Management Framework to comply with all applicable environmental and social laws and regulations and to hold the necessary permits and licenses for their operations, including those related to biodiversity and ecosystems.

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
Land-use change	<b>Climate related physical risks</b>	Negative impact	Potential	Short-term	Agricultural activities	Upstream, own operation	Agricultural activities (growing crops, necessary facilities of animals, feeding and grazing) require large land areas for operation. The exact area of land occupied by a given producer depends on factors such as farming practices, yield potential, and regional conditions.	OTP Group's certain agricultural subsidiaries apply crop rotation practices to maintain soil health and biodiversity, but no formal strategic initiative has been outlined yet.
<b>ESRS S1 Own Workforce</b>								
Working conditions								
Secure employment	<b>Secure employment</b>	Positive impact	Actual	Short-term	Financial services	Own operation	OTP Group is a significant employer in the financial and insurance sector in Hungary and the CEE region, thus its operation is important for providing working opportunities primarily for white-collar workers and contracted partners.	OTP Group's financial segment continues to act as responsible employer (as core pillar of its 2021-25 ESG strategy) to provide adequate contractual framework, supported by HR and compliance control procedures.
Secure employment	<b>Employee benefits</b>	Financial opportunity	Potential	Short-term	Financial services	Own operation	Adequate working conditions with a wide range of employee benefits ensure that employees retain their position, which helps reduce operational costs related to turnover. A safe and supportive workplace also enhances employees' productivity.	OTP Group's financial segment continues to act as responsible employer (as core pillar of its 2021-25 ESG strategy) to provide adequate benefit package, supported by HR and compliance control procedures.
Adequate wages	<b>Adequate wages</b>	Positive impact	Actual	Short-term	Financial services	Own operation	By offering a competitive salary the Group can increase the life standard of employees and their families in light of national economic and social conditions.	OTP Group's financial segment continues to act as responsible employer (as core pillar of its 2021-25 ESG strategy) to provide adequate remuneration package, which is supported by OTP banking group's Remuneration policy and related internal procedures.
Adequate wages	<b>Non-adequate wages</b>	Financial risk	Potential	Short-term	Financial services	Own operation	Inadequate wages (below the living wage or not aligned with market expectations) have negative effects on turnover and performance and can lead to higher operational costs.	

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
Adequate wages	<b>Non-adequate wages</b>	Financial risk	Potential	Short-term	Agricultural activities	Own operation	Inadequate wages (below the regional and market standards) have negative effects on employee availability, turnover and performance, which can increase related operational costs.	OTP Group's agricultural subsidiaries provide wages and benefits for their employees, based on their individual operational standards and internal procedures (by following Hungarian legislation).
Social dialogue	<b>Inadequate employee involvement</b>	Financial risk	Potential	Medium-term	Financial services	Own operation	By ignoring views and interests of employees or their representatives and refusing their involvement in decision-making processes can demotivate employees and decrease productivity and employee satisfaction and ultimately lead to higher operational costs.	OTP Group's financial segment continues to act as responsible employer (as core pillar of its 2021-25 ESG strategy) for enhancing employee engagement.
Equal treatment and opportunities for all								
Gender equality and equal pay for work of equal value	<b>Gender equality and equal pay for work of equal value</b>	Financial opportunity	Potential	Medium-term	Financial services	Own operation	Providing equal opportunities fosters employee motivation, collaboration and well-being, by creating an inclusive and innovative workplace, based on employees' skills and knowledge with equal rights.	OTP Group continues to act as responsible employer (as core pillar of its 2021-25 ESG strategy) for enhancing employee well-being and development, diversity, supported by Remuneration policy.
Training and skills development	<b>Training and skills development</b>	Financial opportunity	Potential	Medium-term	Financial services	Own operation	Dedicated training and skills development are important to improve working processes, increase operational efficiency and implement new technologies, while personal development can create a better working environment and collaboration among employees. By offering proper training and development opportunities, OTP Group can attract and retain talented employee's and improve their motivation, which in turn could result work efficiency and cost reduction.	OTP Group continues to act as responsible employer (as core pillar of its 2021-25 ESG strategy) for enhancing employee well-being and development. OTP banking group's 2026-2028 Sustainability Strategy contains social measures focusing on own employees' skills development, by increasing average training hours and extend PULZE digital program on group-level.
Training and skills development	<b>Insufficient training and skills development</b>	Financial risk	Potential	Medium-term	Financial services	Own operation	A lack of proper knowledge development initiatives can lead to competitive disadvantages, such as missed opportunities in professional growth, reduced market presence, and the loss of talented, well-qualified employees, which ultimately generate additional operational costs.	

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
Measures against violence and harassment in the workplace	<b>Measures against violence and harassment in the workplace</b>	Positive impact	Actual	Short-term	Financial services	Own operation	Continuous awareness-raising and employee education on ethical standards foster a diverse, inclusive corporate culture, which can inspire other employers to adopt similar practices, thus having a broader positive impact on society.	OTP Group continues to act as responsible employer (as core pillar of its 2021-25 ESG strategy) for enhancing ethical behaviour and awareness raising on whistleblowing procedures.
Diversity	<b>Diversity</b>	Financial opportunity	Potential	Medium-term	Financial services	Own operation	Actively supporting diversity and inclusion can enhance employee satisfaction, well-being, and organizational effectiveness. OTP Group can motivate employees, foster innovation, which in turn could result work efficiency, cost reduction and contribute to long-term business and financial success.	OTP banking group's 2026-2028 Sustainability Strategy contains social measures focusing on own employees, including management diversity in succession planning.
<b>ESRS S4 Consumers and end-users</b>								
Information-related impacts for consumers and/or end-users								
Social inclusion of consumers and/or end-users								
Privacy; Data security	<b>Data privacy and cybersecurity breaches</b>	Financial risk	Potential	Short-term	Financial services	Own operation, downstream	OTP Group handles a significant amount of client-related sensitive data and information, thus adequate information protection (risk mitigation and preventive measures to avoid fraud incidents or data loss of clients) is essential in its operational framework. Inadequate IT practices can lead to incidents, cyberattacks, and data security breaches, while causing significant reputational and financial losses to OTP Group, including penalties, legal consequences, and customer dissatisfaction.	OTP banking group's 2026-2028 Sustainability Strategy contains social measures focusing on client's privacy, including data- and cybersecurity. The Group also adopted a Digital Operational Resilience Strategy and OTP Bank developed its Cybersecurity Strategy.
Access to (quality) information; Responsible marketing practices	<b>Awareness raising in financial education and marketing</b>	Positive impact	Actual	Short-term	Financial services	Own operation, downstream	The Group is committed to educate and positively influence its employees, customers and the wider society through various initiatives, including programs and campaigns, to enhance general knowledge on financial products, online banking and related risks (e.g. data breaches, cyberattacks). These awareness raising initiatives aim is to provide educational content accessible to anyone.	OTP banking group's 2026-2028 Sustainability Strategy contains social measures focusing on awareness raising,

Sub-sub topic	Impact, risk or opportunity (IRO)	Category (impact / risk / opportunity)	Actual / potential	Time horizon	Relevant business segment	Value chain relevance	Description of current and potential IROs with their effects	IROs interaction with strategy and business model
Access to (quality) information; Responsible marketing practices	<b>Inadequate information provision to customers</b>	Financial risk	Potential	Short-term	Financial services	Own operation, downstream	Inadequate information provision, misinformation, misunderstanding of financial products' attributes can lead to biased decision-making, dissatisfied customers, and loss of trust in financial institutions' products and/or services. The operation of financial institutions regarding information provision and marketing practices is highly regulated, thus non-compliance could involve regulatory fines and sanctions, loss of reputation and loss of clients. Sales agents, as representatives of OTP Group, interact with a wide range clients or potential clients during their activities. Improper conduct by agents engaged by OTP Group, such as providing misleading information, may represent a risk to the Group.	OTP banking group's 2026-2028 Sustainability Strategy contains social measures focusing on client's awareness raising and data security, including the extension of OTP Bank's Responsible Marketing Strategy on group-level and sharing experiences and know-how about efficient fraud prevention and communication within banking subsidiaries.
<b>ESRS G1 Business Conduct</b>								
Corporate Culture								
-	<b>Weak ethical culture or business misconduct</b>	Financial risk	Potential	Short-term	Financial services	Own operation	Potential cases of unethical behaviour or non-compliance with laws and regulations can result in fines and reputational damage (e.g. cases of corruption and bribery, violation of competition rules, etc.). Sales agents, as representatives of OTP Group, pose a higher risk of misconduct as they are not directly supervised, but fulfil contractual obligations for the organisation, even though they must follow the Group's ethical rules.	2026-2028 Sustainability Strategy contains governance measures, including the improvement of compliance measures and enhancement of ethical business conduct for OTP Group's financial segment.
Money laundering and counterterrorism	<b>Money laundering and counterterrorism</b>	Financial risk	Potential	Short-term	Financial services	Own operation, downstream	Failure to adequately address money laundering and counterterrorism could sustain or even increase criminal activities, terrorist threats, undermine customer trust, and lead to regulatory sanctions and reputational damage for OTP Group.	2026-2028 Sustainability Strategy contains governance measures, focusing also on topics regarding anti-money laundering for OTP Group's financial segment.

The IRO summary table presents the core financial risks and opportunities identified by the Group and those implications for operations were qualitatively assessed and categorized (in terms of reliance on relationships, influencing future cash-flow or the use of resources) as part of the double materiality analysis. Although further analysis would be necessary to define quantitative financial effects of these risks, OTP Group is in a developing phase to consider the DMA results in its strategy (since the assessment was conducted in the reporting year and the Group did not examine the resilience of its strategy or business model yet).

Regarding the management of potential financial impacts of ESG risks, no provisions have been made for ESG risks, and the management has not established a capital buffer for such risks. Based on the ECB's Novel Risk Recommendation, OTP Group has identified risks in Slovenia (OTP Bank Slovenia) and Bulgaria (DSK Bank) for which impairment has been recognized, as reflected in the consolidated IFRS9 ECL (expected credit loss). The additional capital requirement related to climate risks remains immaterial.

ESG aspects have been included in the Group's rating models as of 2026. In the context of operational risk loss data collection, an ESG flag is used if an ESG risk factor can be identified behind the given loss event. No significant losses were realized in 2025 concerning material topics. The analysis and estimation of expected financial impacts have been initiated and will continue in 2026. OTP Group applied the extended phase-in opportunity provided by the "quick fix" amendments for the analysis and estimation of expected financial impacts of material IROs. The list of phased-in topics is presented in Annex ESRS index.

## 1.4 Impact, risk and opportunity management

### 1.4.1 [IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

OTP Group has performed its first materiality assessment in 2024 that was revised in 2025. The updated double materiality assessment (DMA) was performed to enhance methodology approach, thus reflect on the most relevant sustainability issues. The Group has refined its top-down approach by increasing subsidiaries' involvement level and evolving assessment practices in 2025. The updated DMA was carried out in accordance with ESRS requirements to identify and report on material impacts, risks and opportunities that the Group faces in the reporting year.

The DMA process was conducted at group level with the Sustainability Reporting team's coordination, and it has comprised the following procedure:

**Step 1 - Business understanding** (provide an overview on business activities and relationships in own operation and through the value chain)

OTP Group operates in multiple sectors to varying extents through its consolidated subsidiaries. Accordingly, the initial step of the double materiality assessment was to identify consolidated entities' main activities and evaluate their relevance from financial and impact perspective within the Group operation. Based on the **scoping analysis**, „*financial and insurance activities*” were identified as the Group's core business area from operational significance and impact perspective as well, by covering a major part of its operation. Besides, „*agricultural and food manufacturing*” sector was further evaluated in the DMA, since the sector's environmental impact is considerable, although agricultural subsidiaries operational relevance is lower and concentrated in Hungary within the Group's activities.

Based on OTP Group's most relevant operational segments („*financial and insurance activities*” and „*agricultural and food manufacturing*”), further analysis (value chain and portfolio) and the identification of impacts, risks, and opportunities (IROs) were carried out separately for entities operating within these two distinct sectors.

To define core activities and map the type and nature of business relationships in own operation, upstream and downstream value chain, a detailed **value chain analysis** was conducted based on the most relevant economic activities and significant portfolio sectors of OTP Group, to understand how and where OTP Group's financial and agricultural activities could generate impacts, risks and opportunities and which stakeholder groups could be affected. As a consequent step of the value chain analysis, key stakeholders (internal and external) were identified that are affected or are likely to be affected by the entity's own operations or upstream and downstream value chain.

To identify the most influential downstream impacts and risks, **portfolio analysis** on environmental impacts was conducted in connection with OTP Group's main revenue generating financial activity, corporate lending, to comprehensively identify potentially material sustainability topics and related impacts, risks and opportunities (IROs).

**Step 2 - Identification of potentially relevant sustainability matters** (provide the long-list based on ESRS topics, sub-topics and sub-sub-topics)

The second step focused on identifying a comprehensive list of sustainability topics (based on the list of sustainability matters in ESRS 1 paragraph AR16), where material issues, IROs could arise in relation to own operation (for financial and agricultural activities) and value chain activities. To define the most relevant sustainability topics a benchmark analysis was conducted. Material topics reported by selected industry peers were reviewed, and relevant sector standards recommended by the SASB (Sustainability Accounting Standards Board), along with the focus areas highlighted by ESG rating agencies, were taken into account. Besides that, last year's DMA results were also considered.

**Step 3 - Categorization of ESG topics** (provide the short-list with the most relevant sustainability issues)

As a result of the categorization, prioritization and validation of the ESG topics by OTP Group's internal ESG experts, a short-list was created to summarize the most relevant sustainability matters from the Group's perspective and to serve as the basis for identifying and assessing IROs (impacts, risks and opportunities). The long and short lists were separately assessed for financial services and agricultural activities.

#### Step 4 - Identification and evaluation of IROs (impact and financial materiality assessment)

Starting from the list of relevant environmental, social and governance topics (presented in the short-list) potentially material impacts, risks and opportunities were identified based on value chain and portfolio analysis, experts' insights, internal policies, industry trends and regulations, OTP Group's Climate & Environmental (C&E) Materiality Assessment and other external scientific sources. In the IRO identification process, considerations were made regarding the Group's own operation (separately for financial and agricultural activities) and the related value chain segments (e.g.: portfolio, customers, suppliers).

The identified IROs were evaluated to assess their impact and financial materiality, based on predefined evaluation criteria set (following ESRS guidelines<sup>25</sup>). The assessment was conducted using qualitative characteristics and quantitative scoring with the involvement of the internal ESG experts of OTP Group. Dedicated representatives from OTP Bank's operational departments and from the most relevant subsidiaries in the financial services and agricultural segments have participated in the IRO identification and assessment process. During the IRO assessment and validation, the affected external stakeholders (as presented in SBM-2 subchapter) identified were represented by internal representatives of the Group (acting as proxies for stakeholder groups with appropriate background knowledge, experience and established relationship with the represented external parties).

##### *Impact materiality assessment*

Impacts (I) related to the relevant sustainability matters were identified and categorized as positive/negative and own operation or portfolio related. They were qualitatively assessed according to the nature (actual or potential), to their time horizon (short-, medium- long term), and to their relevance in the value chain (own operations, upstream, downstream).

Regarding the quantitative assessment, negative impacts were assessed by scale, scope and irremediable character, which covered the severity of the impact. Positive impacts were addressed by scale and scope aspects (resulted its severity). In case of potential negative and positive impacts, likelihood was also taken into consideration. Impacts' materiality value was derived from the scoring assessment, based on the matrix of severity score (0-15) and likelihood (1-5), where thresholds (as a multiple level matrix combination of severity (8-15) and likelihood (1-5) scores) were set by OTP Group's involved ESG experts.

##### *Financial materiality assessment*

Similarly to impact materiality assessment, risks (R) and opportunities (O) arising from past and future events were defined, considering dependencies on natural, human and social resources and operational aspects. The risk identification process was complemented with OTP Group's C&E Materiality Assessment, that is prepared for OTP Group's banking subsidiaries to identify material physical and transition risks and consider sectors that are more exposed to climate risks in the financed portfolio.

Risks and opportunities were categorized (own operation or portfolio related) and qualitatively assessed by time horizon (short-, medium-, and long-term), and by relevance in the value chain (own operations, upstream, downstream). Risks and opportunities were considered potential, reflecting on those definition. Risks and opportunities were assessed whether they have financial implications on the continuation of use of resources, reliance on relationships, or other impacts on cash flow. Regarding the quantitative assessment, R&Os were assessed by magnitude and likelihood of the occurrence. The materiality value was derived from the scoring assessment, based on the matrix of magnitude (0-5) and likelihood (1-5), where thresholds (as a multiple level matrix combination of severity (3-5) and likelihood (1-5) scores) were set by OTP Group's involved ESG experts.

As described above in the DMA methodology, OTP Group has assessed and analysed all sustainability topics provided by ESRS 1 AR 16. Regarding environmental sustainability topics of pollution, water and marine resources and resource use and circular economy, impacts, risks and opportunities were also identified and evaluated by ESG experts of the Group, considering own operations and value chain relevance, on short-, medium-, and long-term time horizon. Based on the materiality assessment results these topics were determined as not material in the reporting year.

<sup>25</sup> ESRS, Implementation guidance EFRAG IG1 Materiality assessment

## Step 5 – Summary and validation of results

OTP Group's internal stakeholders (Sustainability Reporting team, ESG representatives of operational areas, first level involvement of subsidiaries) performed the evaluation. Afterwards, field workshops were held by external consultants, where the Group's internal experts and representatives from operational departments could discuss, modify and validate the scoring results, to ensure completeness and evaluation of the defined IROs for each relevant ESG topics. The summarized results were provided for final validation to all involved internal experts, and external stakeholders (by internal proxy representation), and presented to the management of Green Program Directorate. The DMA results were discussed and approved by the ESG Committee, ensuring that the final list of material topics is aligned with the Group's sustainability objectives and strategic goals.

As a result of the double materiality analysis, most relevant sustainability topics were identified for reporting purposes for 2025. OTP Group's Green Program Directorate has coordinated and overviewed of the whole DMA procedure, and final approval was performed by the ESG Committee (as internal control, further internal audit process on the DMA was not performed).

The group level DMA included the inputs and individual assessment of OTP Bank internal ESG experts and major foreign subsidiaries' experts by integrating country and entity specific insights. In order to define material topics at group level for consolidated reporting, a top-down approach was followed, with active involvement of core ESG representatives and subsidiaries, which discussed and validated the results.

The DMA process could provide further insights and considerations for integrating the identified IROs into overall risk management process in the following years.

### *Summary of changes in DMA methodology compared to prior reporting period*

In the previous reporting year (2024), DMA has identified three relevant sectors from operational perspective: financial services, real estate and agricultural sector. For this year (2025) a more detailed quantitative analysis was performed, by involving financial information and ENCORE sectorial environmental impact indicators to define the scope of the most relevant business activities of the Group. As a result of the analysis, financial and insurance activities and agricultural and food manufacturing activities were identified as most relevant operational segments from financial and impact perspective.

Comparing to previous reporting year (2024) online stakeholder questionnaire was conducted among various external stakeholders. For 2025, the opinion of external stakeholders was represented by internal experts.

In the previous reporting year (2024) IRO assessment methodology was relied on a different scoring system. For this year (2025), the scoring approach was refined based on ESRS recommendations (as presented in Step 4 Identification and evaluation of IROs section). Further information on last year DMA process is [presented here](#).

The following subtopics and related IROs were not assessed material in this reporting year, due to methodological refinement and internal experts' insights and evaluation:

- E3 – Water and Marine resources
- S1 – Work-life balance, Health and safety, Employment and inclusion of persons with disabilities
- S4 - Access to financial products and services
- G1 – Corruption and bribery<sup>26</sup>

The following topics are material in this reporting year but were not included in the 2024 DMA:

- S1 – Secure employment, Adequate wages, Social dialogue
- S4 – Responsible marketing practices

<sup>26</sup> Although the subtopic of Corruption and bribery was not evaluated as material in DMA 2025, information about anti-corruption policies and actions is presented in chapter 4.1 Business conduct, as it is an integral part of ethical and compliant business conduct and relates to disclosure requirements of G1.

## 1.4.2 [IRO-2] Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The list of disclosure requirements<sup>27</sup> applied in preparing the sustainability statement is presented in 6. ESRS Index includes a table of all the datapoints that derive from other EU legislation.

The information to be disclosed in relation to material IROs was determined based on EFRAG guidance ID 177 – Links between AR16 and Disclosure requirements.

## 1.5 Reporting policy regarding chapter ESRS 2

Disclosure requirements and data points in the thematic standards of ESRS, are reported, based on the related material sub-topics for OTP Group. To link material topics and disclosure requirements, the Group has implemented EFRAG ID 177 – Links between AR16 and Disclosure requirements guideline, and the identification of data points was based on the interpretation of data point expectations.

### Data points

The Group reports voluntarily reportable data points if the information can be produced without significant effort. The Group has applied phase-in disclosures (in alignment with “quick-fix” provisions) for few material sub-topics, that are presented in the ESRS content index, these data points are not included in the report, while brief description is presented in the relevant topical chapters.

### Policies, Actions and Targets

We disclose available policies, actions and targets in cases when they apply:

- to OTP Bank Plc
- to OTP Group (OTP Bank Plc. and its subsidiaries)
- to OTP Group's financial segment (OTP Group's financial service provider subsidiaries)
- to OTP banking group (OTP Bank and banking subsidiaries)
- to OTP Group's agricultural segment (OTP Group's agricultural subsidiaries)
- to subsidiaries, or for a smaller group that includes these member companies if relevant:
  - Merkantil Bank
  - OTP Mortgage Bank
  - OTP Fund Management
  - DSK Bank (Bulgaria)
  - OTP Bank Slovenia
  - OTP Bank Croatia
  - OTP Bank Serbia
  - Ipoteka Bank (Uzbekistan)
  - OTP Bank Ukraine
  - CKB (Montenegro)
  - OTP Bank Albania
  - OTP Bank Russia

OTP Lakástakarék has a narrow scope of activity, focusing specifically on housing savings and loans, OTP Mortgage Bank focuses specifically on mortgage lending, the companies have a relatively small central organisation, and they use the branch network of the parent bank, the sales agents of OTP Financial Point Ltd. and other sales partners to carry out their specific business activities. The activities of the two subsidiary banks are therefore not presented separately.

Conditional data points for minimum disclosure requirements for policies, measures and objectives are reported if they are relevant to the policy, measure or objective presented.

<sup>27</sup> Material information in relation to material IROs were identified on datapoint level based on EFRAG's guideline on ESRS mapping and disclosure requirements. Besides last year reported GRI KPIs were reconsidered to present for a comparative overview on material topics.

## Metrics

For metrics, the Group aim is to fully report the relevant data points. A threshold value was settled in exceptional cases, specifically for the S1-16 Remuneration Metrics (pay gap and total compensation) disclosure requirement. The threshold value was determined to reduce reporting burdens. The Group refrains from obtaining data for metric components if it is negligible under reasonable assumptions and would require significant effort to determine.

Metrics are not validated by any external body beyond the independent assurance provider.

## Entity-Specific Metrics

The Group has defined entity-specific indicators for those material topics where ESRS has not specified the disclosure related KPIs (for S4 and G1 sub-topics). In these cases, GRI and entity-specific indicators were applied, as it is presented in [BP-2] subchapter.

## Consolidation

Business relationships include those in the undertaking's upstream and downstream value chain and are not limited to direct contractual relationships.

Where associates or joint ventures are accounted for in the IFRS financial statements using the equity method and are part of the Group's value chain, the Bank includes information about them together with the approach used for other business relationships in the value chain. When the Bank determines impact indicators, it does not limit the data for the associate or joint venture to the proportion of equity owned but takes into account the impacts that arise through business relationships related to the Group's products and services. Operational control is defined as the situation where the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation or asset. Operational control is part of the own operation of OTP Group. There are some funds managed by OTP Real Estate Investment Fund Management Ltd. which are not part of the consolidated group, however, in case of Scope 1-2 their emission is collected, calculated and presented in [E1-6] subchapter.

## Governance

The administrative, management and supervisory bodies of OTP Group are the Board of Directors, the Supervisory Board and the Audit Committee of OTP Bank Plc.

The gender distribution of the members of the administrative, management and supervisory bodies, the percentage of female and male members of the body in relation to the total number of members, is based on the number of members at the end of the year.

The proportion of independent members of the boards is the number of independent members divided by the total number of board members at the end of the year. With regard to the independence criteria for board members, the Bank considers the relevant provisions of Act V of 2013 on the Civil Code (Civil Code) to be applicable, the details of which are disclosed in the document "Statement of OTP Bank Plc. on the independence of board members".

## Business model

The breakdown by country refers to countries where the Group has 50 or more employees, and these employees represent at least 10% of the total number of employees.

Region is defined in the report as: country.

Net revenue for the current year, as presented in the consolidated IFRS financial statements of OTP Bank Plc comprises total interest income and incomes similar to interest income, net profit from fees and commissions, and other operating income.

## 2 Environmental information

### 2.1 [E1] Climate change

OTP Group aims to take a leading regional role in financing a fair and gradual transition to a low-carbon economy and shaping a sustainable future. OTP Group strives to effectively manage environmental risks of climate change and help increase its clients' ability to adapt to a sustainable economy. In pursuit of this ambition, the Group significantly expanded its green loan portfolio in 2025 and introduced a climate target-setting framework to guide future actions.

#### E1 SBM-3

The material topics and related IROs for OTP Group under ESRS E1 Climate change are presented below:

E1 – CLIMATE CHANGE			
Material sustainability matters	Identified IRO (category: (+/-) I: positive/negative impact, R: risk, O: opportunity, name and description)		
Downstream - Financial services			
Climate change adaptation	R	<i>Climate-related identified physical risks</i>	OTP Group is exposed to various climate-related physical risks that significantly affect the lending activities of its financial institutions and financial enterprises. The Banking group has identified and assessed the most relevant acute and chronic physical risks related to its credit portfolio. Among all the identified risks, the most relevant ones are changes in air temperature, heat stress, heat waves, drought, water stress, fluvial flood and heavy rainfall. The most exposed sectors in the portfolio include construction, real estate, energy, agriculture, wholesale and retail trade and transportation, which pose higher credit risk to the Banking group.
	(-) I	<i>GHG emissions in the portfolio</i>	By financing carbon-intensive sectors and activities (such as construction, transportation, manufacturing), OTP Group's financial institutions and enterprises have financed GHG emissions through their credit portfolio and the fund management's product portfolio, which contributes to negative environmental impacts.
Climate change mitigation	O	<i>Financing climate change mitigation activities</i>	By offering green financial products (such as green lending and ESG funds), OTP Group can strengthen its presence in sustainable financial markets by leveraging potential incentives offered by regulators or national banks while mitigating climate related risks, therefore can gain financial advantage. Expanding green lending alternatives can support climate change mitigation ambitions in corporate and retail mortgage lending, particularly in the real estate, transportation and electricity/gas supply sectors. Moreover, through its ESG funds, it can promote sustainable investments and offer options for customers interested in sustainability and climate change.
	R	<i>Climate-related transition risks</i>	Regulatory and reporting requirements for financial institutions are continuously increasing to strengthen their sustainability approach and resilience strategies, reflecting their portfolio's ESG risks. Transition risks – arising from new policies, regulations and technological developments – could affect OTP Group's financial segment by increasing credit risk across its portfolio. For the banks and debtors, non-compliance with regulatory requirements – particularly in non-EU countries – can lead to financial or reputational losses. Transition to more sustainable technologies and regulatory compliance may require increased capital expenditure and lead to higher operational, administrative and compliance costs.

E1 – CLIMATE CHANGE			
Energy	(-) I	<i>Financing energy-intensive sectors</i>	Financing energy-intensive sectors (e.g. manufacturing, construction) whose activities heavily rely on fossil fuel sources results in high CO <sub>2</sub> emissions within the Group financial segment's credit portfolio and the fund management's product portfolio. Major part of the invested assets of OTP Fund Management are linked to companies whose energy consumption and generation is from non-renewable sources, especially in sectors such as transportation and storage; electricity; gas; steam and air conditioning supply; water supply; sewerage, waste management and remediation activities; mining and quarrying; construction and real estate; and agriculture.
	O	<i>Financing renewable energy or energy-efficient solutions</i>	Offering green lending and investment options for customers that support the adoption of renewable energy use or energy conservation technologies has the potential to reduce risk exposure related to fossil fuels. This can strengthen the Group's financial segment presence in sustainable financial markets by leveraging potential incentives offered by regulators or national banks. Moreover, through its ESG funds, OTP Group can promote sustainable investment products and provide options for customers interested in renewable, green energy solutions.
	R	<i>Financing energy-intensive sectors (transition risk)</i>	The volatility of the energy market and availability of fossil fuels could lead to higher default risk and liquidity shortages for customers operating in energy-intensive sectors. OTP Fund Management's PAI indicator measures the extent of issuers' exposure to companies operating in the fossil fuel sector.
Own operations - Financial services			
Climate change mitigation	(-) I	<i>GHG emissions in own operations</i>	The GHG emissions from OTP Group's own operations (e.g. own buildings such as offices and branches, as well as fleet vehicles) contribute negatively to climate change.
Own operations - Agricultural activities			
Climate change adaptation	R	<i>Climate related physical risks</i>	The agricultural sector is highly exposed to various climate-related physical risks, as climate change affects crop yields, the availability of agricultural products, and livestock farming (e.g.: heatwaves, frequent droughts, greater rainfall variability increasing water demand, heat stress on plants, and lower animal productivity).
Climate change mitigation	(-) I	<i>GHG emissions in own operations</i>	GHG emissions from agricultural activities are significant, driven by use of fossil fuel-based machinery and equipment, synthetic fertilizers, pesticides, and methane and nitrous oxide emissions from livestock farming.

For a more detailed description of the impacts, risks and opportunities and how OTP Group manages them, see subchapter ESRS 2, [SBM-3] and the following sections of this chapter.

### 2.1.1 [GOV-3] Integration of sustainability-related performance in incentive schemes

#### E1 GOV-3

Information on whether and how climate-related considerations are included in the remuneration of members of the administrative, management and supervisory bodies, the percentage of remuneration linked to such climate-related considerations, and an explanation of these connections are presented in subchapter ESRS 2, [GOV-3].

### 2.1.2 [IRO-1] Description of the processes to identify and assess material climate-related impacts, risks and opportunities

OTP Group has identified and assessed climate-related impacts, risks and opportunities as part of its double materiality assessment, which is presented in subchapter ESRS 2, [IRO-1].

As a regional universal lender, the Banking group's risks arise from its own operations and its relationship with customers through the downstream value chain.

To determine the materiality of climate-related risk drivers, the Banking group conducted a Climate and Environmental (C&E) materiality assessment in line with supervisory expectations (MNB and EBA). The assessment considered current exposures and expert insights from the risk functions of banking subsidiaries. The main findings served as an input for the double materiality assessment which forms the basis of this report.

The assessment of ESG risks in the Banking group's own operations is presented in subchapter [SBM-3] Managing operational risks.

*C&E Materiality Assessment*

OTP Bank has implemented a comprehensive C&E materiality assessment framework to evaluate the materiality of environmental and transition risk drivers across its banking subsidiaries. The methodology was designed to ensure consistency and comparability across all banking subsidiaries by identifying climate-related physical and transition risks over short-, medium- and long-term time horizons. This approach enables the Banking group to maintain uniform expectations and standards while considering country-specific risks.

*Scope and Objectives*

The C&E materiality assessment framework focuses on two primary categories: physical risks – such as acute events (e.g., heatwaves, floods) and chronic phenomena (e.g., temperature changes, water stress) – and transition risks, which arise from regulatory, policy, technological, and market shifts related to climate and sustainability, including transition events that may affect assets, business activities and the value chain.

In line with the binding banking regulation, this assessment considered three-time horizons<sup>28</sup>:

- Short-term: up to 1 year
- Medium-term: 1-5 years
- Long-term: beyond 5 years

The Banking group's stress-testing methodology complements the C&E risk assessment with forward-looking, scenario-based risk evaluation. To assess the impact of material risks on credit losses, the Banking group applies climate scenario analysis to test the resilience of the corporate credit portfolio, leveraging the Network for Greening the Financial System (NGFS) climate scenarios, as detailed in subchapter [SBM-3] Stress test.

*Methodological Steps*

The methodology comprises the following structured steps:

<b>Country-Specific Risk Relevance Filtering</b>	From a taxonomy of 69 C&E risks, each subsidiary identified the risks relevant to its national context, while excluding those deemed irrelevant from further examination.
<b>Risk Scoring by Probability and Severity</b>	For each relevant risk, expert judgment was applied to assign scores for: <ul style="list-style-type: none"> <li>• Probability: Likelihood of occurrence (Rarely, Occasionally, Frequently, Always)</li> <li>• Severity: Potential impact (Low, Medium, Medium-High, High)</li> </ul> These scores were determined separately for each time horizon.
<b>Aggregation of Risk Scores</b>	Probability and severity scores were aggregated to create a composite risk score for each time horizon. This aggregation reflects country-specific risk profiles.
<b>Industry Exposure Mapping</b>	Each risk was mapped to the affected industries, and for nature-related risks, reverse mapping was also performed to identify industries that contribute to environmental degradation. This step makes the assessment entity-specific, in addition to the country-specific elements.

<sup>28</sup> OTP Group applies a three-year time horizon for its corporate strategic planning processes, however for ESG risk assessments it is considered insufficient to capture long-term sustainability impacts. Consequently, for the C&E Materiality Assessment, OTP Group adopted a five-year time horizon to ensure a more comprehensive evaluation of potential risks and opportunities.

<b>Portfolio Exposure Quantification</b>	The proportion of the credit portfolio exposed to each risk is calculated by segment (retail, corporate, specialized lending) and by industry. Exposure levels were classified into four risk categories (Low, Medium, Medium-High, High), facilitating the identification of highly exposed activities.
<b>Materiality Calculation</b>	Materiality is calculated as the sum of: <ul style="list-style-type: none"> <li>• Aggregated probability and severity scores</li> <li>• Exposure share of the affected portfolio</li> </ul> This calculation was performed for each time horizon and each risk.
<b>Collateral Risk Assessment</b>	Collateral types were evaluated for their vulnerability to C&E risks. The proportion of at-risk collateral was quantified based on market value.
<b>Institution-Specific Adjustments</b>	Subsidiaries could incorporate additional institution-specific data (e.g. age distribution of debtors in the Private Individual (PI) segment) to refine the assessment.

#### *Group-Level Harmonization*

To ensure comparability across banking subsidiaries, OTP Bank mandated the use of a standardized methodology; each entity conducted its own assessment, but results were mapped into a unified framework. This enabled the evaluation of consolidated Banking group-level risk profiles, identifying the most exposed industries and risk types, and conducting the double materiality assessment.

### **2.1.3 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model**

Regarding the prudential framework, notable progress was achieved by European regulators and competent authorities during the reporting period. The Banking group continues to make progress in implementing the recommendations. Central to this effort, the development of the ESG risk culture is based on the Hungarian National Bank's (MNB recommendation 10/2022 (VIII.2.) Green Recommendations, which lays out the supervisory expectations regarding climate change and environmental risks. As of the reporting date of this report, the Hungarian authorities have fully adopted the EBA ESG Risk Management Guidelines and plan to incorporate the EBA's Environmental Scenario Analysis Guidelines. Furthermore, the Recommendation No 9/2024 (IX.24.) of the Hungarian National Bank on the use of a minimum set of questions to assess environmental, social and governance information in the underwriting, measurement, management and control of credit risk is observed in the credit underwriting practices.

Since its inception, the implementation of MNB recommendations has followed a phased approach. In line with this phased approach, the Board of Directors, the Management Committee, the ESG Committee, as well as the Risk Management Committee continue to oversee the ESG risk management practices and receive quarterly updates on progress and developments.

The Banking group is fully committed to transparency and compliance with European regulations and supervisory requirements. The Banking group monitors the updates to the supervisory expectations of the European Banking Authority (EBA) and the European Central Bank (ECB). The ECB has direct supervisory authority (Joint Supervisory Team, JST) over DSK Bank in Bulgaria and OTP Bank Slovenia, DSK Bank, OTP Bank Slovenia and OTP Bank Croatia have integrated ESG Risk factors into their risk management systems in line with national legislation and supervisory expectations.

The Banking group's ESG risk management framework is configured around four fundamental lines of action across the different phases of the risk cycle:

- Identification is carried out by materiality assessments and heatmaps.
- Client-level risk assessment is based on exposure method (ESG risk classification, due diligence), lending guidelines and ESG-related portfolio limits in corporate lending.
- Key risk measurement areas have been identified for further development, such as client and collateral evaluation, risk cost overlays as well as advancing environmental risk in the ICAAP exercise.
- The development of a transition plan has been initiated. A key element of this process is portfolio decarbonisation planning, which serves as a key strategic input to the risk-based transition planning, as required by the CRD<sup>29</sup> VI.

<sup>29</sup> Capital Requirements Directive

## Stress test and climate resilience analysis

For each material climate-related risk identified in the double materiality assessment, OTP Group discloses in the climate-related IRO table presented in the beginning of chapter E1 whether the risk is considered a transition risk or a physical risk.

OTP Group first conducted a climate stress test in 2023 and continues to advance its approach in line with the supervisory expectations. In 2025, OTP Bank conducted the short-term analysis building on the 2024 Fit for 55 exercise of the European Banking Authority. The results were presented to and approved by the Board of Directors as part of the annual Internal Capital Adequacy Assessment Process (ICAAP).

Within ICAAP, ESG risks are evaluated holistically across the usual financial risks. The OTP banking group is making significant efforts to adopt changes in the risk models to properly capture climate environmental risks in its cross-functional processes. As the Supervisory Review and Evaluation Process (SREP) includes ESG risks, the Bank is committed to continue developing its tools and stress-testing capabilities to comply with the regulatory expectations.

The 2025 climate stress test examined OTP banking group's exposure utilizing two lenses on climate risks:

- Short- to medium-term (8 years) view with a focus on transition risks
- Long-term view (until 2050) which considered transition and physical risks along three NGFS climate scenarios to capture the impact of an orderly transition, disorderly transition, as well as the Hot House World.

The analysis covered credit risks in the corporate portfolios and addressed the trading book, and operational risk as well.

- Transition risk: Assessed via carbon intensity (GHG emissions per unit of GDP) of OTP Group's operating countries.
- Physical risk: Evaluated using country-level risk ratings provided by recognized organizations.

As part of the long-term analysis, loan losses were quantified considering three NGFS macroeconomic scenarios. To ensure comparability, these projections incorporated results from the European Central Bank's 2021 top-down stress test.

Under the orderly and disorderly transition scenarios, short-term loan losses were modest. By contrast, the hot house scenario analysis indicated an increase of loan losses by around 15 basis points by 2050. The results of the analysis did not indicate changing the strategy and business model.

The Banking group also developed a mid-term corporate credit risk model focusing on transition risks, as the long-term strategic assessment of the Banking group's exposure to climate change revealed that the Group – and the CEE countries in which it operates – are more exposed to climate change-related transition risks than their Western European counterparts. This model estimates default rates across sectors using gross value added (GVA) paths from the one-off "Fit for 55" climate scenario analysis conducted in 2024 by the European Supervisory Authorities (EBA, EIOPA, and ESMA – the ESAs) together with the European Central Bank (ECB).

## The interpretation of OTP Group's actions and targets related to climate change mitigation

As OTP Group's main operations are in the financial services segment, its primary operations differ significantly from sectors with direct production or high physical emissions. Consequently, the nature of climate change mitigation and related risk management varies substantially between the Group's own operations and its downstream value chain, which consists primarily of its financed portfolio. Similar to most institutions in the financial sector, the Group's GHG emissions and associated impacts are considerably higher through its financing activities than through its direct operational footprint. This distinction requires tailored strategies and measures for each area.

To address these differences effectively, the Group applies a dual approach. For its own operations, efforts focus on reducing direct emissions, improving energy efficiency, and integrating climate resilience into facilities and processes. For the financed portfolio, the emphasis is on aligning lending and investment activities with low-carbon transition pathways, assessing climate-related risks in credit decisions, and supporting clients in adopting sustainable practices. These measures are complemented by scenario analysis, portfolio stress testing, and engagement with stakeholders to manage transition and physical risks.

Accordingly, the following section of this report is structured into two parts: Climate change mitigation and adaptation in OTP Group's own operations and Climate change mitigation and adaptation in the Group's financed portfolio, reflecting the distinct challenges and management approaches required for each domain.

OTP Group has defined two distinct GHG emission reduction targets, reflecting the different sources of emissions within its operations and value chain.

### 1. Targets for Own Operations

OTP Bank has adopted its decarbonisation plan in 2025, covering Scope 1 and Scope 2 emissions from its direct operations. This plan sets specific reduction targets for emissions originating from real estate and the vehicle fleet, with a target year of 2030. The Bank established its targets based on the NGFS scenario and set the base years for 2021 and 2024.

The target value was set considering both feasibility and ambition. Based on the measures implemented so far, the targets may be achieved earlier than planned, and OTP Bank intends to maintain these measures in the coming years. At present, the plan applies exclusively to OTP Bank, however, it is designed for gradual extension to the entire OTP Group over time, ensuring consistent implementation across subsidiaries.

### 2. Targets for Financed Emissions

OTP banking group has established targets to reduce financed GHG emissions by 2030. These targets are aligned with the composition of the Banking group's lending portfolio and take into account country-specific exposures and portfolio segmentation by borrower activity type. The scope of these targets covers emissions associated with financing activities directly provided by members of the Banking group. They do not include emissions linked to assets managed by OTP Group's asset and fund management entities, which are subject to separate considerations.

OTP Group's targets for GHG emissions		
	Base year (tCO <sub>2</sub> e)	2030 Target (tCO <sub>2</sub> e)
OTP Bank's target for emissions from its own-use real estates (market-based)	18,977 (2021)	11,101
OTP Bank's target for emissions from its vehicle fleet	2,412 (2024)	2,219
OTP banking group's target for all financed GHG emissions (including financed Scope 1, 2 and 3)	25,007,832 (2023)	21,898,327*

\*Note: target value was revised. In the 2024 Sustainability Report, the value presented as the 2030 target is 16,855,279. More details in section [E1-4] Targets related to climate change mitigation and adaptation  
The total gross indirect emissions of OTP Group (Scope 3) do not include funded emissions related to assets managed by the Group's subsidiaries acting as fund managers, as these assets are not part of the Group's consolidated assets (as they are not owned by OTP Group).

OTP Group's GHG emission reduction targets related to its own operations apply exclusively to OTP Bank's own-use properties and vehicle fleet. Own-use properties are defined as those where the Bank is the contracted party of the utility service providers. The targets were set using different base years, taking into account data availability and methodological considerations: the base year for properties is 2021, while for the vehicle fleet it is 2024, which best reflects the current fleet composition and represents the last year prior to the start of emission reduction measures. Based on estimated data for 2025, emissions from OTP Bank's own-use properties and vehicle fleet together account for 4.1% of OTP Group's total Scope 1-2 emissions calculated on a market-based basis.

In the case of properties, emissions have decreased significantly compared to the base year, primarily due to the purchase of renewable electricity; as a result, emissions from the affected properties are already below the target value set for 2030. Maintaining this target ensures an emission reduction pathway consistent with at least a net-zero climate trajectory by 2030. For the vehicle fleet, emission levels in 2024 and 2025 are essentially unchanged, as emission reduction measures – in particular electrification – had not yet commenced during this period. With regard to its own operations, OTP Bank Nyrt. follows a net-zero-focused climate pathway consistent with the Paris Agreement's 1.5°C ambition.

Given that more than 99% of OTP Group's total GHG emissions fall within Scope 3, the targets related to own operations primarily serve the decarbonisation of operational activities, while the substantive coverage of the Group's climate targets is ensured by targets related to financed emissions.

## Climate change mitigation and adaptation in the Group's own operations

### 2.1.4 [E1-2] Policies related to climate change mitigation and adaptation

#### 2.1.4.1 Decarbonisation of own operations

OTP Bank has developed a Scope 1 and 2 decarbonisation plan, targeting emissions from its own-use real estate portfolio and vehicle fleet, aiming to mitigate the negative impact of GHG emissions in the Bank's own operations. The plan is designed to comply with the European Sustainability Reporting Standards (ESRS) and aligns with the Hungarian National Bank's Green Recommendations. The plan adopts the NGFS Net-Zero 2050 scenario tailored to Hungary, ensuring consistency with the Paris Agreement's 1.5°C climate objective and sets mandatory actions and targets to be achieved by 2030. The plan currently applies only to OTP Bank, with its group-wide extension planned in the coming years.

The scope of the plan covers all buildings and vehicles under OTP Bank's direct operational control, where energy procurement and consumption are managed internally, meaning that OTP Bank is the contracting party towards the service providers. The plan excludes Scope 3 emissions, some of which are addressed separately in the financed emissions chapter. Implementation responsibility is assigned to the Executive Steering Committee. Annual planning and execution are mandated, with oversight and reporting obligations defined.

The plan integrates third-party standards and methodologies, including the PCAF framework for vehicle emissions. Stakeholder engagement is both internal and external: internally, it involves departments responsible for strategy, planning, real estate, and fleet management; externally, it includes cooperation with Pilisi Parkerdő Zrt. to develop a methodology for potential nature-based carbon sequestration as part of the OTP Green Forest project. Carbon sequestration through this project has not yet been calculated and only forecasted, as the primary focus is to improve the ecological state and biodiversity of this dedicated forest section, as well as improving ecosystem services, such as the recreational function of the area.

The plan is designed to be accessible and actionable for all stakeholders involved in its implementation. It is formally submitted to the Executive Steering Committee and integrated into the Bank's annual planning cycle, ensuring that relevant departments receive clear mandates and budgetary guidance. Implementation responsibilities are clearly assigned in the plan.

OTP Bank's Scope 1 and 2 decarbonisation plan addresses climate change mitigation, adaptation, energy efficiency and renewable energy deployment.

OTP Group's agricultural subsidiaries and other financial service provider subsidiaries did not implement policies in line with the ESRS requirements related to climate change mitigation and adaptation.

## 2.1.5 [E1-3] Actions and resources in relation to climate change policies in own operations

E1 – Climate change			
Material sustainability matters	Identified IRO	Group-level targets	Group-level actions
Own operations - Financial services			
Climate change mitigation	(-) I	GHG emissions in own operations	No Financial group-level ESRS compliant target or action is available.
			<p>OTP Bank developed a decarbonisation plan for its own operations containing 2030 targets and related actions. OTP Bank plans to achieve a 41.5% GHG reduction in real estate emissions by 2030 compared to the 2021 baseline, and an 8% GHG reduction related to the vehicle fleet compared to the 2024 level.</p> <p>Green electricity procurement Electrification of heating systems Energy-efficiency improvements Vehicle fleet electrification Charging infrastructure expansion Nature-based offsetting</p>
Own operations - Agricultural activities			
Climate change adaptation	R	Climate related physical risks	No agricultural subsidiary-level target or action is available.
Climate change mitigation	(-) I	GHG emissions in own operations	No agricultural subsidiary-level target or action is available.

### 2.1.5.1 OTP Bank's decarbonisation plan

OTP Bank's decarbonisation plan with regards to its own emissions prescribes a series of operational measures to reduce emissions starting in 2026. For real estate, the Bank commits to maintaining 100% green electricity procurement, expanding electrification through heat pump installations, and implementing energy-efficiency upgrades. These measures are embedded in renovation principles and supported by building automation systems and solar panel installations. In 2026, a detailed assessment of the ten highest-emitting buildings is planned to identify further emission reduction opportunities, with the Babér 9 office building in Budapest serving as a pilot project.

For the vehicle fleet, the Bank intends to replace 100 internal-combustion vehicles with electric ones by 2030, beginning with 20 replacements in 2026. This transition is supported by telematics analysis and a dedicated fleet optimization software. The Bank also plans to expand its charging infrastructure, both centrally and regionally in Hungary. Additional potential activities include the development of internal guidelines for electric vehicle use, training programs, and incentive schemes for voluntary electrification of personal-use vehicles.

The Bank currently offsets residual emissions through carbon credit purchases, but plans to transition to nature-based solutions, such as the OTP Green Forest project, if found feasible. This initiative aims to enhance biodiversity and ecosystem services while contributing to carbon sequestration. The project is being developed in cooperation with Pilisi Parkerdő Zrt., with scientific validation provided by the University of Sopron. Details about OTP Group's current carbon offsets are presented in subchapter [E1-7].

The implementation timeline is structured around five-year planning cycles, with the first milestone set for 2030. Capital planning is integrated into the Bank's annual budgeting process. Investments are treated as forward-looking costs due to uncertain short-term returns. Each measure is evaluated based on its emission-reduction potential and financial feasibility. While specific measures beyond 2030 are not yet fully defined, the plan includes indicative projections and a commitment to maintain consistency with the Paris Agreement's 1.5°C pathway.

OTP Bank plans to achieve a 41.5% GHG reduction in real estate emissions by 2030 compared to the 2021 baseline, and an 8% GHG reduction related to the vehicle fleet compared to the 2024 level.

OTP Bank allocates financial and operational resources to its Scope 1 and 2 decarbonisation plan through its annual planning and budgeting process. Current resources include capital expenditures for electrification of buildings and vehicles, energy-efficiency upgrades, and development of charging infrastructure. Operational expenditures cover maintenance, monitoring, and offsetting activities, such as the OTP Forest project.

Future resources are planned in five-year cycles, with indicative projections extending to 2050. The implementation of actions depends on several preconditions, including market developments (e.g., achieving price parity of electric vehicles), regulatory clarity (e.g., carbon pricing methodology), and operational experience gained during pilot phases (e.g., the 2026 vehicle electrification program).

No sustainable finance instruments are currently linked to the action plan. The plan is internally financed, with no external funding terms or instruments referenced in the decarbonisation plan.

The decarbonisation plan provides specific estimates of current financial resources allocated to selected measures. These amounts are treated as forward-looking costs and are not explicitly reconciled with the Bank's published financial statements. The plan recommends that financial decisions be made during the annual planning cycle, using a standardised cost-benefit template, but does not contain direct accounting linkages.

The decarbonisation plan includes indicative future cost projections for key measures. For vehicle fleet electrification, the Bank plans to replace 100 internal-combustion vehicles by 2030. In the first action year, it will replace 20 ICE cars with electric vehicles, with an additional annual cost estimated at HUF 29 million in 2026.

For real estate<sup>30</sup>, future costs are not aggregated but are expected to arise from targeted energy-efficiency investments and electrification of heating systems. OTP Bank's cost planning for real estate and vehicle fleet management is typically conducted on an annual basis. The costs of decarbonisation measures can only be realistically projected in the short term, as their return on investment depends on several non-price factors – for example, the availability of charging infrastructure for electric vehicles. Consequently, decisions regarding projected costs and savings for the coming years are made during the annual planning process, taking into account the emission reductions required to achieve the Bank's 2030 decarbonisation targets.

#### **2.1.5.2 Subsidiaries' measures to reduce Scope 1-2 emissions**

No Financial group-level ESRS compliant action is available, primarily, the larger banks within the Banking group are implementing or planning to implement measures to reduce carbon dioxide emissions across their own operations. The highest-impact action is the procurement of green electricity, OTP Bank, OTP Bank Slovenia, OTP Bank Croatia, OTP Bank Serbia and DSK Bank mainly covered their consumption with green electricity in 2025, and this practice is expected to continue in 2026. In parallel, most of the subsidiaries are progressing (e.g. lighting, boiler, heating/cooling optimization, insulation and solar panels), while fleet decarbonisation is advancing through electric vehicle purchases in OTP Bank Albania, OTP Bank Slovenia and OTP Bank Ukraine, with OTP Bank Serbia planning similar steps in 2026. The effectiveness of implemented measures is monitored at the subsidiary level, results and associated expenditures are not aggregated at Group level.

#### **2.1.5.3 Managing operational risks across the Banking group**

Severe weather events pose operational risks to the Banking group, particularly in terms of business continuity. Additionally, reputational risk may arise from inadequate adaptation to evolving regulatory and supervisory expectations related to ESG factors.

The Banking group began integrating ESG considerations into its operational risk framework in 2021. This approach has remained consistent through 2025. ESG-related risks are assessed annually as part of the Banking group-level process-based Risk and Control Self-Assessment (RCSA). During this exercise, respondents evaluate the risks identified in their own processes from an ESG relevance perspective. As part of its scenario analysis practice, the Bank also assesses climate change risk and other ESG factors.

The Banking group applies an ESG operational risk tolerance threshold, which is monitored quarterly. ESG-related loss data are also tracked, with particular attention to the quality and reliability of ESG data inputs. This monitoring supports the Banking group's broader ESG risk management strategy and ensures alignment with regulatory expectations.

<sup>30</sup> For real estate, aggregate future capital expenditure related to energy-efficiency investments and the electrification of heating systems is not disclosed separately for reasons of commercial sensitivity; only the main cost categories are described.

## 2.1.6 [E1-4] Targets related to climate change mitigation and adaptation

### 2.1.6.1 OTP Bank's decarbonisation plan

OTP Bank in its own operations decarbonisation plan has set Scope 1 and 2 emission-reduction targets for 2030. For real estate, the baseline year is 2021<sup>31</sup>, with a targeted 41.5% reduction in market-based emissions by 2030. Internal projections suggest a 79% reduction is achievable, primarily through green electricity procurement and electrification. For the vehicle fleet, the baseline year is 2024<sup>32</sup>, with an 8% reduction targeted by 2030. These targets have been set to manage the material climate-related impacts, risks and opportunities associated with OTP Bank's own operations identified in the double materiality assessment and operationalise the climate change mitigation and adaptation policies described under Disclosure Requirement E1-2 and are designed to track their effectiveness over time. The targets are defined consistently with the Scope 1 and 2 GHG emissions reported under Disclosure Requirement E1-6, using the same organisational and operational boundaries.

Progress is monitored annually by the responsible departments, including the Green Program Directorate and the Vehicle Department. The 2030 milestone will trigger a comprehensive review to define post-2030 objectives. Monitoring includes both quantitative indicators - such as annual emissions and energy consumption - and qualitative assessments of operational feasibility and stakeholder acceptance.

The emission-reduction targets defined in the decarbonisation plan are based on the NGFS Net-Zero 2050 Phase 5 scenario, specifically adapted for Hungary. This scenario was selected to ensure consistency with the Paris Agreement's 1.5°C climate objective, as required by ESRS. The scenario provides sector-specific emission trajectories for residential and commercial buildings and transportation, which were used to derive OTP Bank's targets for its own-use real estate and vehicle fleet.

The methodology includes the use of absolute emission values (tCO<sub>2</sub>e) and five-year planning cycles. Emission factors for electricity, natural gas, and district heating were calculated using national averages, with adjustments for green electricity procurement based on guarantees of origin (GoO). For vehicle emissions, the PCAF methodology was applied, using vehicle-specific emission factors and telematics data.

The targets are aligned with EU climate legislation, including the EU Climate Law (Regulation 2021/1119) and the CSRD. Consideration of national requirements is ensured through reference to the Hungarian National Bank's Green Recommendation (10/2022)<sup>33</sup>.

The targets are based on conclusive scientific evidence, as the NGFS Net-Zero 2050 scenario is a peer-reviewed, internationally recognised climate-modelling framework. The scenario provides granular emission pathways for Hungary's building and transport sectors, which were used to derive OTP Bank's 2030 targets. The emission-reduction potential of specific measures (e.g., heat pump installation, vehicle electrification) is calculated using validated emission factors and consumption data. The targets have not been externally assured, but the underlying assumptions and calculations were reviewed and validated by the Green Program Directorate.

Critical assumptions include future developments that may affect emissions and reduction potential:

- Market factors, such as the cost and availability of electric vehicles and heat-pump technologies.
- Regulatory developments, including potential introduction of internal carbon pricing and stricter building-energy standards.
- Operational experience, particularly from pilot programs (e.g., 2026 vehicle electrification).
- Customer and employee preferences, especially regarding vehicle use and acceptance of electrification.
- Technological advancements, such as improved energy-efficiency systems and charging infrastructure.

These factors are expected to influence both the Bank's emissions trajectory and the feasibility of achieving the defined targets.

<sup>31</sup> Since 2021, following the COVID-19 pandemic, OTP Bank launched a comprehensive campaign to optimize energy consumption in its real estate operations and identify opportunities for emission reduction. This initiative was driven by two key factors: the sharp increase in energy prices during 2021–2022 and the growing prominence of sustainability objectives. For these reasons, 2021 has been designated as the baseline year for related performance measurements.

<sup>32</sup> The baseline year for OTP Group's vehicle fleet is 2024, as this is the first year for which complete and detailed data is available, including annual mileage and fuel consumption figures required for analysis.

<sup>33</sup> Paragraph 26 b): Credit institutions develop a carbon neutrality plan in line with climate-related and environmental sustainability objectives and this recommendation. These efforts are also in line with the objective of Article 2(1)(c) of the Paris Agreement: "Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development".

The decarbonisation plan relies on several key levers, each contributing to the overall reduction in Scope 1 and 2 emissions.

#### *Green Electricity Procurement*

Since 2022, OTP Bank has sourced 100% of its electricity from renewable sources. This measure alone reduced Scope 2 emissions from 18,967 tCO<sub>2</sub>e in 2021 to 7,229 tCO<sub>2</sub>e in 2022. It remains the most significant contributor to emission reduction.

#### *Electrification of Heating Systems*

The Bank is replacing fossil fuel-based heating with electric heat pumps in branches and central buildings. Initial installations in 22 branches contribute to Scope 1 emission reductions.

#### *Energy-Efficiency Improvements*

Renovation principles now include energy efficiency upgrades, supported by building automation systems and solar installations at 19 branches. These measures reduce both energy consumption and emissions.

#### *Vehicle Fleet Electrification*

OTP Bank plans to replace 100 internal combustion vehicles with electric ones by 2030. The first phase in 2026 involves 20 vehicles, with an expected reduction of 42 tCO<sub>2</sub>e. The full program is projected to reduce emissions by approximately 630 tCO<sub>2</sub>e between 2024 and 2030. As a result, emissions in 2030 are expected to be around 210 tCO<sub>2</sub>e lower than in the base year.

#### *Charging Infrastructure Expansion*

The Bank has committed to assess current and potential charging points in-house and also through service providers. The aim is to support vehicle electrification and reduce operational barriers.

#### *Nature-Based Offsetting*

The OTP Green Forest project, developed with Pilisi Parkerdő Zrt., will sequester residual emissions while enhancing biodiversity. It is funded with HUF 228 million over ten years and contributes to long-term environmental value creation.

Each lever is quantified in terms of cost, emission-reduction potential, and implementation timeline, forming an integrated plan to meet the 2030 targets and align with the 2050 net-zero objective.

OTP Bank in the target setting focuses on properties where it could influence consumption, covering around 250 sites including branches, offices, and server rooms. Scope 1 emissions come from natural gas usage, while Scope 2 include mainly purchased district heating and electricity consumption. Scope 2 emissions included in the 2030 reduction target are calculated as market-based emissions consistently with the Group's reporting approach. The consumption of the remaining electricity is estimated using the residual mix, while the emissions from district heating and natural gas are estimated based on the national average emission factors. While renewable electricity purchases supported by guarantees of origin are determined based on their actual emission factor reflected with a significantly lower, in some cases zero, emission factor, therefore the achieved emission reduction could be presented in this report. During the determination of the calculation methodology, the base year emissions were recalculated.

Stakeholder involvement in target setting was ensured through internal consultations with relevant departments, including the Property Management Unit, the Car Management Unit, the Strategic, Planning and Controlling Directorate, and the Green Program Directorate. These units provided input on feasibility, cost estimation, and operational constraints.

Pilisi Parkerdő Zrt., acting as an external stakeholder, was involved in the planning of the OTP Green Forest project, which contributes to offsetting residual emissions and enhancing local environmental value.

*Group-level extension*

Currently, the decarbonisation plan applies exclusively to OTP Bank. From 2026 onwards in at least two waves, the Group's banking subsidiaries will be required to define their own emission-reduction targets. To support this process, OTP Bank will provide a methodological manual outlining minimum criteria for target setting.

These targets will be based on country- and sector-specific, net-zero-aligned climate scenarios, where such scenarios are available. OTP Bank will also assist subsidiaries in developing their commitments and validating the targets they set.

Involving non-banking subsidiaries in the target-setting process presents significant complexity due to the heterogeneity of activities across the consolidated Group and therefore requires significantly more time.

## Climate change mitigation and adaptation in the Group’s financed portfolio

### 2.1.7 [E1-2] Policies related to climate change mitigation and adaptation

#### 2.1.7.1 Key policies in ESG risk management

OTP Bank and its banking subsidiaries integrate ESG risk considerations into their lending activities to ensure alignment with sustainability objectives and regulatory expectations. The management of these risks is primarily governed by a set of Banking group-level and subsidiary-level policies that define principles for responsible financing, climate risk integration, and support for the transition to a low-carbon economy. The key policies are summarized in the table below.

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Group Credit Risk Policy</b>				
<i>Climate-related identified physical risks</i>	As the Banking group continues to expand its international exposure, the complexity of lending processes and the range of credit products have increased. This policy establishes the minimum credit-risk management requirements at the Banking group level to ensure an efficient and structured risk management process. The primary objective of credit risk management is to enable safe business growth by maintaining the quality of the loan portfolio while staying within the Banking group’s risk appetite.	This is a Banking group-wide policy, applicable to domestic and international banking subsidiaries, in addition to financial subsidiaries, including leasing companies.	The policy is reviewed annually and approved by OTP Bank’s Board of Directors.	MNB expects financial institutions under consolidated supervision to consider group-level risk-management requirements, including ESG-related risks, within the general risk management requirements established by law, as outlined in the MNB Recommendation 11/2022 (VIII.2.) on credit-risk undertaking, measurement, management, and control (paragraph 18). The policy is in line with the EBA guidelines on loan origination and monitoring (EBA/GL/2020/06).
<i>Climate-related transition risks</i>	The Banking group takes a holistic approach to environmental and climate risks as part of ESG risks, and ESG risks are integrated into the risk management framework for the main risk types. An ESG credit-risk management framework has been incorporated into the Group Credit Risk Policy, which sets out methodology for assessing ESG risks for the non-retail segment and leasing transactions (see [SBM-3] credit risk subchapter) The objective of the non-retail ESG credit risk assessment process is to ensure that the Banking group provides responsible financial services and assigns ESG risk categories to clients and transactions. The Banking group applies an ESG exclusion list, it has developed an ESG risk heatmap and classifies individual clients and transactions into ESG risk categories. This classification is influenced by ESG-focused client due diligence, which is conducted based on predefined criteria. The information obtained through this process is integrated into the Banking group’s risk-based decision-making procedures. The policy is related to significant risks identified in the loan portfolio concerning climate change mitigation, climate change adaptation, and energy transition. The policy considers the interests of key stakeholders through the relevant departments involved in the policy development and review process, such as the Credit Risk Management Directorate and Risk Management Division. The policy is made available to affected stakeholders through direct contact and internal policy library.			

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Corporate Lending Policy / Operative Lending Limits and Principles (OLLP)</b>				
<i>Climate-related identified physical risks</i>	The Corporate Lending Policy / Operative Lending Limits and Principles (OLLP) defines the general principles of corporate lending, including segment- and product-specific guidelines, related financing conditions and operative lending limits. This policy provides a structured approach to financial risk assessment while ensuring consistent ESG risk integration across the Banking group's corporate lending activities.	This policy serves as a Banking group-wide lending standard, with banking subsidiaries required to integrate the ESG elements into their local lending policies. Exceptions: The Russian and Uzbek subsidiaries were not required to implement ESG provisions in 2025, but ESG-related guidance has been shared with them for voluntary adoption.	The Hungarian corporate lending policy is approved by OTP Bank's Board of Directors. The subsidiaries' lending policies are approved by their respective local decision-making bodies.	The application of the policy is required by Recommendation No. 7/2024. (VI.21.) of the Hungarian National Bank on the assumption, measurement, management and control of credit risk.
<i>Climate-related transition risks</i>	The corporate lending policy aims to set general corporate lending guidelines and risk appetite and to define a set of tools to enforce this, including ESG risk-related content. As part of this, lending guidelines for environmental and climate risks and guidelines for the assessment of financial risks based on these risks have been included in the policy. The lending policy also includes limits related to ESG risks. In this way, the policy is linked to the significant risks identified in the loan portfolio in the areas of climate change mitigation, climate change adaptation and energy.			
<i>Financing energy-intensive sectors</i>				
<i>Financing renewable energy or energy-efficient solutions</i>	The policy considers the interests of key stakeholders through the relevant departments involved in the policy development and review process, such as the Credit Risk Management Directorate, Risk Management Division, Retail Regulation and Mortgage Credit Risk Department and Corporate Credit Risk Management and Process Development Department. The policy is made available to affected stakeholders through direct contact and internal policy library.			

### 2.1.7.2 OTP Group's Green Loan Framework and Sustainable Finance Framework

OTP banking group has developed its green loan and sustainable finance frameworks in alignment with international best practices. These frameworks serve as the foundation for classifying and managing sustainable financial exposures across the Group's operations.

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Green Loan Framework</b>				
<p><i>GHG emissions in the portfolio</i></p> <p><i>Financing climate change mitigation activities</i></p> <p><i>Financing energy-intensive sectors</i></p> <p><i>Financing renewable energy or energy-efficient solutions</i></p>	<p>The Green Loan Framework defines the general principles of green lending. The framework covers sectors defined in both the EU Taxonomy and the Climate Bonds Initiative (CBI) Taxonomy:</p> <p>EU Taxonomy sectors: energy, manufacturing, transportation, construction and real estate, forestry, waste management</p> <p>CBI Taxonomy sectors: energy, industry, transportation, buildings, land use and marine resources, waste and pollution control</p> <p>Additionally, the framework allows for financing related to water management<sup>34</sup>. Its scope applies to non-retail customers, including multinational corporations, SMEs, municipalities, and residential housing associations. Loan eligibility is assessed using the Green Alignment Assessment Tool (GAAT), which incorporates country-specific conditions and documentation requirements. Where applicable, compliance with the EU Taxonomy includes verification of minimum safeguards.</p> <p>The Green Loan Framework, endorsed by external second-party opinion (SPO) providers, was updated and approved by the Hungarian National Bank in July 2023. This approval ensures that loans meeting the framework's criteria are eligible under Category B of the MNB's Green Corporate and Municipal Preferential Capital Requirement Programme, which defines the scope of eligible transactions.</p> <p>Corporate exposures are classified as green based on loan purpose and individual transaction assessments. These assessments are aligned with the EU Taxonomy and, where applicable, the MNB's Green Preferential Capital Requirement Programme. Taxonomy-aligned exposures are evaluated against the EU Taxonomy's Technical Screening Criteria (TSC).</p> <p>Retail exposures within the Group's green portfolio are similarly assessed based on loan purpose and compliance with one or more green criteria defined in frameworks aligned with the EU Taxonomy. The Group does not currently assess compliance with the Do No Significant Harm (DNSH) and Minimum Social Safeguards (MSS) criteria for retail exposures.</p>	<p>The Green Loan Framework has been extended beyond Hungary to banking subsidiaries in Bulgaria, Slovenia, Croatia, Serbia, Albania, and Montenegro. As part of the 2023 expansion, the framework was adapted to reflect the climate mitigation and adaptation priorities of each country, and to include loan purposes most relevant to OTP banking group's portfolio.</p>	<p>The Green Program Directorate is responsible for updating and supervising the framework.</p>	<p>The Framework includes reference to the following third-party standards: EU Taxonomy<sup>35</sup> CBI Taxonomy<sup>36</sup> MNB's Preferential capital requirements program for green corporate and municipal financing</p>

<sup>34</sup> Drought poses a significant physical climate change risk related to the crop production activities of agricultural clients. Investments aimed at mitigating this risk involve, either partially or entirely, water supplementation activities that affect the quantitative and qualitative state of surface and/or groundwater.

<sup>35</sup> Commission Delegated Regulation (EU) 2021/2139 and Commission Delegated Regulation (EU) 2023/2486

<sup>36</sup> <https://www.climatebonds.net/files/documents/supporting-documents/Climate-Bonds-Initiative-Taxonomy.pdf>

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Sustainable Finance Framework</b>				
<p><i>Financing climate change mitigation activities</i></p> <p><i>Financing energy-intensive sectors</i></p> <p><i>Financing renewable energy or energy-efficient solutions</i></p>	<p>The Banking group's sustainable funding activities are governed by the <a href="#">Sustainable Finance Framework</a>, which covers both environmental and social sustainability domains. This framework was updated in 2024 with validation from external experts (SPO) and is publicly available on OTP Group's website.</p> <p>Under this framework, OTP Bank and its subsidiaries may issue green and social financial instruments -including bonds - in accordance with the following standards:</p> <p>ICMA Green Bond Principles (2022)                      ICMA Social Bond Principles (2023)                      LMA Green Loan Principles (2023)                      LMA Social Loan Principles (2023)</p> <p>The framework explicitly excludes financing for fossil fuel production, nuclear energy, weapons and defence-related activities, mining, gambling, and tobacco-related activities. Eligible green categories include:</p> <p>Green buildings                      Renewable energy                      Clean transportation</p> <p>Eligible social categories include:</p> <p>Job creation and unemployment mitigation programs, particularly those addressing economic crises or social disruptions                      SME financing with demonstrable positive social impact</p> <p>OTP Group is committed to annual investor reporting within one year of issuing any sustainable financial instrument, continuing until full allocation of proceeds. The 2024 <a href="#">Allocation</a> and <a href="#">Impact</a> Reports are available on the Group's website. Reports for 2025 will be published in 2026.</p>	<p>This is a Banking group-wide framework, applicable to domestic and international banking subsidiaries issuing green and social financial instruments.</p>	<p>The Green Program Directorate is responsible for updating and supervising the framework.</p>	<p>The Framework includes reference to the following third-party standards:</p> <p>ICMA Green Bond Principles (2022)<sup>37</sup>                      ICMA Social Bond Principles (2023)<sup>38</sup>                      LMA Green Loan Principles (2023)<sup>39</sup>                      LMA Social Loan Principles (2023)<sup>40</sup>                      EU Taxonomy<sup>41</sup></p>
<b>OTP Mortgage Bank's Green Mortgage Bond Framework</b>				
<p><i>Financing climate change mitigation activities</i></p> <p><i>Financing energy-intensive sectors</i></p> <p><i>Financing renewable energy or energy-efficient solutions</i></p>	<p>The intention of OTP Mortgage Bank is to support international and domestic efforts of sustainable development. Thus, its strategic goal is to facilitate energy-efficiency improvements in the Hungarian real estate segment through green mortgage bond instruments.</p> <p>The objective of the Green Mortgage Bond Framework of OTP Mortgage Bank is to define the criteria set and evaluation of retail green loan instruments.</p> <p>In establishing the Green Mortgage Bond Framework, the Mortgage Bank has considered all recommendations that are included in the Green Bond Principles issued by the International Capital Market Association (June 2021 version).</p> <p>Use of Proceeds included in the Framework is as follows:</p> <ul style="list-style-type: none"> <li>• Energy-efficient properties</li> <li>• Buildings with significantly improving energy performance</li> </ul> <p>The Mortgage Bank's Green Strategy and Green Mortgage Bond Framework are intended to present the sustainability criteria clearly and transparently to its investors.</p> <p>OTP Mortgage Bank publishes annual allocation and impact report on its <a href="#">website</a> detailing the use of proceeds from green mortgage bond issuances. These disclosures ensure transparency and alignment with the Green Bond Principles and the Hungarian National Bank's Green Mortgage Loan Program, where applicable.</p> <p>The Framework effective in 2025 was released in 2021, however in January 2026 OTP Mortgage Bank issued its updated Green Mortgage Bond Framework, which is <a href="#">available here</a>.</p>	<p>The Framework applies to OTP Mortgage Bank.</p>	<p>The Green Mortgage Bond Framework of OTP Mortgage Bank was approved by the Company's Board of Directors.</p>	<p>The Framework includes reference to the following third-party standards:</p> <p>ICMA Green Bond Principles (2021)<sup>42</sup>                      ICMA Handbook Harmonized Framework for Impact Reporting<sup>43</sup>                      UN Sustainable Development Goals                      EU Taxonomy<sup>44</sup></p>

2.1.7.3 Climate change mitigation policies in asset management

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Principal Adverse Impact (PAI) Statements</b>				
<i>GHG emissions in the portfolio</i>	<p>Certain OTP Group asset management companies have adopted climate change mitigation policies as part of their Sustainable Finance Disclosure Regulation (SFDR)<sup>45</sup> disclosures. These commitments are outlined in the Principal Adverse Impact (PAI) Statement, which assesses the negative environmental impacts of investment portfolios. These policies also comprehensively address climate change. OTP Fund Management primarily aims to reduce greenhouse gas emissions, particularly the carbon footprint, and decrease energy consumption intensity in sectors with significant climate impact by carefully selecting new investments and, if necessary, phasing out existing investments. OTP Real Estate Fund Management strives to achieve and maintain a declining trend in indicators related to GHG emissions and energy use. DSK Asset Management has formulated the general goal of mitigating negative impacts.</p> <p>The policies are available to the public on the companies' websites as part of the PAI statements (<a href="#">@OTP Fund Management</a>, <a href="#">@OTP Real Estate Investment Fund Management</a>, <a href="#">@DSK Asset Management</a>).</p>	<p>OTP Asset Management, DSK Asset Management, and investment portfolio of OTP Real Estate Investment Fund Management.</p>	<p>The CEOs of the companies are responsible for the implementation of the policies.</p>	<p>The PAI statements are part of OTP Group's asset managing subsidiaries' SFDR disclosures.</p>
<i>Financing climate change mitigation activities</i>				
<i>Financing energy-intensive sectors</i>				
<i>Financing renewable energy or energy-efficient solutions</i>				
<i>Climate-related identified physical risks</i>				
<i>Climate-related transition risks</i>				

Additionally, OTP Group's Code of Ethics declares the corporate group's commitment to environmental sustainability and values (see [4.1.] Corporate Governance subchapter).

<sup>37</sup> <https://www.icmagroup.org/assets/documents/Sustainable-finance/2023-updates/Social-Bond-Principles-SBP-June-2023-220623.pdf>

<sup>38</sup> <https://www.icmagroup.org/assets/documents/Sustainable-finance/2022-updates/Green-Bond-Principles-June-2022-060623.pdf>

<sup>39</sup> [https://www.lma.eu.com/application/files/8916/9755/2443/Green\\_Loan\\_Principles\\_23\\_February\\_2023.pdf](https://www.lma.eu.com/application/files/8916/9755/2443/Green_Loan_Principles_23_February_2023.pdf)

<sup>40</sup> [https://www.lma.eu.com/application/files/8916/9755/2443/Green\\_Loan\\_Principles\\_23\\_February\\_2023.pdf](https://www.lma.eu.com/application/files/8916/9755/2443/Green_Loan_Principles_23_February_2023.pdf)

<sup>41</sup> Commission Delegated Regulation (EU) 2021/2139 and Commission Delegated Regulation (EU) 2023/2486

<sup>42</sup> <https://www.icmagroup.org/assets/documents/Sustainable-finance/2021-updates/Green-Bond-Principles-June-2021-100621.pdf>

<sup>43</sup> <https://www.icmagroup.org/assets/documents/Sustainable-finance/2021-updates/Handbook-Harmonised-Framework-for-Impact-Reporting-June-2021-100621.pdf>

<sup>44</sup> Regulation (EU) 2020/852 of the European Parliament and the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (<https://eur-lex.europa.eu/eli/reg/2020/852/oj>)

<sup>45</sup> Sustainable Finance Disclosure Regulation, Regulation (EU) 2019/2088

## 2.1.8 [E1-1] Transition plan for climate change mitigation

In 2025, the Banking group implemented a series of measures to support climate-change mitigation in its lending activities. While these measures include several elements required under the European Sustainability Reporting Standards (ESRS), they may not fully meet the criteria for formal recognition as an ESRS compliant transition plan with regard to the financed GHG emissions of the Bank, partially because of the following: while the ESRS implicitly assumes that a company mostly controls its GHG emissions, this is not the case for banks, as their financed GHG emissions (that cover the bulk of financial institutions total GHG emissions) depend on the behaviour of their borrowers, which financial institutions cannot control fully. Also, financed GHG emissions are based on data and quantification methodologies that have not reached a sufficient grade of reliability, yet.

OTP Bank will have a transition plan that fully complies with the requirements of ESRS (E1-1) with regard to its financed GHG emissions, too, when data on borrowers' GHG emissions will become more reliable (e.g. as they will rely on publicly reported, audited figures of borrowers to a sufficiently large extent, and they will cover physical activity-based emission indicators that are more reliable than estimation of GHG emissions based on financial indicators). Notwithstanding the before mentioned, efforts of OTP Group to reduce its own GHG emissions and to set targets for reduction of its financed GHG emissions (while the Group cannot ensure the completion of those targets as it does not control some of its key variables such as borrowers' GHG emissions) as described in this Report are in line with the overall requirements of the CSRD and the Hungarian Act C of 2000 on Accounting.

The Banking group has established interim targets to reduce GHG emission intensity of its credit portfolios. Details on these targets, including methodologies, scope, and data sources, are provided in [E1-4] subchapter.

The measures the Banking group implemented to contribute to the mitigation of climate change are the following:

### 2.1.8.1 Green Lending Targets

The Banking group considers financing the green transition as the main contribution factor banks can make to contribute to climate-change mitigation, therefore the Banking group has established measurable targets for green lending volumes, which are integrated into its core business strategy. The definition of green loans is internally set, and progress toward the targets is regularly monitored. Achievement of green-lending goals is linked to management remuneration, reinforcing accountability. The Banking group completed its previous green lending target set for 2025, and it has set a new target for its outstanding green volume of EUR 5.4 billion for 2028. Banking group's green portfolio and the definitions applied are disclosed in subchapter [E1-3], while green lending targets are presented in detail in subchapter [E1-4].

### 2.1.8.2 Client Climate Engagement Assessment (CCEA)

For clients in high-emission sectors (electricity, cement, steel and aluminium production) with large (actual or requested) loan volumes, OTP Bank introduced a new structured assessment of their climate mitigation commitments. If a client's efforts are deemed insufficient, the case receives elevated scrutiny. The mechanism is detailed in subchapter [E1-3].

### 2.1.8.3 Limits and Restrictions

The Banking group defines specific activity types that are either excluded from financing or subject to conditional financing. These limitations are partially disclosed publicly and partially maintained internally. Disclosure about limits and restrictions is presented in subchapter [E1-3].

### 2.1.8.4 Financed Emissions and Reduction Targets

OTP calculates financed greenhouse gas (GHG) emissions for its lending portfolio in accordance with legal requirements. Reduction targets for 2030 are aligned with the IEA Net Zero Emissions by 2050 scenario. The Group identified a list of potential measures to steer toward these targets, while it maintains transparency about the bank's capabilities and limitations to meet those targets. The Group's Scope 3 emission targets are presented in detail in subchapter [E1-4].

## 2.1.9 [E1-3] Actions and resources in relation to climate change policies in the financed portfolio

E1 – Climate change				
Material sustainability matters	Identified IRO	Financial group-level targets	Financial group-level actions	
Downstream - Financial services				
Climate change adaptation	R	<i>Climate-related identified physical risks</i>	No available target	Credit risk management Collateral management Credit rating Integration of ESG factors in Country and Counterparty risks
	(-) I	<i>GHG emissions in the portfolio</i>	The Banking group's relative reduction target for financed Scope 1–2 emissions (excluding sovereign exposures) is 29.8% by 2030 compared to the 2023 baseline.	Limits and restrictions Green lending
Climate change mitigation	O	<i>Financing climate change mitigation activities</i>	The green lending targets of the Banking group are HUF 1,500 billion by 2025 and HUF 2,123 billion by 2028.	Green lending
	R	<i>Climate-related transition risks</i>	No available target	Client Climate Engagement Assessment Limits and restrictions Credit risk management Collateral management Credit rating Integration of ESG factors in Country and Counterparty risks
Energy	(-) I	<i>Financing energy-intensive sectors</i>	No available target	Limits and restrictions
	O	<i>Financing renewable energy or energy-efficient solutions</i>	No available target	Green lending
	R	<i>Financing energy-intensive sectors (transition risk)</i>	No available target	Limits and restrictions Credit risk management Credit rating Integration of ESG factors in Country and Counterparty risks

The Banking group implements various actions to manage impacts, risks and opportunities arising from climate change. These include:

- Green lending targets (presented in the subchapter [E1-3] voluntary green portfolio report and in subchapter [E1-4])
- Client Climate Engagement Assessment
- Limits and restrictions
- Integration of ESG risks into financial risk management procedure
- Financed emissions reduction measures and targets (presented in subchapter [E1-4])

The implementation of the actions does not require significant operational expenditures or capital expenditures as those are embedded in business-as-usual processes.

### 2.1.9.1 Voluntary green portfolio report

OTP Group is committed to ensuring transparency in presenting its sustainability efforts. In line with this commitment the Banking group prepared a voluntary green portfolio report beyond the disclosure of the mandatory green asset ratio of the Taxonomy Regulation (presented in chapter 2.3 EU Taxonomy). In this subchapter the composition, the applied calculation methodology and the underlying definitions of the voluntary green portfolio defined by the Banking group are detailed with the relevant ratios following other market and regulatory standards beyond the Taxonomy Regulation.

One of the key objectives of OTP Group's ESG strategy is the continuous expansion of its green portfolio. The Banking group actively finances the region's green transition and has introduced a green asset KPI at subsidiary level in line with local ESG strategies to monitor and promote this goal. By the end of 2025, the green portfolio reached HUF 1,697 billion, marking a 43% increase compared to the previous year's green portfolio.

Further detailing of objectives continued, and OTP Bank Management Committee approved specific targets for 2025, segmented into retail and corporate categories. The Banking group has committed to achieving HUF 1,500 billion in green loan portfolio volume by 2025 through dynamic expansion across all key customer segments. The planned target was achieved at a level 13% above expectations.

The corporate green portfolio grew by 35% compared to the previous year, with sustainable corporate assets representing over 62% of the total sustainable portfolio. The proportion of sustainable exposures relative to gross book value is above 10% reflecting an improvement of more than 2.5% from the previous year.

The corporate green bond portfolio decreased by just under 5 % compared to the previous year, resulting in a change in the consolidated gross book value ratio from 15% to 12%, while its share within the sustainable portfolio amounts nearly 3%.

The green share of the retail portfolio increased by 67% compared to the previous year, driven partly by a significant improvement in data quality and partly by the inclusion of the retail green loan portfolios of foreign subsidiary banks in the reporting, as well as by the impact of the expanded retail green definition applied in 2025.

The revised green definition complies with professional and market standards and expectations, while taking into account the specific characteristics of local markets. The current definition is approved by the ESG Committee. A detailed explanation is provided in the following subchapter.

The Banking group has green loan portfolios in nine countries: Hungary, Bulgaria, Slovenia, Croatia, Serbia, Uzbekistan, Montenegro, Albania, and Moldova. Progress in green financing remains strong across all targeted markets.

The expected impact of green lending on reducing GHG emissions is presented in [E1-4] subchapter.

#### *The Banking group's green portfolio*

The Banking group's sustainable financing frameworks are defined by the Green Loan Framework, the Sustainable Finance Framework, the MNB's Green Housing Preferential Capital Requirement Programme, OTP Mortgage Bank Green Mortgage Bond Framework as well as MNB's Preferential capital requirements program for green corporate and municipal financing, and the EU Taxonomy. The Banking group considers exposures that meet the criteria defined in these frameworks as green exposures, records them as green loans in its internal databases, and sets quantitative targets for these exposures. The observed increase in the Bank's portfolio reflects, among other factors, the strengthened data infrastructure and the systematic refinement of the framework, both of which have contributed to greater operational efficiency and strategic alignment. In case the green definition changes in the future, the Group could restate comparative values, supplemented by the indication of values based on previous methodology, which was applied for the financial year of 2025. Hereinafter, we refer to this as the Banking group's green portfolio.

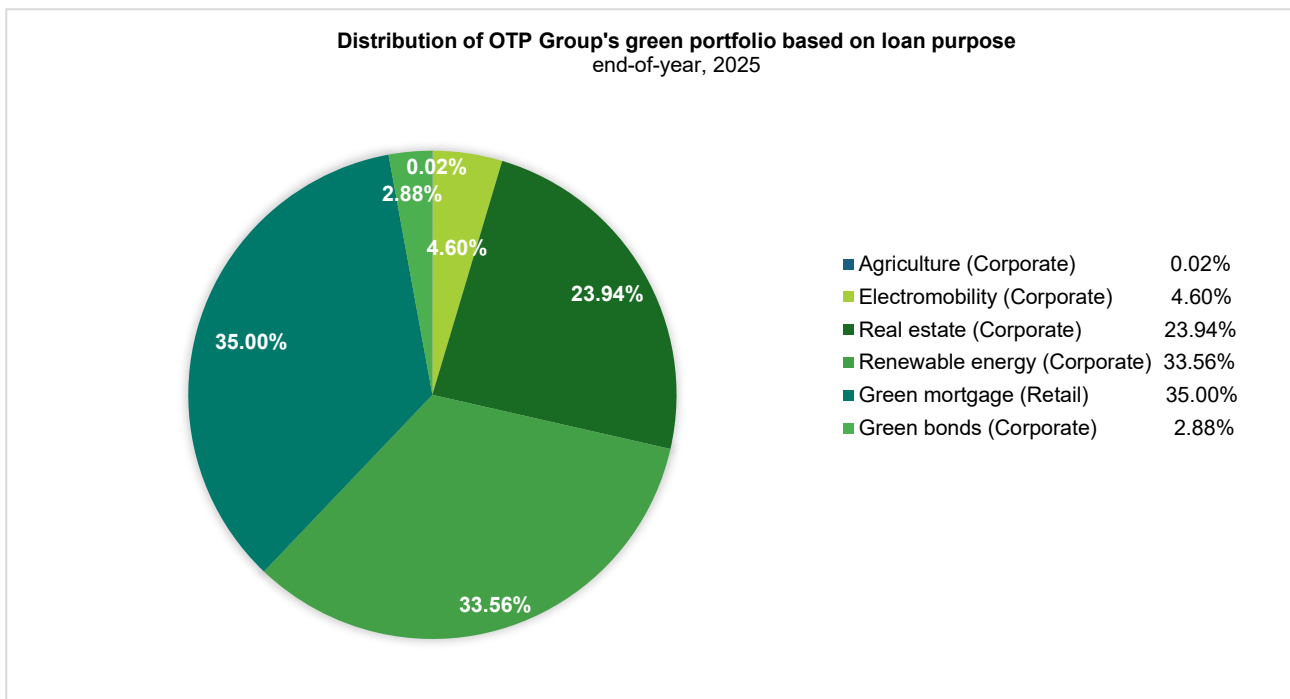
To demonstrate the correlation with the mandatory GAR report figures, the table below presents the OTP banking group's green portfolio as proportion of the total balance sheet total and the EU Taxonomy GAR asset total data defined in the mandatory report under the Taxonomy Regulation.

The table includes the exposures identified by the Banking group that meet the sustainable criteria detailed below and are recorded as green. The figures include green loan and bond exposures of enterprises outside the EU, as well as exposures of clients not subject to the NFRD/CSRD during the reporting period, i.e., those that cannot be included in the mandatory GAR report.

Green Portfolio as defined by OTP banking group, 2025					
	Gross book value*	Green portfolio	Green portfolio as a proportion of gross exposure by customer segment	Green portfolio as a proportion of Total assets	Green portfolio as a proportion of Total GAR assets
	HUF million	HUF million	%	%	%
Total assets	<b>46,720,161</b>				
Total GAR assets	<b>31,384,250</b>				
<b>Non-financial corporations</b>	10,653,036	1,103,194	10.36%	2.36%	3.52%
Loans and advances	10,249,732	1,054,367	10.29%	2.26%	3.36%
Debt securities	399,372	48,827	12.23%	0.10%	0.16%
Other	3,932				0.00%
<b>Households</b>	15,862,934	594,109	3.75%	1.27%	1.89%
<b>Green portfolio of OTP Group**</b>		<b>1,697,303</b>		<b>3.63%</b>	<b>5.41%</b>

\* According to Gross Book Value of EU Taxonomy

\*\* As defined in 2.3



This allocation demonstrates the portfolio's diversification and balance across various green investment areas. Renewable energy and corporate real estate projects represent a significant portion of the green portfolio, with electromobility and residential mortgage loans also significant. Although agriculture and corporate green bonds account for smaller portions, they contribute to the portfolio's year-over-year growth.

#### *Green Lending Criteria and Definitions Applied in the Voluntary Green Portfolio*

The Banking group has developed its green loan and sustainable finance frameworks by taking into account international best practices as they are presented in [E1-2] subchapter. The green definition is presented and explained in greater detail in the reporting policy regarding chapter E.

#### *Corporate Green Lending*

In 2025, the Banking group significantly expanded its green loan and bond portfolio, in line with its ESG strategy. The combined corporate green loan and bond portfolio grew from HUF 834 billion to HUF 1,103 billion, strengthening OTP Group's role in financing a fair and gradual transition to a low-carbon economy.

Within the green portfolio, the corporate loan portfolio - primarily comprising large corporate and project finance loans - continued to expand in 2025. This growth was driven by financing projects in renewable energy sources and sustainable real estate development. Additionally, financing for energy production from sustainable fuel sources (e.g. biomass and biogas power plants) increased.

In 2025, the Bank's green SME loans portfolio continued to expand in terms of number, with its total volume exceeding HUF 117 billion.

In Hungary, Széchenyi Investment Loan Max+ was carried on, a state-supported green investment loan for micro, small, and medium-sized enterprises (SMEs). Within the framework of this program, a special green variant, option D, continued to offer preferential interest rates for green investments that align with the Banking group's definitions of green financing, based on the KAVOSZ<sup>46</sup> criteria

In 2025, subsidiaries built on the strong momentum of the previous year, maintaining a sharp focus on renewable energy financing, electric vehicle financing and real estate investments. The structure of renewable energy investments continued to differ across countries, shaped by geographic and regulatory factors, which influenced the mix of solar, wind, and hydropower projects.

In real estate financing, meeting the conditions defined in the EU Taxonomy based on primary energy demand calculations poses a significant challenge. At the member state level, the regulatory environment related to energy-efficient buildings and the availability of official documents (energy certificates) vary, which greatly complicates the provision of EU Taxonomy-based green loans in the real estate sector.

The implementation of these measures does not require significant expenditures as they are part of the regular operations.

### *Retail Green Lending*

The retail green loan portfolio includes the aggregated retail green loan exposures of domestic banking entities and foreign Group subsidiaries. The consolidated portfolio data are reported in monthly controlling report. KPIs are established during the annual planning process, aligned with the ESG strategies of the subsidiary banks and the group-level ESG guidelines. The definition of the green retail portfolio was refined in 2025 following the approval of the ESG Committee. Detailed definition can be found in Chapter 1.3.

The green loan portfolio for retail customers reached HUF 594 billion by the end of 2025.<sup>47</sup>

In Hungary, the volume disbursed under the two green products launched in 2023, together with the OTP Green Home Loan for Young People introduced in 2025, amounted to nearly HUF 48 billion in 2025: In addition, based on official energy certificates, the value of the residential portfolio in Hungary classified as green under OTP Bank's official definition amounted to HUF 321 billion in 2025.

The Hungarian Green Home Program (ZOP) loans, available in 2021-2022, still represent a significant share of the retail green portfolio. This portfolio amounts to nearly HUF144 billion and is primarily used for energy-efficient new home purchases and construction.

In Croatia, OTP Group's subsidiary bank recorded strong growth in its green home loan portfolio in 2025, reaching HUF 52 billion by year-end. The Sunny Loan product, offered in this market, supports both new home construction and purchases, as well as renovations of existing homes, provided they meet defined energy efficiency criteria.

OTP Bank Slovenia provides sustainable loan products for households, including financing for green mobility and energy efficiency improvements. Housing loans with preferential interest rates are available for the purchase of energy-efficient real estate. Further details on these products are published on the bank's website. The Slovenian retail mortgage portfolio was incorporated into the bank's controlling statement in 2025 in accordance with the group's green definitions. The size of the reported portfolio exceeded HUF15 billion.

<sup>46</sup> KAVOSZ coordinates the state-subsidized loan.

<sup>47</sup> The amount shows the current exposure of green product structures disbursed in Hungary and certain subsidiaries, a portion of which is accounted for in the MNB's green capital requirement discount program for housing purposes.

In 2025, the Serbian subsidiary bank initiated the integration of its retail green portfolio into the group-level green portfolio. Green exposures within the subsidiary's portfolio were identified based on the required EPC certificates and in accordance with the recommendations of the local national bank. The size of the retail green portfolio reached HUF 13.5 billion by the end of the year.

In response to the damage inflicted on Ukrainian energy infrastructure, OTP Bank Ukraine has introduced a dedicated financing program under the OTP Energy Program. This initiative provides loans for energy-independent solutions, including the installation of solar power plants, to enhance resilience and ensure continuity of energy supply for clients.

To ensure data comparability, the banking group reports the following figures for the previous year. These figures were recalculated based on the restatement of the retail green definition and improvements in data clarity and accessibility, in accordance with the reporting policy related to Chapter E, as detailed therein. Accordingly, the 2024 portfolio data were adjusted to include items that qualify as green under the retail green definition applied in 2025, in order to ensure time-series comparability.

Green Portfolio as defined by OTP banking group, 2024					
	Gross book value*	Green portfolio	Green portfolio as a proportion of gross exposure by customer segment	Green portfolio as a proportion of Total assets	Green portfolio as a proportion of Total GAR assets
	HUF million	HUF million	%	%	%
<b>Total assets</b>	<b>44,852,131</b>				
<b>Total GAR assets</b>	<b>29,047,630</b>				
<b>Non-financial corporations</b>	10,597,072	833,809	7.87%	1.86%	2.87%
Loans and advances	10,187,983	782,721	7.68%	1.75%	2.69%
Debt securities	339,126	51,088	15.06%	0.11%	0.18%
Other	69,964				0.00%
<b>Households</b>	13,692,065	355,822***	2.60%***	0.79%***	1.22%***
Households (based on 2024 definition)	13,692,065	193,634	1.41%	0.43%	0.67%
<b>Green portfolio of OTP Group**</b>		<b>1,189,631</b>		<b>2.65%</b>	<b>4.10%</b>
Green portfolio of OTP Group** (based on 2024 definition)		1,027,443		2.29%	3.54%

\* According to Gross Book Value of EU Taxonomy

\*\* As defined in 2.3

\*\*\* Restatement based on the revised retail green definition introduced in 2025

### 2.1.9.2 Client Climate Engagement Assessment

For clients in high-emission sectors (electricity, cement, steel and aluminium production) with large (actual or requested) loan volumes, OTP Bank introduced a new structured assessment of their climate mitigation commitments which is applied from 2026 and will be extended later to other banking subsidiaries. This assessment considers industry trends and GHG emission metrics, compares the borrower's production technology to industry averages and its GHG emissions to industry benchmarks and it also takes into account whether green(er) alternative technologies are available for the client. The assessment process requires a direct engagement with the client and is repeated annually. This evaluation process is integrated into both lending and ongoing monitoring workflows and involves direct engagement with the client where it is justified and possible.

If a client's climate-related efforts – considering its deviations from industry averages, geographical characteristics and the availability of green(er) technological alternatives – are assessed as insufficient, the exposure is subject to enhanced scrutiny.

### 2.1.9.3 Limits and restrictions

The Banking group defines specific activity types that are either excluded from financing or subject to conditional financing criteria. These restrictions are based on environmental, social, and governance considerations and reflect the Banking group's commitment to responsible lending practices.

The list of restricted and conditionally financed activities is disclosed in part through public documentation, while additional criteria are maintained internally for operational and risk management purposes. Detailed information is presented in [E1-3] Credit risk subchapter.

#### 2.1.9.4 ESG risk management function and integration of ESG risks into financial risk management procedure

The Banking group has incorporated ESG risks into its risk management guidelines and procedures, enabling the identification and management of these risks to minimize – among others – emerging credit, reputational, regulatory, and legal risks. ESG risk management within the Banking group is integrated into various levels of the risk ecosystem: OTP Group Risk Strategy, OTP Group Risk Appetite Statement, the risk management frameworks for different risk types, and the Operative Lending Limits and Principles (OLLP). OTP applies a gradual approach to ESG-related risk limits, and the Risk Appetite Statement and Banking group-level OLLP already include such restrictions.

For the 2026-2028 period, the Banking group is preparing its Risk Strategy, which includes ESG-related objectives both at OTP Bank and across its subsidiary banks. The aim is to support the deeper and continuous integration of climate-related ESG risk factors and to strengthen ESG risk awareness. The strategy is designed to ensure active contribution from both the parent Bank and its banking subsidiaries, taking into account local specificities and changes in regulatory requirements. A key objective is for each participating entity to regard its own ESG goals as a matter of committed ownership.

ESG data quality remains a key concern. To continue deploying ESG data-driven models, a key short-term development priority is establishing a central ESG data platform, integrating client data points, emission factors, and other external ESG data.

In course of the ESG risk management the most important areas are the credit risk management, collateral valuation, credit rating (these are included in the next subsections) and stress testing (this is detailed in [SBM-3] Stress test subchapter).

##### 2.1.9.4.1 Credit risk

###### *Corporate Credit Risk Management*

To manage the credit risk aspect of ESG risks, OTP Group's banking and leasing subsidiaries have applied their ESG risk-management framework in corporate lending since 2021. The main elements of the framework are the following:

ESG exclusion list: defines activities in which OTP does not participate directly due to their controversial nature and impact.

Sectoral ESG risk heatmap: includes the ESG risk categorization of each economic activity in NACE classification, considering the environmental and social impact of the respective industry.

ESG risk assessment: includes the determination of ESG risk categories at client and transaction levels, including client due diligence in predefined cases. OTP applies a different method for leasing transactions where the financed asset is motorized; in these cases, the ESG risk category is determined based on the estimated environmental impact of the asset's engine (considering European vehicle-emission standards). ESG aspects are considered in individual corporate lending decisions. The methods are continuously developed in line with the expansion of available data and methodologies.

In corporate lending – as for the Hungarian operations – the Hungarian National Bank prescribes the application of a specific set of examination criteria and a minimum ESG questionnaire for client due diligence related to environmental and climate risk assessment, starting from 2025 with a phased implementation. In relation to the ESG due diligence, the Hungarian National Bank published its thematic recommendation initially in September 2024 under reference number 9/2024 (IX.24)<sup>48</sup>, followed by an updated set of application conditions defined in recommendation 7/2025 (VI.23)<sup>49</sup> in June 2025. In line with the expectations set out in the recommendation, as of January 1, 2025, the Bank implemented the examination criteria applicable in the course of ESG risk assessment for loan applications exceeding EUR 1 million submitted by foreign companies without a registered office or branch in Hungary. Furthermore, from 1 July 2025, the Bank introduced the MNB ESG questionnaire in accordance with the conditions specified in the recommendation i.e. for domestic clients whose loan applications exceed HUF 500 million. OTP Bank has joined the initiative of the Hungarian Banking Association aiming to establish a common digital platform. The platform would serve for handling corporate clients' ESG due diligence questionnaires (required by MNB's respective recommendation).

In the Corporate Lending Policy / Operative Lending Limits and Principles (OLLP) – with the exception of the Uzbek and Russian subsidiary banks – lending guidelines have been formulated from an environmental and climate risk perspective, as well as financial risk assessment guidelines based on environmental risks have been formulated. As part of the policy, financing guidelines and assessment frameworks related to renewable energy production, a key element of green lending, are also included.

In 2025, OTP Bank significantly restricted its lending activities related to thermal coal (i.e., coal used for power generation). This commitment was made publicly available on the [Bank's website](#).

From 1 July 2025 OTP Bank undertakes to apply restrictions on new loan financing for capital expenditures related to new capacity for thermal coal, i.e. mining and processing of thermal coal as well as coal-based electricity generation. Final maturity date of any potential new transactions (investment loans, project finance loans) financing new thermal coal capacities, including refinancing, cannot exceed 31 December 2030 while their availability period cannot exceed 31 December 2026.

OTP Bank is committed to supporting the transition to a sustainable, low-carbon economy in line with the Paris Climate Agreement, therefore investments in renewable energy and investments aiming at the reduction of the negative environmental impacts of existing thermal coal assets (green / transition financing, technological improvement etc.) are supported for financing.

In addition, OTP maintains an internal, non-public lending policy concerning the financing of coal mining and coal-based energy production activities.

Regarding credit risk, the Group also applies limits related to the corporate ESG risk management in banking and leasing subsidiaries. A banking and leasing subsidiary-level limit is applied to the ESG exclusion list. In addition, in 2023, a new quantitative limit was introduced within the Hungarian operation and in certain banking subsidiaries to restrict the share of new transactions with high ESG risk category within new risk-taking. The range of applied limits is expanding gradually. In, 2025 a specific composite limit for certain manufacturing sectors with high GHG emission has been defined, while from 2026 a new limit will be introduced in the Hungarian operation related to electricity generation. The limits are defined in the Risk Appetite Statement or in the OLLP. Currently, they are not publicly disclosed. Compliance with the limits is regularly monitored on a quarterly basis. The overall corporate ESG credit risk management methodology is continuously developed, with plans to introduce additional risk limits and apply ESG-specific lending guidelines.

Since 2023, monthly internal reports on banking and leasing subsidiary-level ESG credit-risk exposure are prepared for the corporate loan portfolio for the Credit and Limit Committee, and quarterly for the Board of Directors.

#### 2.1.9.4.2 Collateral management

Given OTP Mortgage Bank's substantial exposure to real estate, an ESG assessment methodology has been applied within the Hungarian operations since February 2023, ensuring that ESG-relevant evaluation is appropriately integrated into the collateralized commercial real estate portfolio.

ESG data fields have been integrated into the Bank's corporate loan registry system. These fields are partially populated through an automated process, drawing on data from the system of OTP Mortgage Bank.

<sup>48</sup> Recommendation No 9/2024 (IX.24.) of the Hungarian National Bank on the use of a minimum set of questions to assess environmental, social and governance information in the underwriting, measurement, management and control of credit risk

<sup>49</sup> Recommendation No 7/2025 (VI.23.) of the Hungarian National Bank on the use of a minimum set of questions to assess environmental, social and governance information in the underwriting, measurement, management and control of credit risk

The ESG collateral valuation methodology of OTP Bank is shared with subsidiary banks and leasing companies. For vehicle-related collateral, subsidiaries implement ESG methodologies according to predefined timelines. Merkantil Bank has developed its own ESG methodology for leasing assets, outlined in the appendix of the current Group Credit Risk Policy. The methodologies described below reflect OTP Bank's current practices and they are shared with banking subsidiaries to achieve consistent data provision across the Group.

#### Immovable property

During the valuation of real estate collateral, OTP Mortgage Bank systematically records the location, technical specifications, and energy characteristics of both commercial and residential properties in its internal systems. As part of continuous developments, ESG-specific data fields have been implemented into the collateral registry system for the corporate segment.

During the real estate collateral valuation process certain kind of physical risk elements are evaluated, such as drought, flood and heatwave. Determining "*Sustainability Rating*" has become an integrated part of the full valuation process of commercial real estate collaterals.

According to ESG related indicators ("*Sustainability Rating*", "*Physical risk*", "*Transitional risk*", "*Energy Performance Certificate*"), immovable collaterals are classified into the following 4 categories as ESG1/ ESG2/ ESG3/ or ESG4 and the result of the grade is displayed in the corporate collateral registry system.

The methodology was transferred to the banking and leasing subsidiaries of OTP Group as part of the Group Credit Risk Policy (GCRP). ESG-specific data fields have been created in the corporate collateral registration system.

In the retail segment, residential properties pledged as collateral are classified into the following predefined risk categories based on their energy certificate rating or estimated energy efficiency.

#### Movable Property

OTP Bank has implemented an IT-supported framework for identifying ESG risks associated with movable collateral, specifically vehicles. This framework enables the automated classification of vehicle-type collateral into four ESG categories (ESG1–ESG4), based on asset characteristics and portfolio exposure. The classification results are integrated into the corporate collateral registry system.

To facilitate ESG data collection, an "ESG Card" has been introduced within the registry system. This feature stores environmentally relevant information and distinguishes between two asset types:

- Vehicle-type movable collateral, including passenger cars, SUVs, trucks, buses, caravans, mopeds, motorcycles, agricultural machinery and tractors, boats, airplanes, trolleybuses, trams, trailers and semi-trailers, and other vehicle types.
- Other movable collateral, currently limited to solar power plant technology.

Vehicle-type ESG classification is performed automatically, primarily based on EURO emission standards and other relevant asset attributes. The methodology and guidelines supporting this framework are continuously shared with OTP Group subsidiaries to ensure consistent ESG risk evaluation across the organization.

#### 2.1.9.4.3 Credit rating

In alignment with regulatory expectations, OTP Bank has initiated the development of risk modelling procedures addressing climate change and environmental risks, with the objective of integrating these into existing lending processes. As part of this effort, the Bank has established a foundational database based on geospatial data. This database enables the analysis of relationships between the financial characteristics of financed companies and climate risk indicators.

To support this modelling, the Bank identified acute and chronic physical risks with significant relevance to Hungary. Following a review of the data content and accessibility of various online sources, the core data for the ESG physical risk database were acquired and processed. The mapping of additional material ESG risk factors - both acute and chronic - is ongoing and will be expanded at the Banking group level.

The Bank considers the application of ESG factors most appropriate within the Probability of Default (PD) modelling framework. Environmental risks are the most relevant in impact and financial materiality in the lending portfolio, particularly in relation to:

- Collateral exposure to physical hazards, such as property damage from extreme weather events, and water scarcity or drought affecting agricultural assets.
- Transition-related investment risks, including potential capital expenditures required to meet decarbonisation or regulatory targets.

This approach reflects OTP Bank's commitment to embedding climate and environmental considerations into its core risk assessment and lending methodologies.

OTP Bank also applies ESG factors in modelling Loss Given Default (LGD), which is presented in detail as part of the IFRS 9 financial disclosure (there is an LGD overlay in the IFRS 9 impairment).

#### Credit Rating System

Assessing physical climate risks presents significant technical challenges, particularly the need for granular geographical data to evaluate the severity of weather-related hazards across different locations. In response to regulatory expectations, OTP Bank developed climate and environmental risk modelling procedures, with the aim of integrating these into its credit approval process. The methodology has been implemented at OTP Bank and is being progressively extended to other entities within the Banking group. As of 2025, the hazard maps for each OTP country have been prepared for the identified physical risk elements.

The ESG module developed for risk assessment has been integrated into the customer rating system. Furthermore, based on the physical risk module and the energy efficiency of residential collateral, ESG considerations have been introduced into the mortgage loan assessment process.

To determine physical risk exposure, the Bank employs a simplified climate risk heat mapping methodology. This approach enables efficient portfolio-level risk mapping by sector, sub-sector, and geographical area. The physical risk assessment is based on the following functional relationship:

Risk = f (Vulnerability [V], Hazard [H], Insurance [I]):

- Vulnerability is sector-specific and determined using NACE codes. To each sector a vulnerability score for each identified physical risk is assigned, with five possible levels: *very low, low, medium, high, and very high*.
- Hazard is location-specific and reflects the relative importance of each climate risk at a given site. Scores range from very high (1) to low (4).
- The customer's location is determined using the address of the collateral, company site, or headquarters.

The following physical risk indicators are currently used:

1. **Drought Index:** Hungary has experienced severe droughts in recent years, notably a catastrophic 7-week dry period in mid-2022 that devastated agricultural yields in Eastern Hungary. Agriculture is highly vulnerable to drought. OTP Bank uses a modified version of the Palfai Drought Index (PAI), a Hungarian tool developed for agricultural and water management applications, to quantify drought risk.
2. **Flood Index:** In accordance with Directive 2007/60/EC (Floods Directive), Hungary identifies flood-prone areas based on three categories:
  - Flooding along unembanked watercourses
  - Flooding due to embankment failure or insufficient capacity
  - Flooding caused by precipitation and rising groundwater levels
 Data sources include the Hungarian government's revised river basin management plan (VGT3, April 2022), which provides preliminary vulnerability and risk maps.
3. **Storm Index:** A storm is defined as a weather event with wind speeds exceeding 20 m/s. The storm risk index measures the number of days per year when wind gusts reach or exceed this threshold.

4. **Frost Index:** Frost is categorized into spring, autumn, and winter types:

- Spring frost: Temperatures  $\leq -2^{\circ}\text{C}$  during the spring period
- Autumn frost: Temperatures  $\leq -2^{\circ}\text{C}$  during the autumn period
- Winter frost: Temperatures  $\leq -15^{\circ}\text{C}$  during the winter period

The frost risk index indicates the number of days annually when minimum temperatures fall below  $-2^{\circ}\text{C}$  at two meters above ground level. Late spring frosts pose significant risks to agriculture and forestry.

5. **Heat Stress Index:** Heat-related excess mortality observed in historical data, based on meteorological service records (both historical and forecast datasets), population distribution data, and mortality statistics.

#### 2.1.9.4.4 Integration of ESG factors in Country and Counterparty risks

Country and Counterparty Management Teams systematically embed sustainability considerations into their risk management framework which is relevant for OTP Bank and banking subsidiaries. On the counterparty side, ESG ratings are integrated into the internal rating calculation process. The primary source is the S&P Capital IQ ESG score, derived from the industry-specific Corporate Sustainability Assessment, which aggregates Environmental, Social, and Governance dimensions on a weighted basis into a 0-100 scale. Scores above 70 are considered a positive qualitative adjustment within the internal rating methodology, complemented by MSCI and Refinitiv assessments where available.

Regarding country risks, ESG considerations are embedded within the sovereign risk framework to ensure a holistic view of sustainability and governance. The model integrates indicators capturing ESG quality. Key governance-related factors include institutional strength, democratic stability, rule of law, and global peace indices, which directly influence rating outcomes. This approach ensures that sustainability risks and governance standards are systematically reflected in sovereign credit assessments, supporting transparency and long-term risk management.

Both dimensions are subject to integrated quarterly monitoring and annual limit review. The monitoring process includes systematic updates of internal rating sheets, ESG-related event tracking, and comprehensive risk reporting.

The objective of ESG integration is to ensure that risk decisions reflect not only financial resilience but also measurable, auditable, and transparent sustainability performance.

#### 2.1.9.4.5 Managing market risks

OTP Bank incorporates sustainability risks into market risk management in accordance with the Hungarian National Bank's Green Recommendations. ESG considerations are embedded in both trading and discretionary portfolio management through the application of ESG rating-based position limits. For discretionary portfolios, the Bank also applies an ESG exclusion list to restrict exposure to specific sectors or issuers.

Starting from Q1 2023, principal adverse impacts (PAI) have been considered in discretionary portfolio management using standardized PAI statements provided by MSCI. These reports cover all identified indicators, with the exception of fossil fuels and energy-efficiency, due to current data limitations. Portfolio coverage under the PAI framework shows a positive trend, although no explicit limits or formal policy have yet been established for PAI observation.

To monitor ESG-related risks, weekly stress tests are conducted on corporate bond portfolios held in both the trading and banking books covering the Banking group. These tests assess the sensitivity of the portfolios to ESG risk factors, contributing to the Bank's broader market risk oversight and sustainability risk management framework.

#### 2.1.9.4.6 Liquidity risks

Recognizing the growing relevance of sustainability factors, OTP Bank's Integrated Risk Management function has initiated the development of a methodology to assess liquidity risks arising from ESG-related exposures. This integration effort aims to enhance the Bank's ability to identify and manage potential liquidity impacts linked to environmental, social, and governance risks, in line with evolving regulatory expectations and best practices.

#### 2.1.9.4.7 ICT risks

Within the information and communication technology (ICT) risk domain, particularly in relation to Business Continuity Management, business units completing the business impact analysis can indicate ESG relevance, primarily the Environmental (E) factor. Accordingly, ESG considerations are incorporated into the preparation of business continuity plans at OTP Bank. Furthermore, the DORA regulation's risk assessment process for ICT third parties has been enhanced to include ESG considerations as well.

#### 2.1.9.4.8 ESG risk management at OTP Fund Management

OTP Fund Management integrates sustainability risks into investment decision-making in alignment with the SFDR (EU 2019/2088). ESG risks are assessed within a comprehensive framework covering:

- Environmental (E): GHG emissions, carbon footprint, energy use, waste management, water usage.
- Social (S): Labor standards, human rights, social accountability.
- Governance (G): Corporate governance structures, ethical conduct, tax compliance.

Investments are excluded based on activities with significant adverse sustainability impacts, including tobacco, alcohol, gambling, coal mining, controversial weapons, and sovereign bonds from authoritarian regimes. Exclusions are informed by Bloomberg, MSCI ESG Manager, and MSCI BarraOne data.

ESG ratings are sourced from MSCI ESG Research, ranging from CCC (worst) to AAA (best), and reviewed quarterly.

OTP applies selected Principal Adverse Impact (PAI) indicators to measure sustainability impacts, including Scope 1, 2 and 3 emissions, non-renewable energy use, unrecycled waste, absence of workplace safety policies, and lack of carbon reduction initiatives. Portfolio-level coverage typically reaches 65%, with weighted averages used for aggregation.

#### *SFDR Classification*

SFDR Article 8 funds must have at least 75% ESG-compliant assets (A–AAA rating), which are further divided by OTP Fund Management into:

Strong ESG-Focus Funds:

- Weighted ESG rating between A and AAA.
- At least 75% of assets rated AAA–BBB (developed markets) or AAA–BB (emerging markets).
- No assets rated CCC.
- Not more than 10% of assets without ESG rating (unrated ISINs).
- In fund-of-funds structures, at least 75% exposure to SFDR Article 8 or 9 funds, otherwise to underlying funds rated AAA–BBB (developed) or AAA–BB (emerging) if SFDR classification is unavailable.

Standard ESG Funds:

- Weighted ESG rating between BBB and AAA.
- At least 51% of assets rated AAA–BBB (developed markets) or AAA–BB (emerging markets).
- No assets rated CCC.
- Not more than 10% of assets without ESG rating.
- In fund-of-funds structures, at least 51% exposure to SFDR Article 8 or 9 funds, otherwise to underlying funds rated AAA–BBB or AAA–BB if SFDR classification is unavailable.

SFDR Article 6 (non-ESG) funds require at least BB weighted ESG rating.

#### *ESG Monitoring and Control Mechanisms*

OTP Fund Management operates a multi-tiered and documented monitoring system to ensure continuous oversight of sustainability risks. The responsibility for tracking ESG risks primarily lies with the portfolio managers, while the risk management department oversees the operation of the monitoring framework, evaluates data, and prepares executive reports. Compliance and marketing functions support the process by ensuring that all ESG-related communications meet regulatory standards and avoid greenwashing.

ESG ratings are sourced from external providers, primarily MSCI ESG Research. Each of the environmental, social, and governance dimensions is assessed separately and then aggregated into a single ESG score. These scores are weighted by current market value to reflect portfolio exposure accurately. Ratings are reviewed quarterly, and any significant downgrade - defined as a drop of two rating categories - triggers a formal notification to the portfolio manager, the CEO, and the Head of Investments. Such changes are documented in the quarterly risk management report.

If a portfolio's ESG risk level exceeds the target threshold, the portfolio manager is required to implement corrective measures within 90 calendar days. These may include improving the ESG rating of holdings, increasing the proportion of SFDR Article 8 or 9 funds, or rebalancing the portfolio. Monthly reports are produced to track sustainability risks, while quarterly summaries include updates on ESG ratings, developments in PAI indicators, and the handling of any limit breaches.

External ESG data providers are subject to methodological review at least once every three years. OTP Fund Management may conduct control assessments using alternative sources to validate the reliability of ESG data. Providers must offer sector-specific and issuer-level data, disaggregated ESG scores for E, S, and G factors, and benchmarking against industry averages.

#### *Governance and Decision-Making Structure*

The Fund Management's ESG policy is subject to annual review by the Board of Directors. The most recent revision occurred on 10 June 2025. Responsibility for the policy lies with the Risk Manager and the approval authority is held by the Chief Executive Officer. This governance structure ensures accountability and alignment with regulatory expectations.

#### *Active Ownership and Stewardship*

OTP Fund Management exercises active ownership in companies where it holds significant voting rights. It demands transparent accountability on environmental, social, and ethical matters. Where necessary, the fund manager initiates dialogue with issuers, exercises voting rights, or reduces equity exposure to enforce ESG standards. This stewardship approach reflects a commitment to responsible investment and long-term value creation.

#### 2.1.9.4.9 ESG risk management at other subsidiaries

The Banking group establishes the main ESG-related requirements in Banking group-wide policies (Group Credit Risk Policy, RAS limits, C&E materiality assessment, etc). Consequently, these core principles are implemented by the subsidiary banks, thereby ensuring a consistent approach to ESG risk awareness across the organisation.

DSK Bank has initiated the integration of climate adaptation considerations into its credit and sectoral policies. Physical climate risks - such as drought, flooding, and heat stress - are now systematically assessed during client due diligence and incorporated into lending decisions. These factors are also embedded within the broader risk management framework, including provisions under IFRS 9 and ICAAP. To support client adaptation, DSK Bank has introduced internal green lending targets and portfolio monitoring mechanisms. Disclosure practices follow the expectations set by the ECB and the EBA. In addition, DSK Bank has implemented policies to facilitate the energy transition within its financed portfolio. These policies guide lending decisions toward renewable energy and energy efficiency projects, while limiting exposure to sectors with high fossil-fuel intensity.

OTP Slovenia Group has identified ESG risks as material to its business environment and operating model. ESG risk drivers are integrated into existing risk categories rather than treated as a standalone risk type. The bank has integrated climate and environmental factors into its business strategy, loan origination and risk management frameworks, including both ICAAP and ILAAP. This includes the “Climate and Environmental Risk Management Methodology of OTP Group Slovenia,” which defines relevant time horizons, establishes a register of C&E risk drivers, maps their relevance to individual risk types, and provides a materiality assessment of these drivers; and comprehensive stress testing covering physical and transition risks. C&E risk drivers are embedded in the management of all traditional risk types (credit risk, market and liquidity, operational risk etc). In terms of credit risk management, ESG risk focused due diligence is in place and transition risk assessments are embedded in the bank’s portfolio steering efforts. During 2025, the banks has advanced its physical climate risks assessment framework using geospatial data, which is currently in place for collateral risk assessment. ESG risk management targets (including green financing targets, portfolio emission intensity for the business loan and investment portfolio, and a detailed short term KRI dashboard) are in place and regularly monitored.

In 2025, Ipoteka Bank faced heightened transition risks and new regulatory requirements following Uzbekistan’s declaration of the “Year of the Green Economy.” The local Central Bank initiated a sector-wide survey to assess banks’ green financing policies and actions. Regulatory expectations are tightening under the Strategy for Management of Climate-Related Financial Risks (2025–2027), which aims to integrate climate risks into general risk frameworks. As part of this roadmap, banks were required to conduct self-assessments of their exposure to climate-related financial risks.

OBH Bank finalized recommendations from the Croatian National Bank regarding climate and environmental risk management and adopted the Environmental and Social Risk Management Framework (ESRMF). This framework covers risk identification, assessment, mitigation, control, monitoring, and reporting. OBH also implemented an E&S Risk Management Tool to operationalize these processes.

The implementation of these measures does not require significant expenditures as they are part of the regular operations.

### **2.1.10 [E1-4] Targets related to climate change mitigation and adaptation**

OTP Group has defined two main goals regarding climate change: firstly, a portfolio-specific GHG emission reduction target as part of its climate target setting; and secondly, a target related to green lending.

#### **2.1.10.1 Climate target setting**

In 2024, the Banking group established targets to reduce financed greenhouse gas (GHG) emissions by 2030<sup>50</sup>, in line with regulatory expectations (CSRD/ESRS). These targets were derived from the International Energy Agency’s (IEA) Net Zero Emissions by 2050 (NZE 2050) scenario, which is consistent with limiting global temperature rise to 1.5 °C, and national decarbonisation plans, as required by regulation. Targets were not based on actual transition plans of borrowers (as most of them do not have such plan) and no external stakeholders were involved in the target setting. The targets reflect the Banking group’s portfolio composition, considering country-specific exposures and portfolio segments by borrower activity type. These targets apply to the GHG emissions related to the financing directly provided by the members of the Banking group, but not to the GHG emissions related to the assets managed by OTP Group’s asset and fund management members.

Banking group-level targets were constructed from country-, asset class-, and sector-specific objectives. These were based either on the IEA NZE 2050 sectoral trajectories - aligned with the Paris Agreement - or on national decarbonisation plans whose 2030 emission pathways closely approximate the IEA NZE 2050 sectoral benchmarks<sup>51</sup>. The use of country specific objectives allowed OTP Bank to involve relevant internal stakeholders and subsidiaries in the target setting. Internal stakeholders involved in the process were principally the Green Program Directorate and the Risk Management Department of OTP Bank.

<sup>50</sup> Interim targets between 2023 and 2030 were not established, as they were deemed impractical. The underlying metrics carry significant uncertainty due to data quality limitations and methodological constraints, which prevent the reliable setting of smaller, annual targets. Furthermore, benchmark scenarios - such as the IEA NZE 2050 - do not provide forecast points for intermediate periods prior to 2030.

<sup>51</sup> The definition of targets was carried out internally by OTP Group experts.

### Interpretation of Targets

The interpretation of the targets OTP Group has set is the following: if the economic environment of the Banking group progresses alongside the IEA's Net Zero 2050 scenarios, then the Banking group's financed emissions should reach the pre-defined targets, unless the Group turns to the financing of borrowers which are more carbon-intensive relative to the average of the economy than the current ones. Thus, these targets should be interpreted much more like a "baseline scenario" on which the Banking group's financed emissions progress if the worldwide transition to a carbon-neutral economy is successful. It is important to emphasize that OTP Group alone cannot ensure that these targets will be met if the economic environment follows a completely different trajectory. OTP Group alone cannot enforce the carbon-neutral transition either in the world economy, or in the countries, in which the Group is active. OTP Group can however put in place a number of measures to alter its course away from the path of the general economic environment to some extent (for these actions and measures see subchapter [E1-3]).

### Scope and Methodology

The Banking group's most important reduction targets – as they were set in the Integrated Report of 2024 for the first time – apply to financed Scope 1-2 emissions related to its loan portfolio, excluding sovereign exposures. Boundaries of the financed GHG reduction targets are the same as for the GHG inventory of the Group. The calculation methodology follows the approach for financed emissions under Scope 3, Category 15, as detailed in subchapter [E1-6]. Thus, the primary target metric is emission intensity, defined as grams of CO<sub>2</sub> equivalent per euro of exposure (gCO<sub>2</sub>e/EUR)<sup>52</sup>. This is a relative reduction target metric, rather than specifying an absolute targeted level of financed GHG emissions<sup>53</sup>. The targeted reduction of this relative target metric compares 2030 performance against the 2023 base year. The year 2023 was chosen as the base year for target setting because that was the first year from which the Bank had audited its financed GHG emissions for the first time. Keeping to the 2023 base year is still justified, because the Bank's main activity has not changed, and the composition of its portfolio did not undergo major changes (e.g. no major acquisition or geographical / sectoral rearrangement occurred),

Relative targets defined as financed GHG emissions in a proportion to financed assets provide the most reliable indicator for tracking progress, given that they are less sensitive of portfolio dynamics. In addition, legislation requires OTP Group to publish absolute financed emissions targets for 2030, as well. These are derived from relative targets using a static balance sheet assumption - consistent with regulatory practices such as EBA stress testing - where the Banking group's balance sheet and structure are assumed unchanged until 2030. While this assumption is unrealistic, alternative approaches would be even more speculative. OTP banking group considers absolute targets subordinate to relative targets: achievement of relative reduction objectives constitutes success, even if absolute targets are not met due to factors such as acquisitions or market share growth. To calculate absolute targets, OTP Group relies on its most recent balance sheet: therefore, absolute targets were adjusted this year for the 2025 balance sheet while keeping the relative target unchanged, of course. OTP Group disclosed its methodology for calculating GHG emissions in subchapter [E1-6].

### 2030 Reduction Target

The Banking group's reduction target for financed Scope 1-2 emissions intensity of its portfolio (excluding sovereign exposures) is (29.8)% by 2030 compared to 2023. This corresponds to reducing the 2023 Scope 1-2 emission intensity of 219 gCO<sub>2</sub>e/EUR (0.57 gCO<sub>2</sub>e/HUF) to 154 gCO<sub>2</sub>e/EUR (0.40 gCO<sub>2</sub>e/HUF) by 2030, assuming unchanged HUF/EUR and other exchange rates. This trajectory is consistent with the IEA NZE 2050 scenario for the global economy.

<sup>52</sup> However, the Group is required to report its financed GHG emissions in HUF due to CSRD requirements. Consequently, both the baseline and target levels for emission reduction are expressed in grams of CO<sub>2</sub> equivalent per HUF (gCO<sub>2</sub>e/HUF). For consistency, the HUF/EUR exchange rate of the base year (2023) is assumed to remain unchanged, and the impact of exchange rate fluctuations is excluded from the assessment of target achievement.

<sup>53</sup> Relative targets are advantageous because they mitigate distortions arising from changes in the Group's size, such as acquisitions, divestitures, or fluctuations in market share.

### Update of the absolute financed GHG targets to adjust for balance sheet growth

While OTP Group considers its 2030 reduction targets on its relative financed GHG intensity of its portfolio as the primary ones, relevant legislation requests the Bank to publish reduction targets for the absolute level of financed GHG emissions. As described above, the Bank calculates these targets on absolute financed GHG emissions assuming static balance sheet. However, as the Bank's balance sheet changes each year, therefore the 2030 target for absolute financed GHG emissions – which is a subordinated target to the relative GHG-intensity target of the Bank - has to be adjusted to reflect the actual size of the Banking group's financed assets each year, too. This technical adjustment process is overseen and approved by the Head of the Green Program Directorate of the Bank. According to the aforementioned, the Group's relevant financed assets as they were at the end of 2025, were used to re-calculate the 2030 targets on the absolute financed GHG emissions (assuming the static balance sheet on the basis of 2025, instead of 2023 as at the previous report), while keeping the relative GHG emission intensity targets unchanged.

OTP banking group's target settings for financed Scope 1-2 emissions and without the sovereign portfolio				
	2023, base year for GHG intensity	2025, base year for balance sheet	Climate target setting 2023-2030	2030, target
Total financed Scope 1-2 emissions (tCO <sub>2</sub> e)	9,183,905	9,529,393		7,976,777*
Total loan volume from all PCAF-asset classes except sovereign (HUF million)	16,024,767	19,826,892	static balance sheet assumption (basis: 2025)	19,826,892
Financed Scope 1-2 GHG intensity of the portfolio without sovereign (gCO <sub>2</sub> e / HUF)	0.57	0.48	(29.8)%	0.40
<i>CAGR of targeted reduction rate (2023-2030):</i>			<i>(4.9)%</i>	

\*Note: the previous absolute target level as published in the previous Integrated Report on the basis of the total assets as at 2023 was 6,447,102 tCO<sub>2</sub>e.

The Banking group establishes targets for all GHG emissions - including Scope 3 - and for its entire portfolio, including sovereign exposures, in accordance with the Partnership for Carbon Accounting Financials (PCAF) Standard<sup>54</sup>, Scope 3 Category 15. However, within this broader scope, numerous items present significant methodological challenges, making the quantification of financed emissions for the base year or future years highly speculative and lacking robustness (even more than it is the case for financed Scope 1-2 emissions without the sovereign portfolio).

Consequently, the Banking group will consider its climate targets for financed emissions to be achieved if it meets the relative reduction target for financed Scope 1-2 emissions (excluding sovereign exposures), even if targets covering financed Scope 3 emissions and sovereign exposures are not fully met.

OTP banking group's target settings for all financed GHG emissions (including financed Scope 1, 2 and 3)				
	2023, base year for GHG intensity	2025, base year for balance sheet	Climate target setting	2030, target
Total financed GHG emissions (tCO <sub>2</sub> e)	25,007,832	29,339,904		21,898,327*
Total loan volume from all PCAF-asset (HUF million)	22,058,449	28,658,271	static balance sheet assumption	28,658,271
Financed GHG intensity of the portfolio in all PCAF asset classes (gCO <sub>2</sub> e / HUF)	1.13	1.02	(32.6)%	0.76
<i>CAGR of targeted reduction rate (2023-2030):</i>			<i>(5.5)%</i>	

\*Note: the previous absolute target level as published in the previous Integrated Report on the basis of the total assets as at 2023 was 16,855,279 tCO<sub>2</sub>e.

### Disclaimers and potential future revisions of targets

The methodology for quantifying financed GHG emissions currently involves a high degree of uncertainty. Consequently, changes in calculation approaches or underlying data may significantly alter estimates of the Banking group's financed emissions, potentially requiring retrospective corrections - even at the level of magnitude. Monitoring progress toward financed emissions reduction targets will therefore necessitate periodic revisions, either to the targets themselves or, more likely, to the base year data against which these targets were set.

<sup>54</sup> GHG Accounting and Reporting Standard for the Financial Industry from the Partnership for Carbon Accounting Financial (PCAF), specifically part A "Financed Emissions" (version December 2022); <https://carbonaccountingfinancials.com/files/downloads/PCAF-Global-GHG-Standard.pdf>

Retroactive adjustments may be justified by developments such as (non-exhaustive list):

- availability of more reliable borrower-reported or measured emissions data;
- changes in price levels (inflation);
- shifts in portfolio composition;
- modifications in public policy related to climate or other relevant areas;
- unforeseen events that make such adjustments reasonable.

The Banking group reserves the right to revise base year estimates, GHG-related indicators, or the targets themselves if circumstances warrant. In the event of such adjustments, the Banking group will provide a clear and satisfactory explanation for the changes. The Banking group did not revise its financed emission targets in 2025 other than adjusting the absolute 2030 targets for the balance sheet growth as described above.

#### *Sectoral targets*

In addition to the – mandatory – portfolio-level GHG reduction targets, in 2025, OTP Bank decided to define an additional sectoral target for its loans provided to electricity producer companies. When doing so, OTP Bank defined electricity producer companies as follows: any companies that produce electricity for the main purposes of selling it (producers for own usage were excluded) or directly or indirectly holds a company that fits this definition. The targeted metric of loans to electricity producers is loan volume weighted average of the company-level GHG emission per electricity produced (expressed in kg CO<sub>2</sub>eq / MWh). Metrics from clients were collected on a best-effort basis, collected metrics are mostly non-audited figures reported by borrowers or estimated based on borrowers' production capacity and country-specific utilisation factors. Fact figures could be collected only for 2024 – as 2025 production data is not available for most of OTP Group's borrower until the cut-off date of this report.

OTP banking group's sectoral target for financed electricity production		
	2024, base year	2030, target
Weighted average of GHG intensity of electricity production (kg CO <sub>2</sub> eq / MWh)	224	209

#### *Disclaimers and potential future revisions of the sectoral targets*

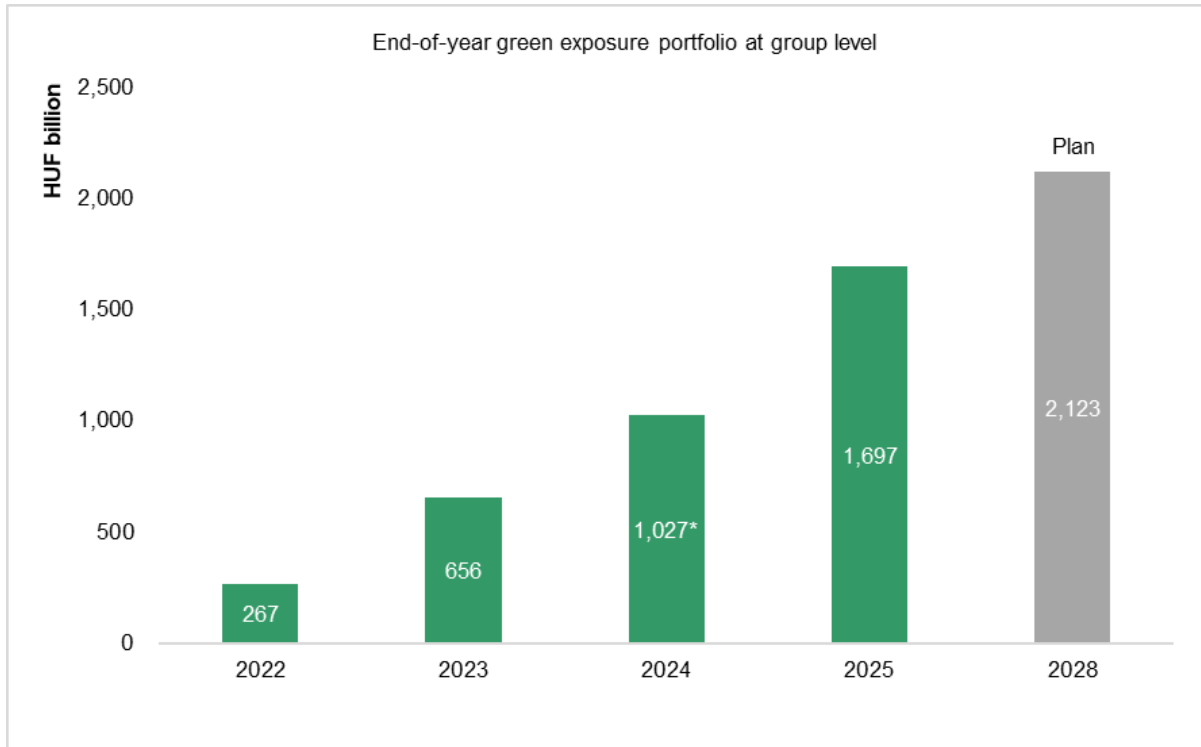
The methodology for quantifying financed GHG intensity of clients in particular sectors (in this case: electricity production) involves still a high degree of uncertainty, which results from difficulties to identify those clients, collect reliable production and GHG emission data, etc. Also, the underlying metrics are subject to uncertainty with regard to portfolio composition effects, changes in the economic environment, etc. Therefore, the Banking group reserves the right to revise base year estimates or the targets themselves of the sectoral targets if circumstances warrant. In the event of such adjustments, the Banking group will provide a clear and satisfactory explanation for the changes.

#### **2.1.10.2 Green lending targets**

As stated in its ESG strategy adopted in 2021, the Banking group maintains its commitment to playing a leading regional role in financing a fair and gradual transition to a low-carbon economy and contributing to a sustainable future through responsible financial solutions.

To support this objective, the Banking group planned to build a green loan portfolio totalling HUF 1,500 billion by 2025. Green lending is a strategic goal across all countries of operation, with two exceptions:

- Russia: Consumer lending dominates the market, making green lending non-prioritized.
- Ukraine: Due to the ongoing war, green lending that meets the Group's standards is not feasible, and its development will remain on hold until the conflict is resolved.



\*The 2024 data were recalculated using the green definitions finalized in 2025. The revised total aggregate value of the previously disclosed 2024 data is HUF 1,189 billion. A detailed breakdown is provided in Table T-1 of the voluntary report.

Green exposures include corporate green loans and bonds, as well as retail green loans, as defined by OTP Group in subchapter [E1-3].

This portfolio target is not based on scientific evidence but reflects the Banking group's strategic intent to finance the transition to a low-carbon economy. Achieving this goal is expected to contribute to revenue growth for the Banking group. The objective was defined with the involvement of the relevant departments of the banking group, with the subsidiaries and business areas affected by the green KPI, on both the corporate and retail sides.

One of the six priorities defined in OTP Group's 2026-2028 Sustainability Strategy, a key focus is continued enhancement on green lending activities. The Group aims to achieve a green lending portfolio of HUF 2,123 billion by 2028, representing a compound annual growth rate of 12% relative to the green target set for 2025.

Green lending targets are also detailed and established on entity and asset class levels, which ensure the involvement of all relevant internal stakeholders and subsidiaries in the target setting.

### 2.1.10.3 Climate change related targets of subsidiaries

All banking subsidiaries of OTP Group prepare and monitor their own ESG strategies, which include climate change related targets as well. As part of its strategy, DSK Bank has established internal targets to support climate mitigation within its financed portfolio and operational activities. These targets are aligned with OTP Group's climate and ESG policies and with local climate risk priorities.

They include:

- **Portfolio adaptation and resilience:** Increasing the share of green loans in material sectors such as agriculture and real estate, while monitoring climate-related exposures across the lending portfolio. Data sources include client applications, internal reporting, and sectoral analyses. Stakeholders from risk and business units are actively involved in defining and tracking progress.
- **Sustainable financing and emission reduction:** Expanding sustainable financing in high-impact sectors - real estate, transportation, energy, and agriculture - while reducing emissions associated with the Bank's own operations. These targets apply to all lending and operational activities in Bulgaria and are aligned with OTP Group's climate and ESG policies.
- **Climate mitigation in financed portfolio:** Setting subsidiary-level targets to progressively reduce portfolio emissions intensity and increase green lending in the most material sectors (power, real estate, transport). These targets are aligned with the EU Taxonomy and the GAAT. Progress is monitored through DSK-specific KPIs and disclosed in sustainability reporting, where relevant, on the investments side.

The implementation of these measures does not require significant expenditures as they are part of the regular operations.

OTP Bank Slovenia in its ESG strategy and risk policies has defined:

- **Portfolio resilience:** An overall GHG emissions reduction target for the business loan and investment portfolio, supported by a benchmark based portfolio steering mechanism in the most polluting sectors (electricity generation, steel, aluminium, cement) is in place. This approach has been further extended in the newly developed prudential transition plan of the OTP Group Slovenia, that has been implemented early 2026.
- **Green financing targets:** expanding sustainable financing in high-impact sectors - real estate, transportation, energy, in line with the frameworks defined by OTP bank.
- **Own operations related targets:** the bank has defined emissions reduction targets in terms of its own operations, and various actions has been taken to support this (purchasing green electricity, establishing solar power plants on two office buildings in Maribor, electrification of the car fleet, etc.). Targets aligned with the Group initiative will be defined in 2026.

### 2.1.11 [E1-6] Gross Scope 1, 2, 3 and Total GHG emissions

Methodologies and assumptions used in calculating GHG emissions are detailed in the reporting policy regarding chapter E. OTP Group has set mandatory target for overall financed GHG emission for 2023 in its 2024 Integrated Report for the first time. This target has been revised due to the following: OTP Group's main target metric with regard to its financed GHG emissions are expressed in terms of GHG intensity of the financed portfolio, i.e. in terms of financed emissions / financed exposures. OTP Group calculated the mandatory 2030-target for its overall financed GHG emissions applying its financed GHG intensity target and assuming static balance sheet. Thus, the targeted overall financed GHG emission for 2030 was calculated by multiplying the targeted GHG intensity and the actual total assets in all PCAF asset classes as at the end of 2023. However, as the total assets in the PCAF asset classes have changed (increased) since 2023, the overall financed GHG emission target for 2030 has been revised (increased) in line with the experienced balance sheet growth (while keeping the GHG intensity target constant).

OTP Group's gross Scope 1, Scope 2, and Scope 3 GHG emissions are presented in the table below.

OTP Group's GHG emissions								
Retrospective						Milestones and target years		
Operating segment	Base year 2023	Comparison 2024 (restated)	2025	%, 2025/2024	2025	2030	Annual% target value / Base year	
<b>Scope 1 GHG emissions</b>								
Scope 1 gross GHG emissions (tCO <sub>2</sub> e)	Financial and other subsidiaries	n.a.	24,750	25,539	103	n.a.	n.a.	n.a.
	Agricultural subsidiaries		93,720	117,453	125			
	<b>Total</b>		<b>118,470</b>	<b>142,992</b>	<b>121</b>			
Percentage of GHG emissions from regulated emissions trading schemes in Scope 1 (%)	Financial and other subsidiaries	0	0	0	0	0	0	0
	Agricultural subsidiaries							
	<b>Total</b>							
<b>Scope 2 GHG emissions</b>								
Scope 2 gross GHG emissions – location-based (tCO <sub>2</sub> e)	Financial and other subsidiaries	n.a.	48,976	52,994	108	n.a.	n.a.	n.a.
	Agricultural subsidiaries		7,125	5,990	84			
	<b>Total</b>		<b>56,101</b>	<b>58,984</b>	<b>105</b>			
Scope 2 gross GHG emissions – market-based (tCO <sub>2</sub> e)	Financial and other subsidiaries	n.a.	33,826	34,039	101	n.a.	n.a.	n.a.
	Agricultural subsidiaries		11,755	10,479	89			
	<b>Total</b>		<b>45,581</b>	<b>44,518</b>	<b>98</b>			
<b>Significant Scope 3 GHG emissions</b>								
Total <sup>55</sup> gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> e)	Financial subsidiaries <sup>56</sup>	25,007,832	24,835,989	29,339,904	118	n.a.	21,898,327	
15. Investments	<b>Total</b>	<b>25,007,832</b>	<b>24,835,989</b>	<b>29,339,904</b>	<b>118</b>	n.a.	<b>21,898,327</b>	
<b>Total GHG emissions</b>								
Total GHG emissions (location-based) (tCO <sub>2</sub> e)	Financial and other subsidiaries	n.a.	24,909,715	29,418,437	118	n.a.	n.a.	n.a.
	Agricultural subsidiaries		100,845	123,443	122			
	<b>Total</b>		<b>25,010,560</b>	<b>29,541,880</b>	<b>118</b>			
Total GHG emissions (market-based) (tCO <sub>2</sub> e)	Financial and other subsidiaries	n.a.	24,894,565	29,399,482	118	n.a.	n.a.	n.a.
	Agricultural subsidiaries		105,475	127,932	121			
	<b>Total</b>		<b>25,000,040</b>	<b>29,527,414</b>	<b>118</b>			

While validating comparative information, the Group detected an inaccuracy in a subsidiary's electricity consumption data that had caused last year's Scope 2 emissions (market- and location-based) to be overstated. As this misstatement affected the published figures, a restatement was required, and the correct data have now been reflected in the updated values.

The biogenic emissions were as follows:

OTP Group's biogenic CO <sub>2</sub> emissions	2024	2025
Scope 1 biogenic emission (tCO <sub>2</sub> e)	732	1,489

In 2025, OTP Group acquired and consolidated four companies operating in the agricultural sector in Hungary. GHG emissions associated with the newly consolidated entities are incorporated into Group-level data starting from the date of consolidation, 1 September 2025. The inclusion of these entities increased 2025 gross Scope 1-2 emissions by approximately 3% compared to a like-for-like perimeter; prior-year figures have not been restated.

<sup>55</sup> The total gross indirect emissions of OTP Group (Scope 3) do not include funded emissions related to assets managed by the Group's subsidiaries acting as fund managers, as these assets are not part of the Group's consolidated assets (as they are not owned by OTP Group).

<sup>56</sup> The gross Scope 3 GHG emissions do not include emissions from OTP Group's non-financial subsidiaries, as data for these entities have not yet been calculated.

Allocation of OTP Group Scope 1-2 emissions, 2025				
	Consolidated financial reporting group		Operational control	
	2024 (restated)	2025	2024	2025
Scope 1 gross GHG emissions (tCO <sub>2</sub> e)	114,940	139,362	3,530	3,631
Scope 2 gross GHG emissions – location-based (tCO <sub>2</sub> e)	51,693	55,639	4,409	3,346
Scope 2 gross GHG emissions – market-based (tCO <sub>2</sub> e)	38,308	40,810	7,273	3,708

Among the Scope 2 emissions, OTP Group members cover part of their electricity consumption with green electricity certified by guarantees of origin or renewable energy certificates. 48.28% of the total electricity consumption comes from such sources. There is no district heating consumption certified by guarantees of origin. 25% of energy consumption comes from renewable energy sources.

GHG intensity based on revenue	2024	2025	%, 2025/2024
Total GHG emissions per net revenue <sup>57</sup> (location-based) (tCO <sub>2</sub> e/million HUF)	5.85	6.19	106%
Total GHG emissions per net revenue (market-based) (tCO <sub>2</sub> e/million HUF)	5.85	6.19	106%

### Scope 3 / Category 15 emissions

Scope 3 / 15 emissions are also referred to as "OTP Group's financed emissions" or "our financed emissions". In this section of the report, we first present OTP Group's financed emissions and later describe the underlying estimation methodology. The Group currently does not quantify GHG emissions for other Scope 3 categories. These categories were assessed as not material compared to Category 15 or cannot yet be reliably quantified due to data limitations. Their exclusion is not expected to change the overall picture of the Group's Scope 3 emissions.

The tables below present OTP banking group's financed emissions for 2025 and 2024, calculated in accordance with the Partnership for Carbon Accounting Financials (PCAF) methodology. Data is broken down by PCAF asset classes and by the emission scope of the clients. The reported Scope 3 / Category 15 emissions cover all on-balance sheet lending and investment exposures in the banking book, excluding trading book positions and derivatives, in line with the PCAF standard.

The Banking group considers the most reliable indicator of its financed emissions to be the aggregate of financed Scope 1-2 emissions across all PCAF asset classes, excluding sovereign exposures, which amounted to 9.5 million tCO<sub>2</sub>e in 2025. This metric provides the most meaningful representation of the Banking group's financed carbon footprint, as Scope 3 emission estimates and sovereign exposure calculations are subject to significant uncertainty (even higher than that of Scope 1-2 estimations, which is not low, either).

The composition of financed Scope 1-2 emissions is as follows:

- Business loan segment: 70.7% of total financed emissions, representing the largest contributor.
- Vehicle financing portfolio: 21.2% share, a material contributor to overall emissions.

Real estate-related portfolios (residential and commercial) represent only a small fraction of total financed emissions, consistent with macro-level statistics on the building sector's share of global GHG emissions.

Financed Scope 1-2 emissions (without sovereign exposures) increased in 2025 by 15% compared to 2024. All assets in the relevant PCAF asset classes without the sovereign exposures grew by 11% over the same period, although changes in the HUF/EUR exchange rate distorted the latter figure (as the HUF appreciated vis-à-vis the euro by 6%. If the HUF/EUR exchange rate remained constant over 2025, then the increase of the exposures in the relevant PCAF asset classes without the sovereign exposures in EUR would have been somewhat higher (+18%) than the increase of the financed Scope 1-2 emissions (without the sovereign exposures).

<sup>57</sup> Net revenue used for the intensity metrics is calculated based on the net revenue presented in the consolidated IFRS financial statements of OTP Bank Plc, which comprises total interest income and incomes similar to interest income, net profit from fees and commissions, and other operating income.

The PCAF data quality score for OTP Group's relevant PCAF asset classes without the sovereign exposures improved slightly from 4.2 to 4.1 (lower score indicates better data quality). The expected break-through in terms of data quality due to the CSRD's entry into force in 2025 has not occurred: while the CSRD (and its national implementations in EU-countries) obliged large corporations to publish their GHG emission figures (which can be an input of banks' financed GHG figures) for the business year of 2024 for the first time, many of such corporations in countries in which OTP Group is active are exempted from this regulation due to the "consolidation rule": if their parent company publishes group-level CSRD-report, they do not have to. As most of the parent company-level CSRD reports do not include a country- or entity-level break-down of the GHG emissions, OTP Group could not rely on a materially increased number of reported GHG emissions from large companies in the CEE region.

It also has to be noted that in some cases the availability of data used for the financed GHG estimations does not even meet the requirements of the worst PCAF data quality score bucket (which is 5): for example, the PCAF Standard assumes that all data necessary to calculate the attribution factor (in case of business loans: loan volume / total assets of the client or in case of mortgages and vehicles: loan volume / value of the asset) are available, whereas, in reality, they are not (for example: private entrepreneurs do not have published balance sheet in many countries, therefore no attribution factor for them can be calculated).

For such loans, we apply the lowest possible PCAF data quality score, which is 5. The share of such loans was 27.7% within the corporate exposures (based on loan volume), 32.9% for vehicle loans and 0.8% for mortgages and 5.6% for commercial real estate financing.

OTP banking group's total financed emissions broken down by emission scopes and asset classes, 2025						
PCAF asset class	PCAF average data quality score	Total exposure	Financed Scope 1 emission	Financed Scope 2 emission	Financed Scope 3 emission	Total financed emissions
<i>(Unit of measurement):</i>	<i>(1-5)</i>	<i>(million HUF)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>
Listed equity and corporate bonds	4,4	533,415	192,419	35,191	637,996	865,607
Business loans, unlisted equity and project loans	4,0	9,242,712	5,306,553	1,205,422	12,462,338	18,974,313
Commercial real estate financing	4,6	822,156	70,871		n.a.	70,871
Mortgages	4,0	6,908,056	696,700		n.a.	696,700
Vehicle loans	4,7	2,320,554	2,009,036	13,200	n.a.	2,022,237
<b>Total without sovereign debt</b>	<b>4,1</b>	<b>19,826,892</b>	<b>9,529,393</b>		<b>13,100,335</b>	<b>22,629,728</b>
Sovereign debt	1,4	8,831,379	3,678,478	710,464	2,321,235	6,710,176
<b>Total (all PCAF asset classes)</b>	<b>3,3</b>	<b>28,658,271</b>	<b>13,918,335</b>		<b>15,421,570</b>	<b>29,339,904</b>

OTP banking group's total financed emissions broken down by emission scopes and asset classes, 2024						
PCAF asset class	PCAF average data quality score	Total exposure	Financed Scope 1 emission	Financed Scope 2 emission	Financed Scope 3 emission	Total financed emissions
<i>(Unit of measurement):</i>	<i>(1-5)</i>	<i>(HUF million)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>
Listed equity and corporate bonds	4,4	549,420	169,045	32,618	472,556	674,219
Business loans, unlisted equity and project loans	4,1	8,558,410	4,339,808	1,095,399	10,094,675	15,529,883
Commercial real estate financing	4,8	706,425	47,570		n.a.	47,570
Mortgages	4,1	6,035,650	586,892		n.a.	586,892
Vehicle loans	4,6	1,980,147	2,025,430		n.a.	2,025,430
<b>Total without sovereign debt</b>	<b>4,2</b>	<b>17,830,052</b>	<b>8,296,763</b>		<b>10,567,231</b>	<b>18,863,994</b>
Sovereign debt	1,4	8,871,078	3,312,631	623,254	2,036,110	5,971,995
<b>Total (all PCAF asset classes)</b>	<b>3,3</b>	<b>26,701,130</b>	<b>12,232,648</b>		<b>12,603,341</b>	<b>24,835,989</b>

Regarding the financed GHG intensity (financed emissions / outstanding financing volume), which forms the basis of OTP banking group's main climate target (financed emission reduction targets), the most relevant indicator with the smallest - though still material - estimation uncertainty is also the Group's financed Scope 1-2 intensity excluding the sovereign portfolio, which was 0.48g CO<sub>2</sub>e / HUF in 2025, a 3.3% increase compared to 2024. The deterioration compared to 2024 is attributable to the strengthening of the HUF vis-à-vis the euro: OTP Group's financed Scope 1-2 intensity (excluding the sovereign portfolio) expressed in gram CO<sub>2</sub>e / EUR decreased by 2.9% (from 191 CO<sub>2</sub>e / EUR to 185 CO<sub>2</sub>e / EUR). The most GHG-intensive portfolio segments remained the corporate segment and vehicle financing. Note, that OTP Group's current estimation methodology to calculate its financed GHG emissions does not take into account the effects of the overall decrease of GHG emissions experienced over the last 5-6 years in most of the countries, where the Group is present: for example, to estimate the financed GHG emissions of corporate loans, the Group still uses to a large extent the PCAF / Exiobase GHG intensity factors that rely on data from 2019. Thus, the Group's financed GHG emissions presented above might be somewhat overestimated.

It is important to emphasize that OTP banking group had limited influence over many of the factors that have an impact on its financed GHG emissions (e.g. currency effects, changes in portfolio consumption, changes in financing ratios, GHG intensity factors as taken over from PCAF datasets and the quality of data needed for the estimates). OTP Bank will not have full control on these factors in the future, either. Therefore, the observed trend between 2024 and 2025 (or between 2023 and 2025) cannot be extrapolated. On the contrary, the potentially significant year-on-year variation – that can be observed in the comparison of the Group's 2023 and 2025 data – underscores the methodological limitations and low robustness of the carbon footprint calculation based on the PCAF Standard. Change of potential large magnitude in either direction cannot be ruled out in the following years.

Financed GHG intensity (financed emissions / loan volume provided) of OTP banking group's portfolio in 2025				
PCAF asset class	Financed Scope 1 intensity	Financed Scope 2 intensity	Financed Scope 3 intensity	Total emission intensity
	(gCO <sub>2</sub> e / HUF)	(gCO <sub>2</sub> e / HUF)	(gCO <sub>2</sub> e / HUF)	(gCO <sub>2</sub> e / HUF)
<i>(Unit of measurement):</i>				
Listed equity and corporate bonds	0.36	0.07	1.20	1.62
Business loans, unlisted equity and project loans	0.57	0.13	1.35	2.05
Commercial real estate financing		0.09	n.a.	0.09
Mortgages		0.10	n.a.	0.10
Vehicle loans	0.87	0.01	n.a.	0.88
<b>Total without sovereign debt</b>	<b>0.48</b>		<b>0.66</b>	<b>1.14</b>
Sovereign debt	0.42	0.08	0.26	0.76
<b>Total (all PCAF asset classes)</b>	<b>0.49</b>		<b>0.54</b>	<b>1.02</b>

Financed GHG intensity (financed emissions / loan volume provided) of OTP banking group's portfolio in 2024				
PCAF asset class	Financed Scope 1 intensity	Financed Scope 2 intensity	Financed Scope 3 intensity	Total emission intensity
	(gCO <sub>2</sub> e / HUF)	(gCO <sub>2</sub> e / HUF)	(gCO <sub>2</sub> e / HUF)	(gCO <sub>2</sub> e / HUF)
<i>(Unit of measurement):</i>				
Listed equity and corporate bonds	0.31	0.06	0.86	1.23
Business loans, unlisted equity and project loans	0.51	0.13	1.18	1.81
Commercial real estate financing		0.07	n.a.	0.07
Mortgages		0.10	n.a.	0.10
Vehicle loans		1.02	n.a.	1.02
<b>Total without sovereign debt</b>	<b>0.47</b>		<b>0.59</b>	<b>1.06</b>
Sovereign debt	0.37	0.07	0.23	0.67
<b>Total (all PCAF asset classes)</b>	<b>0.46</b>		<b>0.47</b>	<b>0.93</b>

### *Sensitivities of the financed GHG emissions to potential measures to reduce them*

The Banking group will monitor the trajectory of its financed GHG emissions through 2030 to assess whether achieving the defined reduction targets remains realistic. While the Banking group cannot control many factors impacting its financed GHG emissions (such as macroeconomic and regulatory developments, behaviour of the clients, technological developments needed for the carbon-neutral transition, etc.), it can implement measures to reduce its financed GHG emissions independently.

We have assessed the sensitivity of the Group's financed GHG emissions to a non-exhaustive list of potential measures, which are presented in the accompanying table, along with estimated impacts on financed GHG emissions per unit of exposure. This list of measures and the relevant impact estimations were calculated based on the portfolio consumption and the estimate on of the financed GHG emissions of different asset types in OTP Group's portfolio as they were as the end of 2025. The assessed measures fall into two categories:

- portfolio rebalancing toward low-emission assets, such as increasing green loans, transition financing, and electric vehicle financing, which would lower financed GHG intensity.
- portfolio exit from high-emission sectors, such as reducing exposure to coal-based power generation, mining, and other polluting industries, thereby decreasing the Banking group's share of responsibility for borrower emissions.

Sensitivity analysis of potential steering measures and their estimated impacts on Banking group's financed Scope 1-2 emissions per HUF of exposure impacted		
Short name of measure	Impact in gCO <sub>2</sub> e emission / HUF of exposures impacted	Description of measures
1. More green loans	(1.61)	Share of green loans would increase
2. Lower financing ratios	(0.69)	The loan volume weighted average financing ratio (attribution factor) would be decreased
3. Cutting financing to coal-fuelled power plants	(1.61)	Annulate all loans where borrowers' electricity production is fuelled by coal in more than 25% and provide the same amount of loans to average companies
4. Cutting finance to the mining industry	(2.35)	Annulate all loans to the mining industry and provide the same amount of loans to average companies
5. Less financing to heavy industries	(0.45)	Decrease loans to cement, steel, iron, aluminium, chemicals by 50% and replace them with loans to the "rest of the economy" (service sector)
6. Less vehicle loans	(0.18)	Decrease the amount of vehicle loans and provide the same amount of loans to an "average" client (based on total portfolio average emission intensity)
7. More electric cars	(0.15)	An increase of electric cars within the car finance

Note: the interpretation of the above table is the following: the estimated impact indicates the amount of GHG emissions in gCO<sub>2</sub>e / HUF exposure impacted by the measure. E.g. (0.15) gCO<sub>2</sub>e / HUF in case of measure "7. More electric cars" means that the Group's Scope 3 / Category 15 GHG emission would decrease by 0.15 gCO<sub>2</sub>e if 1 HUF of loan amount would be allocated to a car loan financing an electric car, whereas 1 HUF of loan would be withdrawn from (or not provided to) a car loan financing an "average vehicle" (that is mostly a petrol-fuelled one).

The sensitivities were calculated under a static balance sheet assumption, comparing exposure-weighted financed emissions before and after replacing high-intensity assets with lower-intensity ones. GHG intensity values were based on 2025 data and did not account for potential changes by 2030. Scalability constraints were not considered; for example, the Banking group cannot withdraw more financing from coal-based power producers than its current exposure. Similarly, contractual maturities and market demand for low-emission loans were excluded from the aspects of analysis. When calculating the impact from more green loans, we considered the GHG savings from financing renewable energy projects, that might overestimate the impacts from green lending in general on the Bank's financed GHG as some green loans do not have clear and direct GHG emission saving potential (e.g. irrigation related projects). Therefore, these measures should be interpreted as indicative strategic directions rather than a detailed, actionable plan.

Publishing the above sensitivity analysis with regard to the enlisted measures does not mean that the Banking group will commit itself to the Implementation of any measures. Decisions on these measures will remain discretionary and will consider not only the potential for reducing financed GHG emissions but also financial interests of the Group, social responsibility, impacts on stakeholders, feasibility, energy security and economic interests of the Banking group's operating environment.

#### Financed Emissions of Managed Assets

In addition to banking operations, OTP Group includes subsidiaries engaged in asset and fund management. Estimated financed GHG emissions associated with assets managed by these entities amounted to 6.4 million tCO<sub>2</sub>e in 2025, covering all emission scopes and calculated on a coverage-adjusted basis. The estimation was performed by MSCI as an external service provider, except for real estate fund assets, which were assessed internally by OTP Group.

It is important to note that OTP Group does not consider funded issuance related to assets managed by its asset and fund management subsidiaries as part of the Group's own funded issuance. These assets are not owned by OTP Group and are excluded from the Group's consolidated balance sheet.

Financed GHG emissions related to assets managed by OTP Group's fund and asset management members in 2025					
Asset class	PCAF average data quality score	Managed assets	Coverage-adjusted financed emissions (Scope 1 and 2)	Coverage-adjusted financed emissions (Scope 3)	Coverage-adjusted financed emissions (Total)
<i>(Unit of measurement):</i>	<i>(1-5)</i>	<i>(HUF billion)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>
Assets not in real estate funds	3.5	4,950	1,883,106	4,543,737	6,426,843
Assets in real estate funds	5.0	604	3,768	15,227	18,995

Financed GHG emissions related to assets managed by OTP Group's fund and asset management members in 2024					
Asset class	PCAF average data quality score	Managed assets	Coverage-adjusted financed emissions (Scope 1 and 2)	Coverage-adjusted financed emissions (Scope 3)	Coverage-adjusted financed emissions (Total)
<i>(Unit of measurement):</i>	<i>(1-5)</i>	<i>(HUF billion)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>	<i>(tCO<sub>2</sub>e)</i>
Assets not in real estate funds	3.7	4,209	1,616,427	3,210,721	4,827,148
Assets in real estate funds	5.0	691	4,055	16,386	20,441

## 2.1.12 [E1-7] GHG removals and GHG mitigation projects financed through carbon credits

### *Carbon Neutrality Measures and Offsetting Activities*

In 2025, OTP Bank purchased carbon credits amounting to 7,000 tCO<sub>2</sub>e, which did not cover its total Scope 1-2 emissions. These credits were retired during the reporting period and verified under the Verified Carbon Standard (VCS) by Verra. The Bank prioritizes supporting offset projects located in countries where the Group operates; therefore, the credits were sourced exclusively from the Sant Nikola Wind Farm near Kavarna, Bulgaria, the largest wind farm in the country.

All carbon credits used in 2025 originated from this single reduction project outside OTP Bank's value chain. Consequently, 100% of the credits are reduction credits and 0% are removal credits, 100% of them are certified under the VCS quality standard, and none qualify as corresponding adjustments under Article 6 of the Paris Agreement<sup>58</sup>. OTP Bank purchases only carbon credits that meet internal quality criteria. Any public claims of carbon-neutral operations for OTP Bank relate solely to residual Scope 1-2 emissions that remain after implementing its decarbonisation plan and are explicitly linked to the Group's 2050 net-zero target described in chapter E1-4. OTP Bank's carbon-neutral operations strategy includes the use of carbon credits alongside emission reduction initiatives. The use of credits does not hinder the achievement of the Group's Net-Zero Target for Scope 1-2 emissions by 2050 as detailed in [E1-4] subchapter.

### *Ecosystem Restoration Initiative*

OTP Bank has partnered with Pilisi Parkerdő Zrt. to support local ecosystems and communities. Under this partnership, OTP Bank will provide HUF 228 million over ten years to develop the OTP Green Forest within the 320-hectare Budakeszi Vadaskert area, applying an urban forest concept. The project aims to create a forest that promotes regeneration and climate adaptation, implements sustainable forestry practices, and offers high ecological value as a recreational space for local communities.

The initiative goes beyond offsetting OTP Bank's own greenhouse gas emissions. Its primary focus is on enhancing biodiversity and ecosystem services, while also improving carbon sequestration capacity. Impact measurement and certification will be carried out by the Institute of Environmental and Nature Protection at the University of Sopron.

<sup>58</sup> The project is 100% a mitigation project, implemented 100% in the EU, and certified 100% based on recognized quality standards.

Although detailed figures are not yet available, OTP Bank plans to use the additional carbon sequestration achieved through the OTP Forest to compensate for residual emissions after implementing reduction measures - potentially replacing or complementing carbon credit purchases. OTP Bank does not have a set amount of carbon credits to cancel in the future. Accordingly, the amount of carbon credits planned to be cancelled in future periods is not predetermined and will depend on the level of residual emissions after implementation of the decarbonisation measures and the verified sequestration achieved by the OTP Forest project.

#### [E1-8]

OTP Group does not apply internal carbon pricing.

### 2.1.13 Reporting policy

#### Green lending criteria and definitions used in the voluntary green portfolio report

The green exposure definition is based on the Banking group's green definition, which includes on-balance sheet loans, advances, leases, and bond exposures that have undergone an internal green assessment process and meet the technical screening criteria (TSC) of any of the following frameworks:

- OTP Group Green Loan Framework
- OTP Group Sustainable Finance Framework,
- MNB's Corporate and Municipal Capital Requirement Discount Program
- OTP Mortgage Bank Green Mortgage Bond Framework
- MNB's Green Housing Capital Requirement Discount Program
- NHP Green Home program
- Programs or green definitions established by other national banks in countries where the Bank Group operates.

All of these follow a use of proceeds approach. The criteria under these frameworks are not mutually exclusive, and the Banking group's internal controlling system contains all the necessary flagging to avoid double counting.

For all Hungarian banks, the main criterion system that underpins the Bank's green definitions is the Green Housing Capital Requirement Discount Program and the Green Corporate and Municipal Capital Requirement Discount Program issued by the MNB in 2020-2021. These national programs define the basic criteria for the green portfolios reported by the Bank.

The Green Corporate and Municipal Capital Requirement Discount Program has two pillars, the so called „A” which does not require to be aligned with the Green Loan Principles (GLP) and covers limited set of sectors and use of proceeds categories. The criteria are largely aligned with the Substantial Contribution (SC) requirements of the EU Taxonomy, though they are – by definition – limited to climate change mitigation. Key exceptions include agricultural activities linked to subsidy schemes; projects demonstrating a 30% improvement in energy efficiency, verified through an energy audit; geothermal and biomass projects, which are not required to meet all SC Technical Screening Criteria (TSC); real estate acquisitions that hold at least a Class 'B' Energy Performance Certificate (EPC). On the other hand, the pillar „B” requires to be GLP aligned, however allows the use of the full scope (sector and environmental goals) under EU and/or CBI Taxonomy. Therefore, banks with substantial portfolio in sectors not covered under „A” usually set up a Green Loan Framework.

For non-financial companies, green criteria are included in the following frameworks:

- OTP Group Green Loan Framework where TSC follows EU Taxonomy or CBI sector criteria alignment
- OTP Group Sustainable Finance Framework – Green Bond allocation report (TSC follows EU Taxonomy SC criteria except commercial real estates, where certain level of green building certificates (BREEAM, LEED) is accepted)
- MNB's green corporate and municipal capital requirement discount program (TSC follows EU Taxonomy SC criteria with exceptions stated above)

For households, the green criteria are defined by the following frameworks:

- EU Taxonomy Climate Delegated Act
- The MNB Green Housing Capital Requirement Discount Program (residential real estate lending)
- The NHP Green Home Program (residential real estate lending)
- Green Mortgage Bond Framework (2021, OTP Mortgage Bank Ltd.)

In 2025, the definition for green mortgage has been refined, therefore the related values are recalculated and restated in this report (see subchapter [E1-3].) The review of the retail green KPI definition was approved by the ESG Committee on June 24, 2025. The change applies to exposures that:

- comply with the EU Taxonomy's SC technical requirements but do not meet the DNSH (Do No Significant Harm) criteria, or
- have been developed in line with the principles of the EU Taxonomy, taking local specificities into account, and have been verified by an independent second or third party.

Because these frameworks are not mutually exclusive or in other words overlap each other and serve different purpose, the Bank's interest is to attain best possible capital relief and largest possible asset pool for green bond issuance, considering the maturity of the client's green transition. In most cases this means that green exposures are aligned with the EU Taxonomy SC.

#### Main differences between mandatory EU taxonomy indicators and the voluntary green portfolio

As opposed to the mandatory GAR KPIs, OTP's voluntary green portfolio report provides additional transparency by highlighting the following non-exhaustive differences:

- Green loans and debt securities extended to non-CSR clients (as referenced in Question 16 of the Third Commission Notice);
- Green household exposures that meet only the EU Taxonomy Substantial Contribution (SC) criteria, without full compliance with Do No Significant Harm (DNSH) and Minimum Social Safeguards (MSS) requirements (as referenced in Question 21 of the Third Commission Notice).

Car financing that refers exclusively to exposures associated with electric vehicles. These exposures are classified as green based on their substantial contribution to climate change mitigation under the EU Taxonomy criteria. However, it is important to note that these transactions do not fully meet the Do No Significant Harm (DNSH) requirements.

#### GHG emissions

**Scope 1 emissions:** direct emissions from the company's own activities, such as carbon dioxide from energy use and other greenhouse gases to be considered by ESRS requirements at sites, factories or offices. The sum of GHG emissions from fuel consumption, natural gas consumption, other fuel consumption and air conditioning and server cooler air conditioning leaks and so-called non-mechanical emissions related to agricultural production.

#### **Scope 1 emission factors:**

- mineral, biofuel and natural gas emissions: local NIR (National Inventory Report) or IPCC 2006 guidelines.
- Fuel calorific value: local NIRs or EMEP/EEA air pollutant emission inventory guidebook. In Slovenia, the Slovenian Environment Agency.
- Non-biogenic emissions from biofuel: DEFRA.
- Other fuels: DEFRA or other credible source of the member company.

#### **Scope 2 emission factors:**

- electricity: market-based emission factors are provided by the utility providers, failing which the Group uses the AIB (Association of Issuing Body) residual mix factors where available. In the countries of operation where a residual mix is not available, the local and market factors are the same, the source of the emission factors being the IFI harmonized grid factors. The emission factor for electricity includes only CO<sub>2</sub>. For district heating, the Group uses the emission factor provided by MATÁSZSZ in Hungary, the Energy Institute Hrvoje Požar in Croatia and Bureau Veritas in Slovenia, and the DEFRA factor for the other countries. The local and market factors are the same.

- In the case of renewable electricity purchased through contractual instruments (guarantee of origin or renewable energy certificate), the market-based emission factor is usually 0. The ratio of contracted assets is the total amount of electricity purchased from renewable contract agreements divided by the total amount of electricity purchased. Information on the types of contracted assets is specified in the Guarantee of Origin, Certificates of Origin or Renewable Energy Certificates.

**Scope 2 emissions:** the sum of emissions from electricity and district heating consumption (excluding emissions related to transmission and distribution losses (T&D) – according to the GHG Protocol Corporate Standard).

For certain Scope 1 and 2 emission sources, where actual consumption data were not available at the time of report preparation due to delayed invoicing by utility and service providers, emissions were calculated based on estimated consumption data, using historical consumption patterns and available contractual information.

**Scope 3 emissions:** indirect emissions linked to the company's value chain that do not result from the company's direct activities or energy use. The Group has made an aggregated estimate for all Scope 3 categories and based on the results it is identified that the volume of categories 1 to 14 are not considered significant, therefore the only material Scope 3 emission category is Category 15. Investments. OTP Group only discloses quantitative information for this category in this sustainability statement.

GHG emissions in Scope 3, category 15, i.e. financed emissions, relate to emissions from clients for whom OTP Group provides financing, either in the form of loans or equity investments. OTP Group calculates its financed GHG emissions according to the methodology defined by the PCAF Standard as required by the ESRS. The methodology involves calculating the client's total emissions and then proportioning this by an attribution factor, which is equal to the ratio of the loan granted to the client and the client's balance sheet total or the value of the financed asset. Based on the standard, this attribution factor determines the extent to which the Bank finances the GHG emissions of the client. To estimate client's emissions, the Group relies in some rare cases on borrower's public GHG emission figures, but mostly on primary financial data of clients, which are then multiplied by emission coefficients available in PCAF databases to which OTP Group – as a PCAF-signatory – has access. When estimating financed emissions, the PCAF Standard expects clients' GHG emissions to include their Scope 1, Scope 2 and Scope 3 emissions. While the Scope 1 and Scope 2 emissions of clients can be measured or estimated with relative certainty, although these figures remain the subject of many distortions resulting from sector level aggregation, time delays in available data, impacts from inflation, etc, but the quantification of Scope 3 emissions of clients is only possible with a very high degree of uncertainty, being much closer to speculations than reasonable estimations. When publishing its financed emissions, OTP Group discloses its clients' Scope 1, Scope 2 and Scope 3 emissions in accordance with PCAF standard requirements. We interpret our targets based on our financed emissions as our clients' Scope 1 and Scope 2 emissions due to their (relatively higher) reliability.

**Emissions of a consolidated financial reporting Group:** emissions from assets included in the balance sheet of entities belonging to a consolidated accounting group in accordance with the IFRS, from a financial control perspective, including emissions from assets in accordance with IFRS 16.

**Emissions under operational control (relevant for Scope 1-2 emissions):** Operational control is defined as the situation where the undertaking has the ability to direct the operational activities and relationships of the entity, site, operation or asset. Emissions from entities that are not part of the consolidated financial reporting Group, including investee companies (e.g., associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group), as well as joint arrangements not structured through the entity (i.e., jointly controlled operations and assets). The company exercising operational control must report on the emissions of the entity under operational control. The scope of consolidation is the same as that of the financial statements; however, it may differ for assets under operational control that are not consolidated in the financial statements if the reporting standard requires reporting on these assets.

The calculation methodology for Scope 1 and 2 emissions is the same for entities included in the consolidated scope and those under operational control. In the case where no utility bill is available, an estimate is made for the missing items, based on historical data already available.

The CH<sub>4</sub> and N<sub>2</sub>O content of biogenic emissions is also part of Scope 1 emissions. The Group calculates the biofuel consumption rate using default values; if the biofuel content of the fuel consumed differs, it uses individual rates.

If the emissions from air conditioners and server coolers are not available, an estimate is made based on historical data already available.

To convert GHG emissions to carbon dioxide equivalent, we use the latest IPCC Assessment Report (currently IPCC – Sixth Assessment Report).

The so-called non-mechanical GHG emissions related to agricultural production are calculated on the basis of the GHG Protocol Agricultural Guidance, using a calculator developed by AKI Agrárközgazdasági Nonprofit Kft. The emission source categories considered in the calculator are defined in accordance with the GHG Protocol, and the methodologies are based on the Intergovernmental Panel on Climate Change (IPCC) guidelines. The calculator quantifies the CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emissions associated with crop and livestock production. In crop production, N<sub>2</sub>O emissions from the use of fertilizers and manure; CO<sub>2</sub> emissions from the use of urea and CAN-type fertilizers; CO<sub>2</sub> emissions from soil liming; N<sub>2</sub>O emissions from crop residues; and indirect N<sub>2</sub>O emissions (from atmospheric deposition and nitrate leaching) have been determined. In animal husbandry, CH<sub>4</sub> emissions from animal digestion and CH<sub>4</sub> and N<sub>2</sub>O emissions from manure management have been determined. The applied time frame in the calculation is the financial year, not the sowing year in agriculture.

**GHG intensity:** The Group calculates the GHG intensity ratio using the following formula: Total GHG emissions (tCO<sub>2</sub>e) / Net revenue (million HUF). Net revenue as presented in the consolidated IFRS financial statements of OTP Bank Plc comprises total interest income and incomes similar to interest income, net profit from fees and commissions, and other operating income. GHG intensity rates are published using both the location-based and market-based methods.

## 2.2 [E4] Biodiversity and ecosystems

The material topics and related IROs for OTP Group under ESRS E4 Biodiversity and ecosystems are presented below:

E4 – BIODIVERSITY AND ECOSYSTEMS			
Downstream - Financial services			
Climate change	(-) I	Climate-related identified physical risks	Sectors with a high environmental footprint such as agriculture, construction and real estate, manufacturing, transportation and energy account for a significant share in OTP Group's portfolio. The financed sectors' operation contributes to climate change that has negative effects on biodiversity and ecosystems in general terms.
Own operations - Agricultural activities			
Land-use change	(-) I	Climate-related physical risks	Agricultural activities (growing crops, necessary facilities of animals, feeding and grazing) require large land areas for operation. The exact area of land occupied by a given producer depends on factors such as farming practices, yield potential, and regional conditions.

For a more detailed description of the impacts, risks and opportunities and how OTP Group manages them, see subchapter ESRS 2, [SBM-3] and the following sections of this chapter. OTP Group has opted to apply the phase-in provisions for ESRS E4 on biodiversity and ecosystems. As a result, the Group currently provides only limited information on its related policies, actions, targets, and metrics.

E4 – Biodiversity and ecosystems			
Material sustainability matters	Identified IRO	Group-level targets	Group-level actions
Downstream - Financial services			
Climate change	(-) I	Climate-related identified physical risks	No target or action is available.
Own operations - Agricultural activities			
Land-use change	(-) I	Climate-related physical risks	No targets or actions are defined at the agricultural subsidiary level

As a financial group, OTP Group mainly takes into account of these biodiversity-related impacts through its lending activities, risk management frameworks and agricultural subsidiaries that may operate on or near sensitive ecosystems.

At present, OTP Group does not have a specific set of group-wide policies, actions, targets, or measures dedicated exclusively to biodiversity and ecosystems. To effectively incorporate biodiversity considerations into its operations, the Group would require further and more detailed analysis of related risks, impacts, and opportunities. At this stage, such integration has not been implemented.

### Measures related to biodiversity in financial services

From a policy perspective, biodiversity and ecosystems are currently addressed as part of broader environmental and social risk expectations. OTP Group requires its clients to comply with all applicable environmental and social laws and regulations and to hold the necessary permits and licenses for their operations, including those related to biodiversity and ecosystems. These minimum expectations are monitored across the Group.

In Hungary, corporate lending activities follow the Hungarian National Bank requirements, which mandate the application of a dedicated assessment framework and a minimum ESG questionnaire. This due diligence process includes the assessment of environmental and climate risks, with specific elements addressing biodiversity and ecosystem impacts in the due diligence questionnaire. More information is presented in subchapter [SBM-3] Credit risk.

OTP Bank Moldova has partnered with IFC under the Smart Agriculture project, promoting regenerative farming practices, soil health improvement, GHG emission reduction, which are expected to enhance biodiversity.

OTP Bank Serbia's ESG Strategy sets clear targets to expand its green lending portfolio, focusing on renewable energy projects, clean transportation (including electric vehicle financing), and green buildings. Environmental and Social Due Diligence is conducted for these projects, including biodiversity impact assessments. As a signatory to the UNEP FI Principles for Responsible Banking, the Bank conducted its first portfolio impact analysis in 2025, identifying biodiversity as a priority area for future action aimed at reducing negative impacts associated with its activities. Additionally, OTP Bank Serbia launched OTP Village, an urban apiary and nursery featuring 12 nectar-bearing plant species, as part of its CSR initiatives to support ecological activism and highlight the role of bees in ecosystem preservation.

*Measures related to biodiversity in agricultural subsidiaries*

In addition to measures in financial services, OTP Group's agricultural subsidiaries also implement practices aimed at protecting biodiversity and ecosystems. Certain Group entities, such as Agromag Plusz Kft. and Nemesszalóki Mezőgazdasági Zrt. operate on or near Natura 2000 protected areas. Their activities are carried out in compliance with applicable nature conservation and environmental regulations, including the required notifications and reporting to the competent authorities, in order to minimise impacts on these protected sites. These measures ensure responsible management of operations in proximity to protected ecosystems.

To manage risks arising from climate change, Szekszárd Group – operating in the agricultural sector in Hungary – applies drought-tolerant crop varieties and hybrids that maintain growth under water-stressed conditions. To preserve soil moisture, mulching and no-till cultivation methods are implemented. Crop rotation practices are applied to maintain soil health and biodiversity. Plans are in place to develop irrigation systems that ensure timely water supply for cultivated areas. To reduce the environmental footprint of agricultural activities, the number of field operations is optimised, and input use is reduced. Organic manure generated at livestock facilities is utilized to decrease reliance on synthetic fertilizers.

## 2.3 EU Taxonomy: Disclosures under the EU Taxonomy Regulation

### EU Taxonomy Regulation Disclosures

Information to be disclosed by companies covered by Articles 19a or 29a of Directive 2013/34/EU of the European Parliament and of the Council (EU) 2020/852 on environmentally sustainable economic activities, based on the methodology set out in Commission Delegated Regulation (EU) 2021/2178. For the credit institutions of OTP Group, the reporting is based on exposures and balance sheets corresponding to the scope of prudential consolidation according to Section 2 of Chapter 2 of Title II of Regulation (EU) No 575/2013, as set out in Annex V, point 1 of the current Commission Delegated Regulation (EU) No 2021/2178.

#### Mandatory Disclosures

The Taxonomy Regulation applies to financial market participants that make available financial products and undertakings which are subject to the obligation to publish a non-financial statement or a consolidated non-financial statement pursuant to Article 19a or Article 29a of Directive No. 2013/34/EU of the European Parliament and of the Council, respectively (Article 1 2. (b) and 2. (c) of Chapter I of (EU) 2020/852). Pursuant to Article 8 of the Taxonomy Regulation, any undertaking which is subject to an obligation to disclose non-financial information pursuant to Article 19a or Article 29a of Directive No. 2013/34/EU shall include in its non-financial statement or consolidated non-financial statement information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable under Articles 3 and 9 of (EU) 2020/852 Regulation. OTP Group report is based on the exposures and balance sheet according to the scope of prudential consolidation in accordance with Regulation (EU) No. 575/2013, Title II, Chapter 2, Section 2 for the types of assets and accounting portfolios specified in point 1.1.2 of Annex V of Commission Delegated Regulation (EU) No. 2021/2178, including information on stock and flows, on transitional and enabling activities, and on specialized and general purpose lending.

The tables below present the consolidated information on OTP Group's mandatory KPIs under Regulation (EU) No. 2020/852 (Taxonomy Regulation), which have been prepared using the templates published in Annex VI of Regulation No. 2021/2178. The gross carrying amount is based on the reference date of 31. December 2025.

OTP Group discloses the relevant KPIs on a consolidated basis, considering the scope of prudential consolidation, in accordance with Annex V, point 1.1.1 of EU 2021/2178. Accordingly, the exposures of the various subsidiaries, including those of fund managers and credit institutions, are part of the consolidated credit institution KPIs.

In relation with D section 9 question of the third Commission Notice (C/2024/6691) of the publication of the table published in Annex II, OTP Group has assessed the share of sales revenue generated by non-financial entities within the consolidated group and states the following:

The combined contribution of non-financial subsidiaries to OTP Group's turnover is below 5% for 2025. As the revenue from financial activities is insignificant and the preparation of such consistent data and reliable information would require a disproportionate allocation of resources, the Bank has decided not to disclose this information.

For OTP Fund Management Ltd, the regulatory requirements applicable to asset managers have been duly considered, and the corresponding KPIs are presented in a dedicated chapter of this report.

The Bank has prepared its report for the 2025 financial year in accordance with the rules of the Disclosures Delegated Act (delegated regulation) that were in force until 31 December 2025, prior to the amendments introduced by the Omnibus Delegated Act. In compiling the report, we applied the previous reporting templates, methodologies, and disclosure requirements.

The calculation of the main KPI indicators has been based on the best understanding of the requirements set out in the Delegated Regulation and the KPIs have been set accordingly.

In accordance with the legislation, the main KPI indicators are calculated as a proportion of total GAR assets, which is not equal to the Bank's total balance sheet. OTP Group's corporate loan portfolio is dominated by companies that are not subject to the obligation to disclose non-financial information under Articles 19a or 29a of Directive 2013/34/EU. As the eligible and aligned exposures to these entities are not included in the mandatory disclosure, they are disclosed in the (green lending) section of this report.

The main stock and flow KPI indicators of OTP Group show the following changes compared to the previous year:

Mandatory GAR KPIs of OTP Group		2025		2024	
		Turnover	CapEx	Turnover	CapEx
Main KPI	Green asset ratio (GAR) Stock	0.36%	0.53%	0.10%	0.29%
Additional KPIs	Green asset ratio (GAR) Flow	0.63%	0.93%	0.13%	0.45 %

Analysis of the year's outcomes indicates a growth in key KPIs. For taxonomy aligned stocks, compared to the same data last year, the KPI shows a significant increase on both a CapEx and turnover basis. On turnover basis, our taxonomy aligned exposures increased from 0.10% to 0.36% and on a CapEx basis from 0.29% to 0.53% of GAR assets.

The share of assets included in the calculation of the main KPIs within the total balance sheet increased from 65% to 67%. Compared to 2024, the GAR asset portfolio grew by 8%, while the bank's total balance sheet increased by nearly 4%.

Taxonomy- eligible and aligned exposures to financial institutions have also improved significantly, primarily due to the increased availability of taxonomy disclosures published by financial undertakings. Taxonomy-eligible exposures reach 10% on both a revenue and a CapEx basis, while taxonomy-aligned exposures reach 0.83% on a revenue basis and 1% on a CapEx basis.

In the case of exposures to non-financial corporates, the taxonomy-eligible share exceeds 17% on a revenue basis, while the share that is taxonomy-aligned is above 5%. On a CapEx basis, the corresponding ratios are 22% and 8%, respectively.

In relation to retail exposures, while Substantial Contribution (SC) criterion is met, the Bank cannot currently demonstrate compliance with DNSH and Minimum Safeguards due to data limitations. Consequently, these exposures are reported as taxonomy-eligible, not taxonomy-aligned, in accordance with Article 8 of Regulation (EU) 2020/852.

In fiscal year 2025, the taxonomy eligibility ratio for household exposures continued to increase, reaching 38.25%. For exposures secured by real estate, this ratio stood at 82%, while retail vehicle financing is close to 37%. The data published in last year's report did not include non-EU exposures in the eligibility calculation. For comparison purposes, in response to question 51 of the third Commission Communication (C/2024/6691), the bank recalculated these ratios and marked the revised data (\*) in its T-1 tables.

The consistent upward trend across all categories reflects both the impact of expanded coverage and continued progress toward the objectives set out in the Bank's ESG strategy.

The Tables 1–5 to be disclosed by credit institutions pursuant to Article 8 of the Taxonomy Regulation, as published in Annex VI of Commission Delegated Regulation (EU) 2021/2178, are presented below.

Taking into account the provisions set out in the draft guidance published by the Commission on 17 December 2025 (Draft Commission Notice / FAQs) — in particular the answer to Question 3 — the Bank does not disclose, in its disclosures for the 2025 financial year under Regulation (EU) 2020/852, data relating to the KPI associated with the trading book, nor the KPI related to fee and commission income.

According to the above-mentioned guidance, the reporting obligation for these key performance indicators has been deferred until 1 January 2028. Consequently, the KPIs defined in Sections 1.2.3 and 1.2.4 of Annex V to the disclosure-related delegated act are not required to be reported in 2026, even where the credit institution opts to apply the reporting rules of the disclosure-related delegated act applicable until 31 December 2025. In the preparation of the report, the Bank fully complies with all relevant statutory requirements, and the deviation does not impact the fulfilment of its other disclosure obligations pursuant to the EU Taxonomy Regulation.

**The separate report published by the OTP Fund Manager and the tables indicated in Annex XII of Regulation 2021/2178 are presented under a separate sub-heading.**

## General qualitative information on the content and methodology of KPIs published in Annex XI of Regulation No. 2021/2178:

The scope of assets and activities covered by the KPIs:

### Asset portfolio covered

The calculation of the green asset ratio (GAR) for on-balance sheet exposures shall cover the following accounting categories of financial assets, including loans and advances, debt securities, equity holdings and repossessed collaterals:

- financial assets at amortised cost;
- financial assets at fair value through other comprehensive income;
- investments in subsidiaries;
- joint ventures and associates;
- financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss;
- real estate collaterals obtained by credit institutions by taking possession in exchange for the cancellation of debts.

In accordance with Article 7(1) of Regulation No. 2021/2178, exposures to central governments, central banks and supranational issuers shall be excluded from the calculation of the numerator and denominator of key performance indicators of financial undertakings.

Pursuant to Article 7 of Regulation No. 2021/2178, the following assets are excluded from the numerator of the GAR:

- financial assets held for trading;
- on-demand interbank loans;
- (c) exposures to undertakings that are not obliged to publish non-financial information pursuant to Article 19a or 29a of Directive No. 2013/34/EU;
- derivatives;
- cash and cash-related assets;
- other categories of assets (e.g. goodwill, goods, etc.).

Based on the guidance in Annex III of EU Regulation No. 2021/2178, gross exposures have been aggregated in the relevant row of Template 1 of the GAR for credit institutions based on the separate report of OTP Fund Management. Exposures on assets under management are shown on a consolidated basis in the asset GAR indicator in summary template 0, based on data on the total assets of the Fund Manager.

Financial data are identified based on the Bank's analytical credit and risk database and FINREP balance sheet data. In respect of alignment with the taxonomy, data were generated through individual data requests or from publicly available data.

## Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '0'

The use of CAPEX and turnover-based reporting has necessitated the duplication of KPI cells.

The definition of the KPIs shall be based on the following components:

- a) the numerator, which shall cover the loans and advances, debt securities, equities and repossessed collaterals, financing Taxonomy-aligned economic activities based on turnover KPI and CapEx KPI of underlying assets.
- b) the denominator, which shall cover the total loans and advances, total debt securities, total equities and total repossessed collaterals and all other covered on-balance sheet assets.

## Findings concerning Annex VI of Regulation No. 2021/2178, Template 1

The template has been duplicated on the basis of counterparty turnover and CapEx data. The numerators of the two GAR KPIs differ for (general) loans for unknown purpose, bond exposure and equity holdings to non-financial undertakings.

Exposures were analysed along the following customer segmentation:

- financial undertakings
- non-financial undertakings
- retail customers (with the following sub-categories: residential property, home renovation and car loans)
- local governments (only with the following sub-category: housing financing) – rental housing financing or known green loan purpose
- collateral obtained by taking possession, residential and commercial real estate

Tables T-1 are filled in using the latest version of the data as at 31.12.2024, where available.




### Information on financial undertakings

The collection of data on the taxonomy reports of financial enterprises was carried out taking into account the latest available data. Pursuant to the financial materiality threshold, exposures that did not reach 0.02% of the portfolio's size in terms of taxonomy evaluation were not taken into account. When collecting and processing the taxonomy reports, the Bank made all reasonable efforts in order to ensure portfolio coverage is as comprehensive as possible.

### Information on non-financial undertakings

The scope of clients covered by the Non-Financial Reporting Directive (NFRD, now CSRD) has been identified for each subsidiary bank, taking into account local regulations.

Filtering criteria (Hungary):

Based on Accounting Act C./2000: in the two consecutive business years preceding the business year, on the balance sheet date, any two of the following three indicators exceeded the following limit:	
 Number of employees	> 250 persons
 Total assets	> HUF 10 billion
 Annual net sales revenue	> HUF 20 billion

For the application of the above filtering criteria, data compiled by an external data provider and existing in the banking systems were used.

Loans and debt securities exposures to non-financial undertakings were taken into account on the basis of known and unknown loan purposes. In the case of known loan purposes, transactions that have been designated on the basis of the Bank's eligibility and alignment checks have been taken into account. In the case of unknown loan purposes and for equity exposures, the counterparty's disclosed turnover and CAPEX eligibility and alignment information has been taken into account.

If no published and reliable information was available for the counterparty concerned, the Bank did not take into account the counterparty's exposures for the purposes of eligibility and alignment in the course of reporting.

We have made every reasonable effort to identify the NFRD (CSRD)-obliged companies that appear in the parent company consolidation. At the same time, in the absence of up-to-date, comprehensive data provided by a public authority or a market operator, it is conceivable that not all of our NFRD (CSRD)-obligated customers have been identified. The Bank's short-term plans include the full, up-to-date identification of the non-financial partners involved in the GAR report and the integration of the required data into the bank's IT systems.

Loans and advances belonging to the specialized financing segment that can be identified in the controlling system are examined for the special lending category. In the case of bond exposures, the debt securities invested in project financing exposures were examined.

*Information on households*

GAR for retail exposures to residential real estate or house renovation loans was calculated as a proportion of loans to households collateralised by residential immovable property or granted for house renovation purposes that is Taxonomy-aligned in accordance with the relevant technical screening criteria for buildings, in particular renovation and acquisition and ownership in accordance with Annex I and Sections 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, and 7.7 respectively of Annex II to Delegated Regulation (EU) No. 2021/2139 or Sections 3.1 and 3.2 of Annex II to Delegated Regulation (EU) No. 2023/2486, compared to total loans to households collateralised by residential immovable property or granted for house renovation purposes. Since compliance with DNSH and Minimum Safeguards cannot currently be demonstrated due to data limitations, these exposures are reported as taxonomy-eligible, not taxonomy-aligned, in accordance with Article 8 of Regulation (EU) 2020/852.

According to the Bank's interpretation, based on EU Regulation 2021/2178, gross exposure to households means the Bank's exposure to all households, not just loans secured by residential real estate. The taxonomic examination can be interpreted in the case of exposures secured by residential real estate, loans secured by non-residential real estate are excluded during the taxonomic examination.

In line with the spirit of the legal interpretation, in order to avoid duplication of exposures, the Bank has decided to show exposures related to building modernization as defined in Section 7.2 of Annex I of the Delegated Act only in row 28 of Template and to exclude these exposures from loans collateralized by residential immovable property.

GAR for consumer credit exposures for car loans shall be calculated as the proportion of loans financing cars complying with the technical screening criteria as laid down in Section 6.5 of Annex I to Climate Delegated Act. This GAR includes disclosures related to transition activities, as well as the disclosure of loan portfolios for loans granted only after the start date of the application of Regulation EU 2021/2178, as well as the publication of flow of loans. Given that the Bank is currently unable to verify DNSH compliance in the case of residential exposures, the Bank does not display data related to taxonomy-aligned residential real estate financing for 2025.

*Information on local governments financing*

The Bank was unable to identify any exposure to rental housing financing beyond any doubt, so the fields in this category do not contain any data.

Based on the interpretation of the relevant legislation, all exposures that are not related to rental housing financing or known green lending purposes must be excluded from both the numerator and denominator of the GAR.

**Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '2'**

The Bank's interpretation is that column (a) of the template should contain – in a breakdown by 4-digit NACE code – the core activities of all the Bank's counterparties that fall within the scope of the NFRD.

The table contains exposures that are eligible and aligned to EU Taxonomy, per the given NACE code.

**Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '3'**

In this template, the Bank has disclosed the GAR KPI for the loan portfolio, which have been calculated for the covered assets on the basis of the data reported in template 1, using the formulae provided in the template published by the Commission.

The Bank has duplicated this template for turnover-based and CapEx-based disclosures.

**Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '4'**

The Bank has duplicated this template for turnover-based and CapEx-based disclosures. In disclosing information on changes in portfolio, the Bank has reported exposures incurred in the current year.

**Findings concerning Annex VI of Regulation No. 2021/2178, worksheet '5'**

In the calculation of the KPIs for off-balance sheet exposures (financial guarantees and assets under management), the Bank has used the data on covered assets provided in Table 1 and the formulas suggested in this table. Exposures for which information was not available in the Bank's systems are not considered and disclosed in this report.

Where the value of a cell is zero, the respective cell remains blank.

## 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environmentally sustainable assets [turnover based], HUF million	Total environmentally sustainable assets [CapEx based], HUF million	KPI <sup>1</sup>	KPI <sup>2</sup>	% coverage (over total assets) <sup>3</sup>	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
<b>Main KPI</b>	<b>Green asset ratio (GAR) stock</b>	112,266	165,636	0.36%	0.53%	67.17%	24.27%	32.83%
		Total environmentally sustainable activities [turnover based], HUF million	Total environmentally sustainable activities [CapEx based], HUF million	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
<i>Additional KPIs</i>	<i>GAR (flow)</i>	68,550	101,139	0.63%	0.93%	67.91%	22.19%	32.09%
	<i>Financial guarantees</i>	1,616	2,487	0.48%	0.74%			
	<i>Assets under management</i>	48,678	76,680	0.99%	1.55%			

<sup>1</sup> based on the Turnover KPI of the counterparty

<sup>2</sup> based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

<sup>3</sup> % of assets covered by the KPI over banks' total assets

## 1. Assets for the calculation of GAR – Turnover based data

Disclosure reference date 31 December 2025 (Turnover based)													
million HUF	Total [gross] carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)					
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>													
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	20,030,822	6,546,979	110,555	8,822	19,667	56,365	23,889	24	4	199	111	5
2	<b>Financial undertakings</b>	2,406,410	238,865	19,278	7,007	1,178	2,980	3,437	23	4	51	6	
3	Credit institutions	1,595,815	216,884	17,480	6,814	1,089	1,554	3,431	23	4	51	6	
4	Loans and advances	1,096,162	107,822	9,439	2,671	343	888	705	2	0	32	0	
5	Debt securities, including UoP	482,578	106,720	7,881	4,144	686	577	2,727	21	4	13	5	
6	Equity instruments	17,076	2,342	160		60	89				5		
7	Other financial corporations	810,594	21,981	1,798	193	89	1,426	6	0		0	0	
8	of which investment firms	18,689											
9	Loans and advances	9,264											
10	Debt securities, including UoP	9,424											
11	Equity instruments	0											
12	of which management companies	33,510											
13	Loans and advances	36											
14	Debt securities, including UoP												
15	Equity instruments	33,474											
16	of which insurance undertakings	4,698											
17	Loans and advances	4,275											
18	Debt securities, including UoP												
19	Equity instruments	423											
20	<b>Non-financial undertakings</b>	1,761,478	240,378	91,277	1,815	18,490	53,385	20,452	0		148	105	5
21	Loans and advances	1,572,444	208,174	81,467	1,815	17,866	47,785	7,763	0		135	105	5
22	Debt securities, including UoP	188,951	32,124	9,728		623	5,519	12,689			13		
23	Equity instruments	83	81	81			81						
24	<b>Households</b>	15,862,934	6,067,735										
25	of which loans collateralised by residential immovable property	6,707,491	5,504,114										
26	of which building renovation loans	160,684	160,684										
27	of which motor vehicle loans	1,089,404	402,937										
28	<b>Local governments financing</b>												
29	Housing financing												
30	Other local government financing												
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	14,699	14,699										
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	11,338,730											
33	<b>Financial and Non-financial undertakings</b>	8,891,558											
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,006,595											
35	Loans and advances	5,811,051											
36	of which loans collateralised by commercial immovable property												
37	of which building renovation loans												

		Disclosure reference date 31 December 2025 (Turnover based)													
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
million HUF	Total [gross] carrying amount	Of which Use of Proceeds	Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Use of Proceeds	Of which enabling	Of which Use of Proceeds	Use of Proceeds	Of which enabling	Of which Use of Proceeds	Use of Proceeds	Of which enabling	
38	Debt securities	194,722													
39	Equity instruments	821													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,884,963													
41	Loans and advances	2,866,236													
42	Debt securities	15,698													
43	Equity instruments	3,028													
44	<b>Derivatives</b>	29,661													
45	<b>On demand interbank loans</b>	147,330													
46	<b>Cash and cash-related assets</b>	622,124													
47	<b>Other categories of assets (e.g. Goodwill, commodities etc.)</b>	1,648,057													
48	<b>Total GAR assets</b>	31,384,250	6,561,677	110,555	8,822	19,667	56,365	23,889	24	0	4	199	111	0	
49	<b>Assets not covered for GAR calculation</b>	15,335,911													
50	<b>Central governments and Supranational issuers</b>	9,290,046													
51	<b>Central banks exposure</b>	5,728,758													
52	<b>Trading book</b>	317,107													
53	<b>Total assets</b>	46,720,161	6,561,677	110,555	8,822	19,667	56,365	23,889	24	0	4	199	111	0	
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>															
54	Financial guarantees	334,092	32,441	1,615	9	3	284	2,226	0			0	0		
55	Assets under management	4,933,845	183,312	44,167		4,996	26,637	7,938	3,340		2,912	68	18	0	
56	Of which debt securities	3,217,151	76,949	17,948		2,772	10,864	4,525	2,731		2,701	23	7		
57	Of which equity instruments	892,663	106,363	26,220		2,224	15,773	3,413	609		211	44	11	0	

million HUF		Disclosure reference date 31 December 2025 (Turnover based)															
		Circular economy (CE)					Pollution (PPC)			Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Total [gross] carrying amount	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
Use of Proceeds	Of which enabling		Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>																	
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	20,030,822	16,053	572	0	173	12,105	1,004	0	529	22,285	0	6,621,509	112,266	8,822	19,667	57,076
2	<b>Financial undertakings</b>	2,406,410	3,289	185		157	1,045	529		529	262		246,950	20,022	7,007	1,178	3,669
3	Credit institutions	1,595,815	637	13			292			259			221,554	17,521	6,814	1,089	1,558
4	Loans and advances	1,096,162	283	1			216			191			109,249	9,442	2,671	343	888
5	Debt securities, including UoP	482,578	354	12			76			68			109,959	7,919	4,144	686	581
6	Equity instruments	17,076											2,347	160		60	89
7	Other financial corporations	810,594	2,652	172	0	157	754	529	0	529	3	0	25,395	2,500	193	89	2,112
8	of which investment firms	18,689															
9	Loans and advances	9,264															
10	Debt securities, including UoP	9,424															
11	Equity instruments	0															
12	of which management companies	33,510															
13	Loans and advances	36															
14	Debt securities, including UoP																
15	Equity instruments	33,474															
16	of which insurance undertakings	4,698															
17	Loans and advances	4,275															
18	Debt securities, including UoP																
19	Equity instruments	423															
20	<b>Non-financial undertakings</b>	1,761,478	12,764	387		16	11,060	475		22,023			306,824	92,244	1,815	18,490	53,406
21	Loans and advances	1,572,444	9,698	312		16	7,686	475		21,127			254,582	82,360	1,815	17,866	47,806
22	Debt securities, including UoP	188,951	3,066	75			3,374			896			52,162	9,803	623	5,519	
23	Equity instruments	83											81	81			81
24	<b>Households</b>	15,862,934											6,067,735				
25	of which loans collateralised by residential immovable property	6,707,491											5,504,114				
26	of which building renovation loans	160,684											160,684				
27	of which motor vehicle loans	1,089,404											402,937				
28	<b>Local governments financing</b>																
29	Housing financing																
30	Other local government financing																
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	14,699											14,699				
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	11,338,730															
33	<b>Financial and Non-financial undertakings</b>	8,891,558															
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,006,595															
35	Loans and advances	5,811,051															
36	of which loans collateralised by commercial immovable property																
37	of which building renovation loans																

		Disclosure reference date 31 December 2025 (Turnover based)																	
		Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)								
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)								
million HUF		Total [gross] carrying amount	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which transitional	Of which enabling						
38	Debt securities	194,722																	
39	Equity instruments	821																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,884,963																	
41	Loans and advances	2,866,236																	
42	Debt securities	15,698																	
43	Equity instruments	3,028																	
44	Derivatives	29,661																	
45	On demand interbank loans	147,330																	
46	Cash and cash-related assets	622,124																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)	1,648,057																	
48	<b>Total GAR assets</b>	<b>31,384,250</b>	<b>16,053</b>	<b>572</b>	<b>0</b>	<b>173</b>	<b>12,105</b>	<b>1,004</b>	<b>0</b>	<b>529</b>	<b>22,285</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,636,208</b>	<b>112,266</b>	<b>8,822</b>	<b>19,667</b>	<b>57,076</b>
49	<b>Assets not covered for GAR calculation</b>	<b>15,335,911</b>																	
50	Central governments and Supranational issuers	9,290,046																	
51	Central banks exposure	5,728,758																	
52	Trading book	317,107																	
53	<b>Total assets</b>	<b>46,720,161</b>	<b>16,053</b>	<b>572</b>	<b>0</b>	<b>173</b>	<b>12,105</b>	<b>1,004</b>	<b>0</b>	<b>529</b>	<b>22,285</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,636,208</b>	<b>112,266</b>	<b>8,822</b>	<b>19,667</b>	<b>57,076</b>

million HUF		Disclosure reference date 31 December 2025 (Turnover based)										
		Circular economy (CE)			Pollution (PPC)		Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Total [gross] carrying amount	Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		
	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which transitional	Of which enabling	
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>												
54	Financial guarantees	334,092	1,635	0	115	0	190	36,607	1,616	9	3	284
55	Assets under management	4,933,845	19,602	1,128	369	11,844	24	4,608	227,373	48,678	4,996	29,918
56	Of which debt securities	3,217,151	4,721	183	139	169	2	463	86,851	20,869	2,772	13,703
57	Of which equity instruments	892,663	14,874	946	230	11,675	23	4,145	140,515	27,809	2,224	16,214

## 1. Assets for the calculation of GAR – Turnover based data (T-1)

Disclosure reference date 31 December 2024 (Turnover based)											
million HUF	Total [gross] carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	16,727,599	5,031,080*	30,345	776	7,922	12,245	719	18	0	887
2	<b>Financial undertakings</b>	2,157,696	53,932	2,208	776	401	430	84	18	0	
3	Credit institutions	1,724,030	50,227	2,123	724	379	423	60	13	0	
4	Loans and advances	1,145,822	50,227	2,123	724	379	423	60	13	0	
5	Debt securities, including UoP	578,186									
6	Equity instruments	22									
7	Other financial corporations	433,666	3,706	85	52	22	6	23	5		
8	of which investment firms	1,934									
9	Loans and advances	1,934									
10	Debt securities, including UoP	0									
11	Equity instruments	0									
12	of which management companies	6,625									
13	Loans and advances										
14	Debt securities, including UoP										
15	Equity instruments	6,625									
16	of which insurance undertakings	1,966									
17	Loans and advances	1,669									
18	Debt securities, including UoP										
19	Equity instruments	297									
20	<b>Non-financial undertakings</b>	877,837	74,200	28,137		7,521	11,816	635	0	0	887
21	Loans and advances	859,587	71,778	27,662		7,432	11,816	259	0	0	887
22	Debt securities, including UoP	18,159	2,332	386				376			
23	Equity instruments	91	90			90					
24	<b>Households</b>	13,692,065	4,902,947*								
25	of which loans collateralised by residential immovable property	6,014,461	4,406,279*								
26	of which building renovation loans	127,700	127,700*								
27	of which motor vehicle loans	743,909	368,969*								
28	<b>Local governments financing</b>										
29	Housing financing										
30	Other local government financing										

		Disclosure reference date 31 December 2024 (Turnover based)											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
million HUF	Total [gross] carrying amount	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling
31	Collateral obtained by taking possession: residential and commercial immovable properties	16,115											
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	12,303,916											
33	<b>Financial and Non-financial undertakings</b>	9,719,235											
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346											
35	Loans and advances	6,561,296											
36	of which loans collateralised by commercial immovable property												
37	of which building renovation loans												
38	Debt securities	306,914											
39	Equity instruments	67,136											
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889											
41	Loans and advances	2,767,099											
42	Debt securities	14,052											
43	Equity instruments	2,737											
44	<b>Derivatives</b>	50,334											
45	<b>On demand interbank loans</b>	379,446											
46	<b>Cash and cash-related assets</b>	667,872											
47	<b>Other categories of assets (e.g. Goodwill, commodities etc.)</b>	1,487,029											
48	<b>Total GAR assets</b>	29,047,630	5,031,080*	30,345	776	7,922	12,245	719	18	0	0	887	0
49	<b>Assets not covered for GAR calculation</b>	15,804,501											
50	Central governments and Supranational issuers	8,149,592											
51	Central banks exposure	7,012,747											
52	Trading book	642,162											
53	<b>Total assets</b>	44,852,131	5,031,080*	30,345	776	7,922	12,245	719	18	0	0	887	0
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>													
54	Financial guarantees	7,206											
55	Assets under management**	4,602,408	85,180	22,403		1,738	14,742	4,565	1,514		1,489	129	20
56	Of which debt securities**	1,779,041	30,572	3,416		466	1,964	1,193	1,193		1,184	5	2
57	Of which equity instruments**	792,238	54,608	18,987		1,272	12,778	3,372	321		305	124	18

million HUF		Disclosure reference date 31 December 2024 (Turnover based)												
		Circular economy (CE)			Pollution (PPC)		Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Total [gross] carrying amount	Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	16,727,599	569	2	0	5,767	0	17,065	0	5,056,087*	30,365	776	7,922	12,245
2	<b>Financial undertakings</b>	2,157,696	108							54,124	2,226	776	401	430
3	Credit institutions	1,724,030								50,287	2,136	724	379	423
4	Loans and advances	1,145,822								50,287	2,136	724	379	423
5	Debt securities, including UoP	578,186												
6	Equity instruments	22												
7	Other financial corporations	433,666	108		0		0		0	3,837	90	52	22	6
8	of which investment firms	1,934												
9	Loans and advances	1,934												
10	Debt securities, including UoP	0												
11	Equity instruments	0												
12	of which management companies	6,625												
13	Loans and advances													
14	Debt securities, including UoP													
15	Equity instruments	6,625												
16	of which insurance undertakings	1,966												
17	Loans and advances	1,669												
18	Debt securities, including UoP													
19	Equity instruments	297												
20	<b>Non-financial undertakings</b>	877,837	461	2		5,767		17,065		99,015	28,139		7,521	11,816
21	Loans and advances	859,587	461	2		5,767		17,065		96,217	27,663		7,432	11,816
22	Debt securities, including UoP	18,159								2,708	386			
23	Equity instruments	91								90	90		90	
24	<b>Households</b>	13,692,065								4,902,947*				
25	of which loans collateralised by residential immovable property	6,014,461								4,406,279*				
26	of which building renovation loans	127,700								127,700*				
27	of which motor vehicle loans	743,909								368,969*				
28	<b>Local governments financing</b>													
29	Housing financing													
30	Other local government financing													
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	16,115												
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	12,303,916												
33	<b>Financial and Non-financial undertakings</b>	9,719,235												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346												
35	Loans and advances	6,561,296												
36	of which loans collateralised by commercial immovable property													
37	of which building renovation loans													

		Disclosure reference date 31 December 2024 (Turnover based)																	
		Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)								
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)								
million HUF		Use of Proceeds		Of which enabling	Use of Proceeds		Of which enabling	Use of Proceeds		Of which enabling	Use of Proceeds		Of which transitional	Of which enabling					
Total [gross] carrying amount																			
38	Debt securities	306,914																	
39	Equity instruments	67,136																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889																	
41	Loans and advances	2,767,099																	
42	Debt securities	14,052																	
43	Equity instruments	2,737																	
44	Derivatives	50,334																	
45	On demand interbank loans	379,446																	
46	Cash and cash-related assets	667,872																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)	1,487,029																	
48	<b>Total GAR assets</b>	29,047,630	569	2	0	0	5,767	0	0	0	17,065	0	0	0	5,056,087*	30,365	776	7,922	12,245
49	<b>Assets not covered for GAR calculation</b>	15,804,501																	
50	Central governments and Supranational issuers	8,149,592																	
51	Central banks exposure	7,012,747																	
52	Trading book	642,162																	
53	<b>Total assets</b>	44,852,131	569	2			5,767				17,065				5,056,087*	30,365	776	7,922	12,245

		Disclosure reference date 31 December 2024 (Turnover based)											
		Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Total [gross] carrying amount	Of which environmentally sustainable (Taxonomy-aligned)		Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)
Use of Proceeds	Of which enabling		Use of Proceeds	Of which enabling									Use of Proceeds
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>													
54	Financial guarantees	7,206											
55	Assets under management**	4,602,408	8,683	790	261	8,317	23		1,898				
56	Of which debt securities**	1,779,041	5	3									
57	Of which equity instruments**	792,238	8,678	787	261	8,317	23		1,898				

\*The data marked with an \* in the table have been recalculated, as non-EU household exposures have been included in the GAR report.

\*\*\*The EU Taxonomy tables of OTP Fund Management will be restated for the year 2024 due to corrections in client data previously utilized. In line with this, the corresponding rows of the EU Taxonomy tables relating to the off-balance sheet exposures of OTP Bank Plc. will also be restated.

## 2. GAR sector information – Turnover based data

Breakdown by sector - NACE 4 digits level (code and label)		Disclosure reference date 31 December 2025 (Turnover based)											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount	Of which environmentally sustainable (CCM)	[Gross] carrying amount	Of which environmentally sustainable (CCM)	[Gross] carrying amount	Of which environmentally sustainable (CCA)	[Gross] carrying amount	Of which environmentally sustainable (CCA)	[Gross] carrying amount	Of which environmentally sustainable (WTR)	[Gross] carrying amount	Of which environmentally sustainable (WTR)
million HUF	million HUF	million HUF	million HUF	million HUF	million HUF	million HUF	million HUF	million HUF	million HUF	million HUF	million HUF		
1	0150-Mixed farming	1											
2	0510-Mining of hard coal	2,384	2,069										
3	0893-Extraction of salt	0											
4	0910-Support activities for petroleum and natural gas extraction	0	0										
5	1039-Other processing and preserving of fruit and vegetables	55											
6	1062-Manufacture of starches and starch products	2,358	2,038										
7	1071-Manufacture of bread; manufacture of fresh pastry goods and cakes	14											
8	1082-Manufacture of cocoa, chocolate and sugar confectionery	27											
9	1086-Manufacture of homogenised food preparations and dietetic food	0											
10	1812-Other printing	0	0										
11	1920-Manufacture of refined petroleum products	1,549	26										
12	2011-Manufacture of industrial gases	25,540	3,380										
13	2014-Manufacture of other organic basic chemicals	93	9										
14	2016-Manufacture of plastics in primary forms	0	0										
15	2110-Manufacture of basic pharmaceutical products												
16	2120-Manufacture of pharmaceutical preparations	1,417			1								
17	2219-Manufacture of other rubber products	1,993											
18	2221-Manufacture of plastic plates, sheets, tubes and profiles	1,393											
19	2229-Manufacture of other plastic products	5											
20	2361-Manufacture of concrete products for construction purposes	12											
21	2399-Manufacture of other non-metallic mineral products n.e.c.	82											
22	2410-Manufacture of basic iron and steel and of ferro-alloys	15,170											
23	2434-Cold drawing of wire	7											
24	2442-Aluminium production	5,558	889										
25	2443-Lead, zinc and tin production	25											
26	2511-Manufacture of metal structures and parts of structures	2,582			87								
27	2530-Manufacture of steam generators, except central heating hot water boilers	1	1										
28	2550-Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0	0										
29	2592-Manufacture of light metal packaging	1											
30	2611-Manufacture of electronic components	66											
31	2620-Manufacture of computers and peripheral equipment	2											
32	2711-Manufacture of electric motors, generators and transformers	5,683			401								
33	2720-Manufacture of batteries and accumulators	2,278	2,218										
34	2740-Manufacture of electric lighting equipment	2,708	446										
35	2891-Manufacture of machinery for metallurgy	235											
36	2910-Manufacture of motor vehicles	2,207	144										
37	2920-Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	700	156										
38	2932-Manufacture of other parts and accessories for motor vehicles	16	10										
39	3020-Manufacture of railway locomotives and rolling stock	1	0										
40	3101-Manufacture of office and shop furniture	13											
41	3312-Repair of machinery	1	1										
42	3511-Production of electricity	22,537	22,302		0				0	0			

Disclosure reference date 31 December 2025 (Turnover based)														
Breakdown by sector - NACE 4 digits level (code and label)														
Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)				Water and marine resources (WTR)							
Non-Financial corporates (Subject to NFRD)			SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)			SMEs and other NFC not subject to NFRD		
[Gross] carrying amount Of which environmentally sustainable (CCM)			[Gross] carrying amount Of which environmentally sustainable (CCM)		[Gross] carrying amount Of which environmentally sustainable (CCA)		[Gross] carrying amount Of which environmentally sustainable (CCA)		[Gross] carrying amount Of which environmentally sustainable (WTR)			[Gross] carrying amount Of which environmentally sustainable (WTR)		
million HUF			million HUF		million HUF		million HUF		million HUF			million HUF		
43	3512-Transmission of electricity	7,361	321											
44	3513-Distribution of electricity	8,715	8,715											
45	3514-Trade of electricity	1	1											
46	3522-Distribution of gaseous fuels through mains	2,603	832							13				
47	3523-Trade of gas through mains	5,071	4,118				13			51				
48	3530-Steam and air conditioning supply	6,920	0				4			0			0	
49	3600-Water collection, treatment and supply	4,035					3							
50	3811-Collection of non-hazardous waste	1,000	7				598							
51	4120-Construction of residential and non-residential buildings	1,017	0				0							
52	4211-Construction of roads and motorways	384	0				5,927							
53	4212-Construction of railways and underground railways	383	0							0				
54	4221-Construction of utility projects for fluids	0	0				0			0			0	
55	4299-Construction of other civil engineering projects n.e.c.	0	0							0				
56	4511-Sale of cars and light motor vehicles	796	70											
57	4531-Wholesale trade of motor vehicle parts and accessories	65												
58	4618-Agents specialised in the sale of other particular products	6												
59	4619-Agents involved in the sale of a variety of goods	0												
60	4631-Wholesale of fruit and vegetables	145												
61	4646-Wholesale of pharmaceutical goods	872												
62	4671-Wholesale of solid, liquid and gaseous fuels and related products	1,429	1,014				14			54			54	
63	4672-Wholesale of metals and metal ores	22												
64	4673-Wholesale of wood, construction materials and sanitary equipment	0	0											
65	4675-Wholesale of chemical products	60												
66	4690-Non-specialised wholesale trade	697	33											
67	4711-Retail sale in non-specialised stores with food, beverages or tobacco predominating	8	1				0	0						
68	4719-Other retail sale in non-specialised stores	19												
69	4730-Retail sale of automotive fuel in specialised stores	282	5											
70	4754-Retail sale of electrical household appliances in specialised stores													
71	4773-Dispensing chemist in specialised stores	0					0							
72	4920-Freight rail transport	1,572												
73	4931-Urban and suburban passenger land transport	5,686					1							
74	4941-Freight transport by road	2,075					108							
75	4950-Transport via pipeline	4,631	3,135											
76	5110-Passenger air transport	0	0											
77	5229-Other transportation support activities	0	0											
78	5310-Postal activities under universal service obligation	1	0											
79	5510-Hotels and similar accommodation	6,405	1,933				4			30				
80	5610-Restaurants and mobile food service activities													
81	6110-Wired telecommunications activities	309	4				1,187							
82	6120-Wireless telecommunications activities	25												
83	6190-Other telecommunications activities	20	2											
84	6201-Computer programming activities	389	389				14							
85	6203-Computer facilities management activities	2												
86	6209-Other information technology and computer service activities	17	0											
87	6312-Web portals	0												
88	6420-Activities of holding companies	16,273	14,951				0							
89	6492-Other credit granting	0	0											

Disclosure reference date 31 December 2025 (Turnover based)												
Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million HUF	Of which environmentally sustainable (CCM)	million HUF	Of which environmentally sustainable (CCM)	million HUF	Of which environmentally sustainable (CCA)	million HUF	Of which environmentally sustainable (CCA)	million HUF	Of which environmentally sustainable (WTR)	million HUF	Of which environmentally sustainable (WTR)
90	6512-Non-life insurance				1							
91	6810-Buying and selling of own real estate	15,731	1,102									
92	6820-Renting and operating of own or leased real estate	21	0									
93	7010-Activities of head offices	34,446	20,456									
94	7022-Business and other management consultancy activities	65	0		12,090							
95	7112-Engineering activities and related technical consultancy	0	0		0							
96	7120-Technical testing and analysis	0										
97	7711-Renting and leasing of cars and light motor vehicles	13,972	491									
98	8121-General cleaning of buildings	0			0							
99	8220-Activities of call centres	4	4									
100	8299-Other business support service activities n.e.c.	11	1		0							
101	9200-Gambling and betting activities											
102	9311-Operation of sports facilities											
103	9601-Washing and (dry-)cleaning of textile and fur products	0										
104	9604-Activities of physical well-being institutes	119										

Disclosure reference date 31 December 2025 (Turnover based)																
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1 0150-Mixed farming													1			
2 0510-Mining of hard coal													2,384	2,069		
3 0893-Extraction of salt													0			
4 0910-Support activities for petroleum and natural gas extraction													0	0		
5 1039-Other processing and preserving of fruit and vegetables	8			1,404									1,467			
6 1062-Manufacture of starches and starch products													2,358	2,038		
7 1071-Manufacture of bread; manufacture of fresh pastry goods and cakes													14			
8 1082-Manufacture of cocoa, chocolate and sugar confectionery	7							2					35			
9 1086-Manufacture of homogenised food preparations and dietetic food	0												0			
10 1812-Other printing													0	0		
11 1920-Manufacture of refined petroleum products	487	61											2,036	87		
12 2011-Manufacture of industrial gases													25,540	3,380		
13 2014-Manufacture of other organic basic chemicals				3									96	9		
14 2016-Manufacture of plastics in primary forms	0	0											0	0		
15 2110-Manufacture of basic pharmaceutical products				1,313									1,313			
16 2120-Manufacture of pharmaceutical preparations	0			3,317				1					4,736			
17 2219-Manufacture of other rubber products													1,993			
18 2221-Manufacture of plastic plates, sheets, tubes and profiles													1,393			
19 2229-Manufacture of other plastic products													5			
20 2361-Manufacture of concrete products for construction purposes													12			
21 2399-Manufacture of other non-metallic mineral products n.e.c.													82			
22 2410-Manufacture of basic iron and steel and of ferro-alloys													15,170			
23 2434-Cold drawing of wire													7			
24 2442-Aluminium production													5,558	889		
25 2443-Lead, zinc and tin production													25			
26 2511-Manufacture of metal structures and parts of structures	39												2,708			
27 2530-Manufacture of steam generators, except central heating hot water boilers	0												2	1		

Disclosure reference date 31 December 2025 (Turnover based)																
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
28	2550-Forging, pressing, stamping and roll-forming of metal; powder metallurgy			446	265							446	265			
29	2592-Manufacture of light metal packaging											1				
30	2611-Manufacture of electronic components											66				
31	2620-Manufacture of computers and peripheral equipment	20										22				
32	2711-Manufacture of electric motors, generators and transformers	180										6,264				
33	2720-Manufacture of batteries and accumulators											2,278	2,218			
34	2740-Manufacture of electric lighting equipment	37										2,745	446			
35	2891-Manufacture of machinery for metallurgy											235				
36	2910-Manufacture of motor vehicles											2,207	144			
37	2920-Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers											700	156			
38	2932-Manufacture of other parts and accessories for motor vehicles	0	0									16	10			
39	3020-Manufacture of railway locomotives and rolling stock	0	0									1	0			
40	3101-Manufacture of office and shop furniture											13				
41	3312-Repair of machinery											1	1			
42	3511-Production of electricity	0	0	0	0							22,537	22,302			
43	3512-Transmission of electricity											7,361	321			
44	3513-Distribution of electricity											8,715	8,715			
45	3514-Trade of electricity											1	1			
46	3522-Distribution of gaseous fuels through mains			13				294				2,922	832			
47	3523-Trade of gas through mains	51	28	143	89							5,328	4,287			
48	3530-Steam and air conditioning supply	0	0	0	0							6,925	0			
49	3600-Water collection, treatment and supply	0		0				0				4,038				
50	3811-Collection of non-hazardous waste	368	20	632				44				2,641	26			
51	4120-Construction of residential and non-residential buildings	0										1,017	0			
52	4211-Construction of roads and motorways	0										6,310	0			
53	4212-Construction of railways and underground railways			0				0				383	0			
54	4221-Construction of utility projects for fluids	0	0	0	0							0	0			

Disclosure reference date 31 December 2025 (Turnover based)														
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	[Gross] carrying amount
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
55	4299-Construction of other civil engineering projects n.e.c.			0				0				0	0	
56	4511-Sale of cars and light motor vehicles	453										1,250	70	
57	4531-Wholesale trade of motor vehicle parts and accessories											65		
58	4618-Agents specialised in the sale of other particular products											6		
59	4619-Agents involved in the sale of a variety of goods	0		0								0		
60	4631-Wholesale of fruit and vegetables											145		
61	4646-Wholesale of pharmaceutical goods			1,222								2,094		
62	4671-Wholesale of solid, liquid and gaseous fuels and related products	67	31	152	95							1,715	1,195	
63	4672-Wholesale of metals and metal ores											22		
64	4673-Wholesale of wood, construction materials and sanitary equipment											0	0	
65	4675-Wholesale of chemical products											60		
66	4690-Non-specialised wholesale trade	57	16	1								754	49	
67	4711-Retail sale in non-specialised stores with food, beverages or tobacco predominating											8	1	
68	4719-Other retail sale in non-specialised stores											19		
69	4730-Retail sale of automotive fuel in specialised stores											282	5	
70	4754-Retail sale of electrical household appliances in specialised stores	58										58		
71	4773-Dispensing chemist in specialised stores	0		0				0				1		
72	4920-Freight rail transport											1,572		
73	4931-Urban and suburban passenger land transport											5,687		
74	4941-Freight transport by road	82										2,265		
75	4950-Transport via pipeline	360	45									4,991	3,180	
76	5110-Passenger air transport											0	0	
77	5229-Other transportation support activities											0	0	
78	5310-Postal activities under universal service obligation											1	0	
79	5510-Hotels and similar accommodation			30				20,096				26,565	1,933	
80	5610-Restaurants and mobile food service activities			14								14		
81	6110-Wired telecommunications activities	40	12									1,536	16	

Disclosure reference date 31 December 2025 (Turnover based)																
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
82 6120-Wireless telecommunications activities	9												34			
83 6190-Other telecommunications activities	7	3											27	6		
84 6201-Computer programming activities	7												410	389		
85 6203-Computer facilities management activities	0												2			
86 6209-Other information technology and computer service activities	6												23	0		
87 6312-Web portals													0			
88 6420-Activities of holding companies	0												16,273	14,951		
89 6492-Other credit granting	0	0											0	0		
90 6512-Non-life insurance													1			
91 6810-Buying and selling of own real estate								559					16,291	1,102		
92 6820-Renting and operating of own or leased real estate	48												69	0		
93 7010-Activities of head offices	2,576				2,326								39,348	20,456		
94 7022-Business and other management consultancy activities	64												12,219	0		
95 7112-Engineering activities and related technical consultancy	0												0	0		
96 7120-Technical testing and analysis	0	0											0	0		
97 7711-Renting and leasing of cars and light motor vehicles	7,736	171											21,708	662		
98 8121-General cleaning of buildings	0				0					0			0			
99 8220-Activities of call centres													4	4		
100 8299-Other business support service activities n.e.c.	0												11	1		
101 9200-Gambling and betting activities										1,027			1,027			
102 9311-Operation of sports facilities					43	25							43	25		
103 9601-Washing and (dry-)cleaning of textile and fur products										0			0			
104 9604-Activities of physical well-being institutes													119			

3. GAR KPI Stock – Turnover based data

Disclosure reference date 31 December 2025 (Turnover based)												
% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which Use of Proceeds		Of which transitional enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	32.68%	0.55%	0.04%	0.10%	0.28%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%
2	<b>Financial undertakings</b>	9.93%	0.80%	0.29%	0.05%	0.12%	0.14%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	13.59%	1.10%	0.43%	0.07%	0.10%	0.22%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	9.84%	0.86%	0.24%	0.03%	0.08%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	22.11%	1.63%	0.86%	0.14%	0.12%	0.57%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	13.71%	0.94%		0.35%	0.52%			0.03%			
7	Other financial corporations	2.71%	0.22%	0.02%	0.01%	0.18%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms											
9	Loans and advances											
10	Debt securities, including UoP											
11	Equity instruments											
12	of which management companies											
13	Loans and advances											
14	Debt securities, including UoP											
15	Equity instruments											
16	of which insurance undertakings											
17	Loans and advances											
18	Debt securities, including UoP											
19	Equity instruments											
20	<b>Non-financial undertakings</b>	13.65%	5.18%	0.10%	1.05%	3.03%	1.16%	0.00%	0.01%	0.01%	0.01%	0.00%
21	Loans and advances	13.24%	5.18%	0.12%	1.14%	3.04%	0.49%	0.00%	0.01%	0.01%	0.01%	0.00%
22	Debt securities, including UoP	17.00%	5.15%		0.33%	2.92%	6.72%		0.01%			
23	Equity instruments	98.20%	98.20%			98.20%						
24	<b>Households</b>	38.25%										
25	of which loans collateralised by residential immovable property	82.06%										
26	of which building renovation loans	100.00%										
27	of which motor vehicle loans	36.99%										
28	<b>Local governments financing</b>											
29	Housing financing											
30	Other local government financing											
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100.00%										
32	<b>Total GAR assets</b>	20.91%	0.35%	0.03%	0.06%	0.18%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date 31 December 2025 (Turnover based)															
% (compared to total covered assets in the denominator)	Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.08%	0.00%	0.00%	0.06%	0.01%	0.00%	0.11%		33.06%	0.56%	0.04%	0.10%	0.28%	42.87%
2	<b>Financial undertakings</b>	0.14%	0.01%	0.01%	0.04%	0.02%	0.02%	0.01%		10.26%	0.83%	0.29%	0.05%	0.15%	5.15%
3	Credit institutions	0.04%	0.00%		0.02%		0.02%			13.88%	1.10%	0.43%	0.07%	0.10%	3.42%
4	Loans and advances	0.03%	0.00%		0.02%		0.02%			9.97%	0.86%	0.24%	0.03%	0.08%	2.35%
5	Debt securities, including UoP	0.07%	0.00%		0.02%		0.01%			22.79%	1.64%	0.86%	0.14%	0.12%	1.03%
6	Equity instruments									13.74%	0.94%		0.35%	0.52%	0.04%
7	Other financial corporations	0.33%	0.02%	0.02%	0.09%	0.07%	0.07%	0.00%		3.13%	0.31%	0.02%	0.01%	0.26%	1.73%
8	of which investment firms														0.04%
9	Loans and advances														0.02%
10	Debt securities, including UoP														0.02%
11	Equity instruments														0.00%
12	of which management companies														0.07%
13	Loans and advances														0.00%
14	Debt securities, including UoP														0.01%
15	Equity instruments														0.07%
16	of which insurance undertakings														0.01%
17	Loans and advances														0.01%
18	Debt securities, including UoP														
19	Equity instruments														0.00%
20	<b>Non-financial undertakings</b>	0.72%	0.02%	0.00%	0.63%	0.03%		1.25%		17.42%	5.24%	0.10%	1.05%	3.03%	3.77%
21	Loans and advances	0.62%	0.02%	0.00%	0.49%	0.03%		1.34%		16.19%	5.24%	0.12%	1.14%	3.04%	3.37%
22	Debt securities, including UoP	1.62%	0.04%		1.79%		0.47%			27.61%	5.19%		0.33%	2.92%	0.40%
23	Equity instruments									98.20%	98.20%			98.20%	0.00%
24	<b>Households</b>									38.25%					33.95%
25	of which loans collateralised by residential immovable property									82.06%					14.36%
26	of which building renovation loans									100.00%					0.34%
27	of which motor vehicle loans									36.99%					2.33%
28	<b>Local governments financing</b>														
29	Housing financing														
30	Other local government financing														
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>									100.00%					0.03%
32	<b>Total GAR assets</b>	0.05%	0.00%	0.00%	0.04%	0.00%	0.00%	0.07%		21.15%	0.36%	0.03%	0.06%	0.18%	67.17%

3. GAR KPI Stock – Turnover based data (T-1)

% (compared to total covered assets in the denominator)		Disclosure reference date 31 December 2024 (Turnover based)									
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	30.08%*	0.18%	0.00%	0.05%	0.07%	0.00%	0.00%	0.00%	0.01%	
2	<b>Financial undertakings</b>	2.50%	0.10%	0.04%	0.02%	0.02%	0.00%	0.00%	0.00%	0.00%	
3	Credit institutions	2.91%	0.12%	0.04%	0.02%	0.02%	0.00%	0.00%	0.00%	0.00%	
4	Loans and advances	4.38%	0.19%	0.06%	0.03%	0.04%	0.01%	0.00%	0.00%	0.00%	
5	Debt securities, including UoP										
6	Equity instruments										
7	Other financial corporations	0.85%	0.02%	0.01%	0.01%	0.00%	0.01%	0.00%	0.00%	0.00%	
8	of which investment firms										
9	Loans and advances										
10	Debt securities, including UoP										
11	Equity instruments										
12	of which management companies										
13	Loans and advances										
14	Debt securities, including UoP										
15	Equity instruments										
16	of which insurance undertakings										
17	Loans and advances										
18	Debt securities, including UoP										
19	Equity instruments										
20	<b>Non-financial undertakings</b>	8.45%	3.21%		0.86%	1.35%	0.07%	0.00%	0.00%	0.10%	
21	Loans and advances	8.35%	3.22%		0.86%	1.37%	0.03%	0.00%	0.00%	0.10%	
22	Debt securities, including UoP	12.84%	2.12%				2.07%				
23	Equity instruments	98.50%	98.50%		98.50%						
24	<b>Households</b>	35.81%*									
25	of which loans collateralised by residential immovable property	73.26%*									
26	of which building renovation loans	100.00%*									
27	of which motor vehicle loans	49.60%*									
28	<b>Local governments financing</b>										
29	Housing financing										
30	Other local government financing										
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>										
32	<b>Total GAR assets</b>	17.32%*	0.10%	0.00%	0.03%	0.04%	0.00%	0.00%	0.00%	0.00%	

Disclosure reference date 31 December 2024 (Turnover based)												
% (compared to total covered assets in the denominator)	Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which transitional	Of which enabling	Proportion of total assets covered	
<b>GAR - Covered assets in both numerator and denominator</b>												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation		0.00%	0.00%	0.03%	0.10%	30.23%*	0.18%	0.00%	0.05%	0.07%	37.29%
2	<b>Financial undertakings</b>		0.01%				2.51%	0.10%	0.04%	0.02%	0.02%	4.81%
3	Credit institutions						2.92%	0.12%	0.04%	0.02%	0.02%	3.84%
4	Loans and advances						4.39%	0.19%	0.06%	0.03%	0.04%	2.55%
5	Debt securities, including UoP											1.29%
6	Equity instruments											0.00%
7	Other financial corporations		0.02%				0.88%	0.02%	0.01%	0.01%	0.00%	0.97%
8	of which investment firms											0.00%
9	Loans and advances											0.00%
10	Debt securities, including UoP											
11	Equity instruments											0.00%
12	of which management companies											0.01%
13	Loans and advances											
14	Debt securities, including UoP											
15	Equity instruments											0.01%
16	of which insurance undertakings											0.00%
17	Loans and advances											0.00%
18	Debt securities, including UoP											
19	Equity instruments											0.00%
20	<b>Non-financial undertakings</b>		0.05%	0.00%	0.66%	1.94%	11.28%	3.21%	0.86%	1.35%	1.96%	
21	Loans and advances		0.05%	0.00%	0.67%	1.99%	11.19%	3.22%	0.86%	1.37%	1.92%	
22	Debt securities, including UoP						14.91%	2.12%				0.04%
23	Equity instruments						98.50%	98.50%	98.50%			0.00%
24	<b>Households</b>						35.81%*					30.53%
25	of which loans collateralised by residential immovable property						73.26%*					13.41%
26	of which building renovation loans						100.00%*					0.28%
27	of which motor vehicle loans						49.60%*					1.66%
28	<b>Local governments financing</b>											
29	Housing financing											
30	Other local government financing											
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>											0.04%
32	<b>Total GAR assets</b>		0.00%	0.00%	0.02%	0.06%	17.41%*	0.10%	0.00%	0.03%	0.04%	64.76%

\*The data marked with an \* in the table have been recalculated, as non-EU household exposures have been included in the GAR report.

4.GAR KPI Flow – Turnover based data

		Disclosure reference date 31 December 2025 (Turnover based)										
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)				
% (compared to flow of total eligible assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	26.47%	0.93%	0.01%	0.25%	0.49%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%
2	<b>Financial undertakings</b>	7.87%	0.67%	0.06%	0.02%	0.03%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	10.98%	1.00%	0.09%	0.03%	0.05%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	10.74%	1.00%	0.08%	0.03%	0.05%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	17.02%	0.92%	0.30%	0.03%	0.06%	0.01%	0.00%	0.00%			
6	Equity instruments											
7	Other financial corporations	1.68%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	
8	of which investment firms											
9	Loans and advances											
10	Debt securities, including UoP											
11	Equity instruments											
12	of which management companies											
13	Loans and advances											
14	Debt securities, including UoP											
15	Equity instruments											
16	of which insurance undertakings											
17	Loans and advances											
18	Debt securities, including UoP											
19	Equity instruments											
20	<b>Non-financial undertakings</b>	15.23%	7.85%		2.26%	4.52%	0.18%	0.00%		0.02%	0.01%	0.00%
21	Loans and advances	15.55%	8.00%		2.32%	4.63%	0.19%	0.00%		0.02%	0.01%	0.00%
22	Debt securities, including UoP	2.10%	2.06%									
23	Equity instruments											
24	<b>Households</b>	31.07%										
25	of which loans collateralised by residential immovable property	86.88%										
26	of which building renovation loans	100.00%										
27	of which motor vehicle loans	30.02%										
28	<b>Local governments financing</b>											
29	Housing financing											
30	Other local government financing											
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100.00%										
32	<b>Total GAR assets</b>	17.83%	0.62%	0.01%	0.17%	0.33%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date 31 December 2025 (Turnover based)																
% (compared to flow of total eligible assets)	Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
	Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling				
<b>GAR - Covered assets in both numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation			0.10%	0.00%	0.00%	0.01%	0.01%	0.00%	0.01%	26.62%	0.94%	0.01%	0.25%	0.49%	45.70%
2	<b>Financial undertakings</b>			0.08%	0.00%		0.04%	0.03%	0.03%	0.00%	8.02%	0.70%	0.06%	0.02%	0.07%	5.71%
3	Credit institutions			0.04%	0.00%		0.01%			0.00%	11.07%	1.00%	0.09%	0.03%	0.05%	3.80%
4	Loans and advances			0.04%	0.00%		0.01%			0.00%	10.83%	1.00%	0.08%	0.03%	0.05%	3.65%
5	Debt securities, including UoP			0.03%			0.01%			0.00%	17.09%	0.92%	0.30%	0.03%	0.07%	0.15%
6	Equity instruments															0.00%
7	Other financial corporations			0.16%	0.00%		0.10%	0.10%	0.10%	0.00%	1.95%	0.12%	0.00%	0.00%	0.10%	1.91%
8	of which investment firms															0.05%
9	Loans and advances															0.05%
10	Debt securities, including UoP															
11	Equity instruments															
12	of which management companies															0.04%
13	Loans and advances															0.00%
14	Debt securities, including UoP															
15	Equity instruments															0.04%
16	of which insurance undertakings															0.01%
17	Loans and advances															0.01%
18	Debt securities, including UoP															
19	Equity instruments															
20	<b>Non-financial undertakings</b>			0.86%	0.03%	0.00%	0.06%	0.02%	0.11%		16.45%	7.92%		2.26%	4.52%	4.91%
21	Loans and advances			0.88%	0.03%	0.00%	0.06%	0.02%	0.11%		16.81%	8.07%		2.32%	4.63%	4.79%
22	Debt securities, including UoP			0.04%							2.14%	2.06%				0.12%
23	Equity instruments															
24	<b>Households</b>										31.07%					35.08%
25	of which loans collateralised by residential immovable property										86.88%					11.07%
26	of which building renovation loans										100.00%					0.23%
27	of which motor vehicle loans										30.02%					3.51%
28	<b>Local governments financing</b>															
29	Housing financing															
30	Other local government financing															
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>										100.00%					0.01%
32	<b>Total GAR assets</b>			0.07%	0.00%	0.00%	0.01%	0.00%	0.00%	0.01%	17.93%	0.63%	0.01%	0.17%	0.33%	67.91%

5. KPI off-balance sheet exposures (Stock) – Turnover based data

		Disclosure reference date 31 December 2025 (Turnover based)										
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	9.71%	0.48%	0.00%	0.00%	0.09%	0.67%	0.00%		0.06%	0.00%	0.00%
2	Assets under management (AuM KPI)	3.72%	0.90%		0.10%	0.54%	0.16%	0.07%		0.06%	0.00%	0.00%

		Disclosure reference date 31 December 2025 (Turnover based)												
		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling			
1	Financial guarantees (FinGuar KPI)	0.49%	0.00%		0.03%	0.00%		0.06%		10.96%	0.48%	0.00%	0.00%	0.09%
2	Assets under management (AuM KPI)	0.40%	0.02%	0.01%	0.24%	0.00%		0.09%		4.61%	0.99%		0.10%	0.61%

5. KPI off-balance sheet exposures (Flow) – Turnover based data

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2025 (Turnover based)										
	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	
1 Financial guarantees (FinGuar KPI)	19.98%	0.66%	0.00%	0.00%	0.11%	1.23%	0.00%		0.05%	0.00%	0.00%
2 Assets under management (AuM KPI)	2.63%	0.67%		0.11%	0.39%	0.09%	0.06%			0.00%	0.00%

% (compared to total eligible off-balance sheet assets)	Disclosure reference date 31 December 2025 (Turnover based)												
	Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling		
1 Financial guarantees (FinGuar KPI)	0.89%	0.00%		0.03%			0.00%		22.12%	0.66%	0.00%	0.00%	0.11%
2 Assets under management (AuM KPI)	0.10%	0.02%	0.01%	0.10%	0.00%		0.05%		2.96%	0.74%		0.11%	0.45%

## 1. Assets for the calculation of GAR – CapEx based data

million HUF		Disclosure reference date 31 December 2025 (CapEx based)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
Total [gross] carrying amount		Of which Use of Proceeds			Of which transitional		Of which enabling		Of which Use of Proceeds		Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>													
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	20,030,822	6,664,776	162,919	9,678	9,712	100,704	19,552	122	74	248	151	5
2	<b>Financial undertakings</b>	2,406,410	245,313	23,590	7,863	1,904	4,653	1,239	54	6	42	14	
3	Credit institutions	1,595,815	218,258	20,041	7,670	1,243	2,591	1,227	53	6	42	14	
4	Loans and advances	1,096,162	108,684	10,532	2,671	411	1,586	632	12	0	17	1	
5	Debt securities, including UoP	482,578	107,170	9,318	4,999	745	907	594	40	5	20	13	
6	Equity instruments	17,076	2,403	191		87	97				5		
7	Other financial corporations	810,594	27,055	3,549	193	661	2,063	13	2	0	0	0	
8	of which investment firms	18,689											
9	Loans and advances	9,264											
10	Debt securities, including UoP	9,424											
11	Equity instruments	0											
12	of which management companies	33,510											
13	Loans and advances	36											
14	Debt securities, including UoP												
15	Equity instruments	33,474											
16	of which insurance undertakings	4,698											
17	Loans and advances	4,275											
18	Debt securities, including UoP												
19	Equity instruments	423											
20	<b>Non-financial undertakings</b>	1,761,478	351,727	139,329	1,815	7,808	96,051	18,312	68	68	206	137	5
21	Loans and advances	1,572,444	305,409	123,110	1,815	6,695	88,053	4,487			149	137	5
22	Debt securities, including UoP	188,951	46,256	16,156		1,113	7,936	13,825	68	68	57		
23	Equity instruments	83	63	63			63						
24	<b>Households</b>	15,862,934	6,067,735										
25	of which loans collateralised by residential immovable property	6,707,491	5,504,114										
26	of which building renovation loans	160,684	160,684										
27	of which motor vehicle loans	1,089,404	402,937										
28	<b>Local governments financing</b>												
29	Housing financing												
30	Other local government financing												

		Disclosure reference date 31 December 2025 (CapEx based)											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
million HUF	Total [gross] carrying amount	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which enabling		
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	14,699											
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	11,338,730											
33	<b>Financial and Non-financial undertakings</b>	8,891,558											
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,006,595											
35	Loans and advances	5,811,051											
36	of which loans collateralised by commercial immovable property												
37	of which building renovation loans												
38	Debt securities	194,722											
39	Equity instruments	821											
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,884,963											
41	Loans and advances	2,866,236											
42	Debt securities	15,698											
43	Equity instruments	3,028											
44	<b>Derivatives</b>	29,661											
45	<b>On demand interbank loans</b>	147,330											
46	<b>Cash and cash-related assets</b>	622,124											
47	<b>Other categories of assets (e.g. Goodwill, commodities etc.)</b>	1,648,057											
48	<b>Total GAR assets</b>	31,384,250	6,679,474	162,919	9,678	9,712	100,704	19,552	122	74	248	151	5
49	<b>Assets not covered for GAR calculation</b>	15,335,911											
50	<b>Central governments and Supranational issuers</b>	9,290,046											
51	<b>Central banks exposure</b>	5,728,758											
52	<b>Trading book</b>	317,107											
53	<b>Total assets</b>	46,720,161	6,679,474	162,919	9,678	9,712	100,704	19,552	122	74	248	151	5
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>													
54	Financial guarantees	334,092	41,897	2,487	9	14	155	468	0		0	0	
55	Assets under management	4,933,845	228,195	71,855		7,858	42,580	7,938	3,887	3,368	90	19	0
56	Of which debt securities	3,217,151	84,951	28,628		3,480	16,362	4,525	3,139	3,014	34	6	
57	Of which equity instruments	892,663	143,243	43,227		4,377	26,218	3,413	748	354	56	14	0

		Disclosure reference date 31 December 2025 (CapEx based)														
		Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)					
million HUF	Total [gross] carrying amount	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	20,030,822	11,609	1,608	80	5,573	826	500	5,568	11		6,707,326	165,636	9,678	9,712	101,364
2	<b>Financial undertakings</b>	2,406,410	2,743	94	73	721	500	500	229	11		250,288	24,263	7,863	1,904	5,231
3	Credit institutions	1,595,815	560	5		123			229	11		220,438	20,124	7,670	1,243	2,596
4	Loans and advances	1,096,162	266	0		87			191	1		109,877	10,548	2,671	411	1,587
5	Debt securities, including UoP	482,578	294	5		36			38	9		108,152	9,385	4,999	745	912
6	Equity instruments	17,076										2,408	191		87	97
7	Other financial corporations	810,594	2,184	88	73	597	500	500	0	0		29,849	4,139	193	661	2,635
8	of which investment firms	18,689														
9	Loans and advances	9,264														
10	Debt securities, including UoP	9,424														
11	Equity instruments	0														
12	of which management companies	33,510														
13	Loans and advances	36														
14	Debt securities, including UoP															
15	Equity instruments	33,474														
16	of which insurance undertakings	4,698														
17	Loans and advances	4,275														
18	Debt securities, including UoP															
19	Equity instruments	423														
20	<b>Non-financial undertakings</b>	1,761,478	8,866	1,514	8	4,852	326		5,340			389,304	141,374	1,815	7,808	96,132
21	Loans and advances	1,572,444	6,523	837	8	4,336	326		4,621			325,525	124,409	1,815	6,695	88,066
22	Debt securities, including UoP	188,951	2,343	677		516			719			63,716	16,902		1,113	8,004
23	Equity instruments	83										63	63			63
24	<b>Households</b>	15,862,934										6,067,735				
25	of which loans collateralised by residential immovable property	6,707,491										5,504,114				
26	of which building renovation loans	160,684										160,684				
27	of which motor vehicle loans	1,089,404										402,937				
28	<b>Local governments financing</b>															
29	Housing financing															
30	Other local government financing															
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	14,699										14,699				
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	11,338,730														
33	<b>Financial and Non-financial undertakings</b>	8,891,558														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,006,595														
35	Loans and advances	5,811,051														
36	of which loans collateralised by commercial immovable property															
37	of which building renovation loans															

million HUF		Total [gross] carrying amount	Disclosure reference date 31 December 2025 (CapEx based)												
			Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)					
			Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Of which transitional	Of which enabling	
38	Debt securities	194,722													
39	Equity instruments	821													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,884,963													
41	Loans and advances	2,866,236													
42	Debt securities	15,698													
43	Equity instruments	3,028													
44	Derivatives	29,661													
45	On demand interbank loans	147,330													
46	Cash and cash-related assets	622,124													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	1,648,057													
48	<b>Total GAR assets</b>	<b>31,384,250</b>	<b>11,609</b>	<b>1,608</b>	<b>80</b>	<b>5,573</b>	<b>826</b>	<b>500</b>	<b>5,568</b>	<b>11</b>	<b>6,722,025</b>	<b>165,636</b>	<b>9,678</b>	<b>9,712</b>	<b>101,364</b>
49	Assets not covered for GAR calculation	15,335,911													
50	Central governments and Supranational issuers	9,290,046													
51	Central banks exposure	5,728,758													
52	Trading book	317,107													
53	<b>Total assets</b>	<b>46,720,161</b>	<b>11,609</b>	<b>1,608</b>	<b>80</b>	<b>5,573</b>	<b>826</b>	<b>500</b>	<b>5,568</b>	<b>11</b>	<b>6,722,025</b>	<b>165,636</b>	<b>9,678</b>	<b>9,712</b>	<b>101,364</b>

		Disclosure reference date 31 December 2025 (CapEx based)													
		Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
million HUF		Total [gross] carrying amount	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which enabling	Use of Proceeds	Of which transitional	Of which enabling		
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>															
54	Financial guarantees	334,092	3,799		0			189			46,354	2,487	9	14	155
55	Assets under management	4,933,845	9,916	873	58	8,579	45	901	1		255,620	76,680		7,858	46,006
56	Of which debt securities	3,217,151	3,277	399		83	2	541	1		93,413	32,174		3,480	19,376
57	Of which equity instruments	892,663	6,635	474	58	8,496	43	360	1		162,204	44,506		4,377	26,630

## 1. Assets for the calculation of GAR – CapEx based data (T-1)

		Disclosure reference date 31 December 2024 (CapEx based)									
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			
million HUF	Total [gross] carrying amount	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	16,727,599	5,083,588*	80,382	767	45,373	10,740	304	38	0	33
2	<b>Financial undertakings</b>	2,157,696	53,508	3,106	756	719	695	109	22		
3	Credit institutions	1,724,030	50,014	2,979	704	675	688	99	22		
4	Loans and advances	1,145,822	50,014	2,979	704	675	688	99	22		
5	Debt securities, including UoP	578,186									
6	Equity instruments	22									
7	Other financial corporations	433,666	3,494	127	52	44	8	10			
8	of which investment firms	1,934									
9	Loans and advances	1,934									
10	Debt securities, including UoP										
11	Equity instruments	0									
12	of which management companies	6,625									
13	Loans and advances										
14	Debt securities, including UoP										
15	Equity instruments	6,625									
16	of which insurance undertakings	1,966									
17	Loans and advances	1,669									
18	Debt securities, including UoP										
19	Equity instruments	297									
20	<b>Non-financial undertakings</b>	877,837	127,133	77,275	11	44,654	10,045	195	16	0	33
21	Loans and advances	859,587	124,733	76,343	11	44,573	10,045	90	16	0	33
22	Debt securities, including UoP	18,159	2,318	851				105			
23	Equity instruments	91	81	81		81					
24	<b>Households</b>	13,692,065	4,902,947*								
25	of which loans collateralised by residential immovable property	6,014,461	4,406,279*								
26	of which building renovation loans	127,700	127,700*								
27	of which motor vehicle loans	743,909	368,969*								
28	<b>Local governments financing</b>										
29	Housing financing										
30	Other local government financing										

		Disclosure reference date 31 December 2024 (CapEx based)										
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
million HUF	Total [gross] carrying amount	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
31	Collateral obtained by taking possession: residential and commercial immovable properties	16,115										
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	12,303,916										
33	<b>Financial and Non-financial undertakings</b>	9,719,235										
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346										
35	Loans and advances	6,561,296										
36	of which loans collateralised by commercial immovable property											
37	of which building renovation loans											
38	Debt securities	306,914										
39	Equity instruments	67,136										
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889										
41	Loans and advances	2,767,099										
42	Debt securities	14,052										
43	Equity instruments	2,737										
44	<b>Derivatives</b>	50,334										
45	<b>On demand interbank loans</b>	379,446										
46	<b>Cash and cash-related assets</b>	667,872										
47	<b>Other categories of assets (e.g. Goodwill, commodities etc.)</b>	1,487,029										
48	<b>Total GAR assets</b>	29,047,630	5,083,588*	80,382	767	45,373	10,740	304	38	0	33	
49	<b>Assets not covered for GAR calculation</b>	15,804,501										
50	<b>Central governments and Supranational issuers</b>	8,149,592										
51	<b>Central banks exposure</b>	7,012,747										
52	<b>Trading book</b>	642,162										
53	<b>Total assets</b>	44,852,131	5,083,588*	80,382	767	45,373	10,740	304	38	0	33	
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>												
54	Financial guarantees	7,206										
55	Assets under management**	4,602,408	115,499	45,396		6,222	25,391	4,619	2,513	1,146	219	16
56	Of which debt securities**	1,779,041	35,155	8,629		1,380	2,704	1,247	1,247	2	15	0
57	Of which equity instruments**	792,238	80,344	36,767		4,842	22,687	3,372	1,265	1,143	204	16

		Disclosure reference date 31 December 2024 (CapEx based)													
		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)							
million HUF	Total [gross] carrying amount	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling					
<b>GAR - Covered assets in both numerator and denominator</b>															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	16,727,599	5,127	2,492		3,825		3			5,092,879*	82,911	767	45,373	10,740
2	<b>Financial undertakings</b>	2,157,696	108								53,725	3,128	756	719	695
3	Credit institutions	1,724,030									50,113	3,001	704	675	688
4	Loans and advances	1,145,822									50,113	3,001	704	675	688
5	Debt securities, including UoP	578,186													
6	Equity instruments	22													
7	Other financial corporations	433,666	108								3,612	127	52	44	8
8	of which investment firms	1,934													
9	Loans and advances	1,934													
10	Debt securities, including UoP														
11	Equity instruments	0													
12	of which management companies	6,625													
13	Loans and advances														
14	Debt securities, including UoP														
15	Equity instruments	6,625													
16	of which insurance undertakings	1,966													
17	Loans and advances	1,669													
18	Debt securities, including UoP														
19	Equity instruments	297													
20	<b>Non-financial undertakings</b>	877,837	5,019	2,492		3,825		3			136,207	79,783	11	44,654	10,045
21	Loans and advances	859,587	5,007	2,492		3,825		3			133,691	78,851	11	44,573	10,045
22	Debt securities, including UoP	18,159	12								2,435	851			
23	Equity instruments	91									81	81		81	
24	<b>Households</b>	13,692,065									4,902,947*				
25	of which loans collateralised by residential immovable property	6,014,461									4,406,279*				
26	of which building renovation loans	127,700									127,700*				
27	of which motor vehicle loans	743,909									368,969*				
28	<b>Local governments financing</b>														
29	Housing financing														
30	Other local government financing														
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	16,115													
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	12,303,916													
33	<b>Financial and Non-financial undertakings</b>	9,719,235													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	6,935,346													
35	Loans and advances	6,561,296													
36	of which loans collateralised by commercial immovable property														
37	of which building renovation loans														
38	Debt securities	306,914													

		Disclosure reference date 31 December 2024 (CapEx based)										
		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)				
million HUF	Total [gross] carrying amount	Of which Proceeds	Of which enabling	Of which Proceeds	Of which enabling	Of which Proceeds	Of which enabling	Of which Proceeds	Of which transitional	Of which enabling		
39	Equity instruments	67,136										
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,783,889										
41	Loans and advances	2,767,099										
42	Debt securities	14,052										
43	Equity instruments	2,737										
44	Derivatives	50,334										
45	On demand interbank loans	379,446										
46	Cash and cash-related assets	667,872										
47	Other categories of assets (e.g. Goodwill, commodities etc.)	1,487,029										
48	<b>Total GAR assets</b>	29,047,630	5,127	2,492	3,825		3	5,092,879*	82,911	767	45,373	10,740
49	<b>Assets not covered for GAR calculation</b>	15,804,501										
50	Central governments and Supranational issuers	8,149,592										
51	Central banks exposure	7,012,747										
52	Trading book	642,162										
53	<b>Total assets</b>	44,852,131	5,127				3	5,092,879*	80,419	767	45,373	10,740

million HUF		Disclosure reference date 31 December 2024 (CapEx based)											
		Circular economy (CE)			Pollution (PPC)		Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			
Total [gross] carrying amount		Use of Proceeds		Of which enabling		Use of Proceeds		Of which enabling		Use of Proceeds		Of which enabling	
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>													
54	Financial guarantees	7,206											
55	Assets under management**	4,602,408	7,799	663	54	4,446	38	11	1	132,594	48,626	6,222	26,591
56	Of which debt securities**	1,779,041	31	31		3		0	0	36,451	9,908	1,380	2,706
57	Of which equity instruments**	792,238	7,769	632	54	4,443	38	11	1	96,143	38,718	4,842	23,885

\*The data marked with an \* in the table have been recalculated, as non-EU household exposures have been included in the GAR report.

\*\*The EU Taxonomy tables of OTP Fund Management will be restated for the year 2024 due to corrections in client data previously utilized. In line with this, the corresponding rows of the EU Taxonomy tables relating to the off-balance sheet exposures of OTP Bank Plc. will also be restated.

2. GAR sector information – CapEx based data

Disclosure reference date 31 December 2025 (CapEx based)													
Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		
	million	Of which environmentally sustainable (CCM)	million	Of which environmentally sustainable (CCM)	million	Of which environmentally sustainable (CCA)	million	Of which environmentally sustainable (CCA)	million	Of which environmentally sustainable (WTR)	million	Of which environmentally sustainable (WTR)	million
HUF	HUF	HUF	HUF	HUF	HUF	HUF	HUF	HUF	HUF	HUF	HUF	HUF	HUF
1	0150-Mixed farming	67											
2	0510-Mining of hard coal	3,145	3,014			44							
3	0893-Extraction of salt	0											
4	0910-Support activities for petroleum and natural gas extraction	0	0										
5	1039-Other processing and preserving of fruit and vegetables	4,447								8			
6	1062-Manufacture of starches and starch products	2,124	3,251										
7	1071-Manufacture of bread; manufacture of fresh pastry goods and cakes	71								2			
8	1082-Manufacture of cocoa, chocolate and sugar confectionery	482											
9	1086-Manufacture of homogenised food preparations and dietetic food	34				1				0			
10	1107-Manufacture of soft drinks; production of mineral waters and other bottled waters	8	0							0			
11	1414-Manufacture of underwear	1											
12	1812-Other printing	1	0										
13	1920-Manufacture of refined petroleum products	4,925	996										
14	2011-Manufacture of industrial gases	30,422	4,883										
15	2014-Manufacture of other organic basic chemicals	185	27										
16	2016-Manufacture of plastics in primary forms	0	0										
17	2110-Manufacture of basic pharmaceutical products	146											
18	2120-Manufacture of pharmaceutical preparations	474								0			
19	2219-Manufacture of other rubber products	1,993											
20	2221-Manufacture of plastic plates, sheets, tubes and profiles	1,393											
21	2229-Manufacture of other plastic products	5											
22	2361-Manufacture of concrete products for construction purposes	12											
23	2399-Manufacture of other non-metallic mineral products n.e.c.	95											
24	2410-Manufacture of basic iron and steel and of ferro-alloys	20,859											
25	2434-Cold drawing of wire	9											
26	2442-Aluminium production	7,050	2,285										
27	2443-Lead, zinc and tin production	26											
28	2511-Manufacture of metal structures and parts of structures	2,639				2							
29	2530-Manufacture of steam generators, except central heating hot water boilers	1	1										
30	2550-Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0	0										
31	2592-Manufacture of light metal packaging	35											
32	2611-Manufacture of electronic components	66											
33	2620-Manufacture of computers and peripheral equipment	541											
34	2711-Manufacture of electric motors, generators and transformers	5,945				8							
35	2720-Manufacture of batteries and accumulators	1,653	1,496										
36	2740-Manufacture of electric lighting equipment	3,051	890										
37	2891-Manufacture of machinery for metallurgy	324											
38	2910-Manufacture of motor vehicles	2,144	694										
39	2920-Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	960	572										
40	2932-Manufacture of other parts and accessories for motor vehicles	16	5										

Breakdown by sector - NACE 4 digits level (code and label)		Disclosure reference date 31 December 2025 (CapEx based)											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable
million HUF	(CCM)	million HUF	(CCM)	million HUF	(CCA)	million HUF	(CCA)	million HUF	(WTR)	million HUF	(WTR)		
41	3020-Manufacture of railway locomotives and rolling stock	1	0										
42	3101-Manufacture of office and shop furniture	18											
43	3312-Repair of machinery	2	2										
44	3511-Production of electricity	8,150	7,983			68	68			0	0		
45	3512-Transmission of electricity	7,625	557										
46	3513-Distribution of electricity	7,174	7,173										
47	3514-Trade of electricity	1	1										
48	3522-Distribution of gaseous fuels through mains	2,382	2,237										
49	3523-Trade of gas through mains	6,603	5,873			64				66	66		
50	3530-Steam and air conditioning supply	8,571	0			35				0	0		
51	3600-Water collection, treatment and supply	4,998				20				0			
52	3811-Collection of non-hazardous waste	2,774	255			5				49			
53	4120-Construction of residential and non-residential buildings	1,017	0			0							
54	4211-Construction of roads and motorways	3,524	0			2,867							
55	4212-Construction of railways and underground railways	442	0										
56	4221-Construction of utility projects for fluids	0	0							0	0		
57	4299-Construction of other civil engineering projects n.e.c.	0	0										
58	4511-Sale of cars and light motor vehicles	8,384	83										
59	4531-Wholesale trade of motor vehicle parts and accessories	67											
60	4618-Agents specialised in the sale of other particular products	9											
61	4619-Agents involved in the sale of a variety of goods	0								0			
62	4631-Wholesale of fruit and vegetables	145											
63	4641-Wholesale of textiles	0											
64	4646-Wholesale of pharmaceutical goods	264											
65	4671-Wholesale of solid, liquid and gaseous fuels and related products	1,504	963							70	70		
66	4672-Wholesale of metals and metal ores	22											
67	4673-Wholesale of wood, construction materials and sanitary equipment	2	0										
68	4675-Wholesale of chemical products	60											
69	4690-Non-specialised wholesale trade	989	27			8				0			
70	4711-Retail sale in non-specialised stores with food, beverages or tobacco predominating	263	40										
71	4719-Other retail sale in non-specialised stores	19											
72	4730-Retail sale of automotive fuel in specialised stores	6,091	144										
73	4754-Retail sale of electrical household appliances in specialised stores	310											
74	4773-Dispensing chemist in specialised stores	1				0				0			
75	4920-Freight rail transport	1,814											
76	4931-Urban and suburban passenger land transport	6,678				7							
77	4941-Freight transport by road	3,131											
78	4950-Transport via pipeline	7,352	5,130			66							
79	5110-Passenger air transport	0	0										
80	5221-Service activities incidental to land transportation	119											
81	5229-Other transportation support activities	0	0										
82	5310-Postal activities under universal service obligation	0	0										
83	5510-Hotels and similar accommodation	14,666	5,213			0							
84	6110-Wired telecommunications activities	331	6			1,318							
85	6120-Wireless telecommunications activities	76	3										
86	6190-Other telecommunications activities	18											
87	6201-Computer programming activities	1,086	11			217							

Breakdown by sector - NACE 4 digits level (code and label)		Disclosure reference date 31 December 2025 (CapEx based)											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable	[Gross] carrying amount	Of which environmentally sustainable
million HUF	(CCM)	million HUF	(CCM)	million HUF	(CCA)	million HUF	(CCA)	million HUF	(WTR)	million HUF	(WTR)		
88	6203-Computer facilities management activities	17											
89	6209-Other information technology and computer service activities	0											
90	6312-Web portals	0											
91	6420-Activities of holding companies	28,458	25,816		0								
92	6492-Other credit granting	0	0										
93	6810-Buying and selling of own real estate	15,703	2,257										
94	6820-Renting and operating of own or leased real estate	1,284	19										
95	7010-Activities of head offices	78,326	56,297		164				10				
96	7022-Business and other management consultancy activities	66	0		13,418								
97	7112-Engineering activities and related technical consultancy	0	0		0								
98	7120-Technical testing and analysis	0	0										
99	7711-Renting and leasing of cars and light motor vehicles	24,851	1,110										
100	8121-General cleaning of buildings	0			0				0				
101	8220-Activities of call centres	12	12										
102	8299-Other business support service activities n.e.c.	3	1		0								
103	9200-Gambling and betting activities	860											
104	9601-Washing and (dry-)cleaning of textile and fur products	0											
105	9604-Activities of physical well-being institutes	119											

Disclosure reference date 31 December 2025 (CapEx based)														
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	[Gross] carrying amount
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	0150-Mixed farming											67		
2	0510-Mining of hard coal									2		3,190	3,014	
3	0893-Extraction of salt											0		
4	0910-Support activities for petroleum and natural gas extraction											0	0	
5	1039-Other processing and preserving of fruit and vegetables				388							4,844		
6	1062-Manufacture of starches and starch products											2,124	3,251	
7	1071-Manufacture of bread; manufacture of fresh pastry goods and cakes	0										73		
8	1082-Manufacture of cocoa, chocolate and sugar confectionery											482		
9	1086-Manufacture of homogenised food preparations and dietetic food											35		
10	1107-Manufacture of soft drinks; production of mineral waters and other bottled waters	0	0									8	0	
11	1414-Manufacture of underwear											1		
12	1812-Other printing											1	0	
13	1920-Manufacture of refined petroleum products	730	669									5,655	1,666	
14	2011-Manufacture of industrial gases											30,422	4,883	
15	2014-Manufacture of other organic basic chemicals				2							187	27	
16	2016-Manufacture of plastics in primary forms	0	0									0	0	
17	2110-Manufacture of basic pharmaceutical products				421							567		
18	2120-Manufacture of pharmaceutical preparations				910							1,384		
19	2219-Manufacture of other rubber products											1,993		
20	2221-Manufacture of plastic plates, sheets, tubes and profiles											1,393		
21	2229-Manufacture of other plastic products											5		
22	2361-Manufacture of concrete products for construction purposes											12		
23	2399-Manufacture of other non-metallic mineral products n.e.c.											95		
24	2410-Manufacture of basic iron and steel and of ferro-alloys											20,859		
25	2434-Cold drawing of wire											9		
26	2442-Aluminium production											7,050	2,285	
27	2443-Lead, zinc and tin production											26		

Disclosure reference date 31 December 2025 (CapEx based)																
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
28	2511-Manufacture of metal structures and parts of structures	169											2,810			
29	2530-Manufacture of steam generators, except central heating hot water boilers	0											1	1		
30	2550-Forging, pressing, stamping and roll-forming of metal; powder metallurgy												0	0		
31	2592-Manufacture of light metal packaging												35			
32	2611-Manufacture of electronic components												66			
33	2620-Manufacture of computers and peripheral equipment												541			
34	2711-Manufacture of electric motors, generators and transformers	777											6,730			
35	2720-Manufacture of batteries and accumulators	17	17										1,670	1,514		
36	2740-Manufacture of electric lighting equipment												3,051	890		
37	2891-Manufacture of machinery for metallurgy												324			
38	2910-Manufacture of motor vehicles												2,144	694		
39	2920-Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers												960	572		
40	2932-Manufacture of other parts and accessories for motor vehicles	1	0										17	6		
41	3020-Manufacture of railway locomotives and rolling stock	0	0										1	0		
42	3101-Manufacture of office and shop furniture												18			
43	3312-Repair of machinery												2	2		
44	3511-Production of electricity	0	0	0	0								8,219	8,051		
45	3512-Transmission of electricity	4,347											11,972	557		
46	3513-Distribution of electricity												7,174	7,173		
47	3514-Trade of electricity												1	1		
48	3522-Distribution of gaseous fuels through mains							694					3,076	2,237		
49	3523-Trade of gas through mains	74	36	201	158			2					7,011	6,133		
50	3530-Steam and air conditioning supply	0	0	0	0								8,606	0		
51	3600-Water collection, treatment and supply	0						0					5,019			
52	3811-Collection of non-hazardous waste	475	216						25				3,327	470		
53	4120-Construction of residential and non-residential buildings	0											1,017	0		
54	4211-Construction of roads and motorways	0											6,391	0		

Disclosure reference date 31 December 2025 (CapEx based)															
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)		
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million HUF
55	4212-Construction of railways and underground railways												442	0	
56	4221-Construction of utility projects for fluids	0	0	0	0								0	0	
57	4299-Construction of other civil engineering projects n.e.c.									0			0	0	
58	4511-Sale of cars and light motor vehicles												8,384	83	
59	4531-Wholesale trade of motor vehicle parts and accessories												67		
60	4618-Agents specialised in the sale of other particular products												9		
61	4619-Agents involved in the sale of a variety of goods			0									0		
62	4631-Wholesale of fruit and vegetables												145		
63	4641-Wholesale of textiles												0		
64	4646-Wholesale of pharmaceutical goods			516									780		
65	4671-Wholesale of solid, liquid and gaseous fuels and related products	97	55	214	168								1,886	1,257	
66	4672-Wholesale of metals and metal ores												22		
67	4673-Wholesale of wood, construction materials and sanitary equipment												2	0	
68	4675-Wholesale of chemical products												60		
69	4690-Non-specialised wholesale trade	44	7										1,041	35	
70	4711-Retail sale in non-specialised stores with food, beverages or tobacco predominating												263	40	
71	4719-Other retail sale in non-specialised stores												19		
72	4730-Retail sale of automotive fuel in specialised stores												6,091	144	
73	4754-Retail sale of electrical household appliances in specialised stores	10											321		
74	4773-Dispensing chemist in specialised stores	0								0			1		
75	4920-Freight rail transport												1,814		
76	4931-Urban and suburban passenger land transport												6,685		
77	4941-Freight transport by road												3,131		
78	4950-Transport via pipeline	540	495							3			7,961	5,625	
79	5110-Passenger air transport												0	0	
80	5221-Service activities incidental to land transportation												119		
81	5229-Other transportation support activities												0	0	

Disclosure reference date 31 December 2025 (CapEx based)															
Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)		
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount
	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (CE)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (PPC)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (BIO)	million HUF	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	million HUF
82	5310-Postal activities under universal service obligation												0	0	
83	5510-Hotels and similar accommodation								4,599				19,265	5,213	
84	6110-Wired telecommunications activities	147	15										1,795	21	
85	6120-Wireless telecommunications activities	31											107	3	
86	6190-Other telecommunications activities	7	3										25	3	
87	6201-Computer programming activities												1,303	11	
88	6203-Computer facilities management activities	10											27		
89	6209-Other information technology and computer service activities												0		
90	6312-Web portals												0		
91	6420-Activities of holding companies	0	0										28,458	25,816	
92	6492-Other credit granting	0	0										0	0	
93	6810-Buying and selling of own real estate								3				15,706	2,257	
94	6820-Renting and operating of own or leased real estate	2											1,287	19	
95	7010-Activities of head offices	1,388			2,200								82,087	56,297	
96	7022-Business and other management consultancy activities												13,484	0	
97	7112-Engineering activities and related technical consultancy	0											0	0	
98	7120-Technical testing and analysis												0	0	
99	7711-Renting and leasing of cars and light motor vehicles	0	0										24,851	1,110	
100	8121-General cleaning of buildings	0							0				0		
101	8220-Activities of call centres												12	12	
102	8299-Other business support service activities n.e.c.												3	1	
103	9200-Gambling and betting activities								13				873		
104	9601-Washing and (dry-)cleaning of textile and fur products								0				0		
105	9604-Activities of physical well-being institutes												119		

3. GAR KPI Stock – CAPEX based data

		Disclosure reference date 31 December 2025 (CapEx based)										
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)				
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds Of which transitional Of which enabling			Of which Use of Proceeds Of which enabling			Of which Use of Proceeds Of which enabling				
<b>GAR - Covered assets in both numerator and denominator</b>												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	33.27%	0.81%	0.05%	0.05%	0.50%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%
2	<b>Financial undertakings</b>	10.19%	0.98%	0.33%	0.08%	0.19%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	13.68%	1.26%	0.48%	0.08%	0.16%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	9.92%	0.96%	0.24%	0.04%	0.14%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	22.21%	1.93%	1.04%	0.15%	0.19%	0.12%	0.01%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	14.07%	1.12%		0.51%	0.57%				0.03%		
7	Other financial corporations	3.34%	0.44%	0.02%	0.08%	0.25%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms											
9	Loans and advances											
10	Debt securities, including UoP											
11	Equity instruments											
12	of which management companies											
13	Loans and advances											
14	Debt securities, including UoP											
15	Equity instruments											
16	of which insurance undertakings											
17	Loans and advances											
18	Debt securities, including UoP											
19	Equity instruments											
20	<b>Non-financial undertakings</b>	19.97%	7.91%	0.10%	0.44%	5.45%	1.04%	0.00%	0.00%	0.01%	0.01%	0.00%
21	Loans and advances	19.42%	7.83%	0.12%	0.43%	5.60%	0.29%			0.01%	0.01%	0.00%
22	Debt securities, including UoP	24.48%	8.55%		0.59%	4.20%	7.32%	0.04%	0.04%	0.03%		
23	Equity instruments	75.70%	75.70%			75.70%						
24	<b>Households</b>	38.25%										
25	of which loans collateralised by residential immovable property	82.06%										
26	of which building renovation loans	100.00%										
27	of which motor vehicle loans	36.99%										
28	<b>Local governments financing</b>											
29	Housing financing											
30	Other local government financing											
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100.00%										
32	<b>Total GAR assets</b>	21.28%	0.52%	0.03%	0.03%	0.32%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date 31 December 2025 (CapEx based)																
% (compared to total covered assets in the denominator)	Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
	Of which Proceeds	Use of	Of which enabling	Of which Proceeds	Use of	Of which enabling	Of which Proceeds	Use of	Of which enabling	Of which Proceeds	Use of	Of which transitional	Of which enabling	Of which	Of which	Proportion of total assets covered
<b>GAR - Covered assets in both numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.06%	0.01%	0.00%	0.03%	0.00%	0.00%	0.03%	0.00%	33.49%	0.83%	0.05%	0.05%	0.51%	42.87%	
2	<b>Financial undertakings</b>	0.11%	0.00%	0.00%	0.03%	0.02%	0.02%	0.01%	0.00%	10.40%	1.01%	0.33%	0.08%	0.22%	5.15%	
3	Credit institutions	0.04%	0.00%		0.01%			0.01%	0.00%	13.81%	1.26%	0.48%	0.08%	0.16%	3.42%	
4	Loans and advances	0.02%	0.00%		0.01%			0.02%	0.00%	10.02%	0.96%	0.24%	0.04%	0.14%	2.35%	
5	Debt securities, including UoP	0.06%	0.00%		0.01%			0.01%	0.00%	22.41%	1.94%	1.04%	0.15%	0.19%	1.03%	
6	Equity instruments									14.10%	1.12%		0.51%	0.57%	0.04%	
7	Other financial corporations	0.27%	0.01%	0.01%	0.07%	0.06%	0.06%	0.00%	0.00%	3.68%	0.51%	0.02%	0.08%	0.33%	1.73%	
8	of which investment firms														0.04%	
9	Loans and advances														0.02%	
10	Debt securities, including UoP														0.02%	
11	Equity instruments														0.00%	
12	of which management companies														0.07%	
13	Loans and advances														0.00%	
14	Debt securities, including UoP														0.07%	
15	Equity instruments														0.07%	
16	of which insurance undertakings														0.01%	
17	Loans and advances														0.01%	
18	Debt securities, including UoP															
19	Equity instruments														0.00%	
20	<b>Non-financial undertakings</b>	0.50%	0.09%	0.00%	0.28%	0.02%		0.30%		22.10%	8.03%	0.10%	0.44%	5.46%	3.77%	
21	Loans and advances	0.41%	0.05%	0.00%	0.28%	0.02%		0.29%		20.70%	7.91%	0.12%	0.43%	5.60%	3.37%	
22	Debt securities, including UoP	1.24%	0.36%		0.27%			0.38%		33.72%	8.95%		0.59%	4.24%	0.40%	
23	Equity instruments									75.70%	75.70%			75.70%	0.00%	
24	<b>Households</b>									38.25%					33.95%	
25	of which loans collateralised by residential immovable property									82.06%					14.36%	
26	of which building renovation loans									100.00%					0.34%	
27	of which motor vehicle loans									36.99%					2.33%	
28	<b>Local governments financing</b>															
29	Housing financing															
30	Other local government financing															
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>									100.00%					0.03%	
32	<b>Total GAR assets</b>	0.04%	0.01%	0.00%	0.02%	0.00%	0.00%	0.02%	0.00%	21.42%	0.53%	0.03%	0.03%	0.32%	67.17%	

3. GAR KPI Stock – CapEx based data (T-1)

% (compared to total covered assets in the denominator)		Disclosure reference date 31 December 2024 (CapEx based)									
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	30.39%*	0.48%	0.00%	0.27%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%
2	<b>Financial undertakings</b>	2.48%	0.14%	0.04%	0.03%	0.03%	0.01%	0.00%			
3	Credit institutions	2.90%	0.17%	0.04%	0.04%	0.04%	0.01%	0.00%			
4	Loans and advances	4.36%	0.26%	0.06%	0.06%	0.06%	0.01%	0.00%			
5	Debt securities, including UoP										
6	Equity instruments										
7	Other financial corporations	0.81%	0.03%	0.01%	0.01%	0.00%	0.00%				
8	of which investment firms										
9	Loans and advances										
10	Debt securities, including UoP										
11	Equity instruments										
12	of which management companies										
13	Loans and advances										
14	Debt securities, including UoP										
15	Equity instruments										
16	of which insurance undertakings										
17	Loans and advances										
18	Debt securities, including UoP										
19	Equity instruments										
20	<b>Non-financial undertakings</b>	14.48%	8.80%	0.00%	5.09%	1.14%	0.02%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	14.51%	8.88%	0.00%	5.19%	1.17%	0.01%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	12.77%	4.69%				0.58%				
23	Equity instruments	88.70%	88.70%		88.70%						
24	<b>Households</b>	35.81%*									
25	of which loans collateralised by residential immovable property	73.26%*									
26	of which building renovation loans	100.00%*									
27	of which motor vehicle loans	49.60%*									
28	<b>Local governments financing</b>										
29	Housing financing										
30	Other local government financing										
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>										
32	<b>Total GAR assets</b>	17.50%*	0.28%	0.00%	0.16%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date 31 December 2024 (CapEx based)												
% (compared to total covered assets in the denominator)	Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	
<b>GAR - Covered assets in both numerator and denominator</b>												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation		0.03%	0.01%	0.02%	0.00%	30.45%*	0.50%	0.00%	0.27%	0.06%	37.29%
2	<b>Financial undertakings</b>		0.01%				2.49%	0.14%	0.04%	0.03%	0.03%	4.81%
3	Credit institutions						2.91%	0.17%	0.04%	0.04%	0.04%	3.84%
4	Loans and advances						4.37%	0.26%	0.06%	0.06%	0.06%	2.55%
5	Debt securities, including UoP											1.29%
6	Equity instruments											0.00%
7	Other financial corporations		0.02%				0.83%	0.03%	0.01%	0.01%	0.00%	0.97%
8	of which investment firms											0.00%
9	Loans and advances											0.00%
10	Debt securities, including UoP											0.00%
11	Equity instruments											0.00%
12	of which management companies											0.01%
13	Loans and advances											0.00%
14	Debt securities, including UoP											0.01%
15	Equity instruments											0.00%
16	of which insurance undertakings											0.00%
17	Loans and advances											0.00%
18	Debt securities, including UoP											0.00%
19	Equity instruments											0.00%
20	<b>Non-financial undertakings</b>		0.57%	0.28%	0.44%	0.00%	15.52%	9.09%	0.00%	5.09%	1.14%	1.96%
21	Loans and advances		0.58%	0.29%	0.45%	0.00%	15.55%	9.17%	0.00%	5.19%	1.17%	1.92%
22	Debt securities, including UoP		0.07%				13.41%	4.69%				0.04%
23	Equity instruments						88.70%	88.70%			88.70%	0.00%
24	<b>Households</b>						35.81%*					30.53%
25	of which loans collateralised by residential immovable property						73.26%*					13.41%
26	of which building renovation loans						100.00%*					0.28%
27	of which motor vehicle loans						49.60%*					1.66%
28	<b>Local governments financing</b>											
29	Housing financing											
30	Other local government financing											
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>											0.04%
32	<b>Total GAR assets</b>		0.02%	0.01%	0.01%	0.00%	17.53%*	0.29%	0.00%	0.16%	0.04%	64.76%

\*The data marked with an \* in the table have been recalculated, as non-EU household exposures have been included in the GAR report.

4. GAR KPI Flow – CapEx based data

Disclosure reference date 31 December 2025 (CapEx based)												
% (compared to flow of total eligible assets)		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	27.22%	1.36%	0.01%	0.09%	0.96%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%
2	<b>Financial undertakings</b>	7.76%	0.72%	0.07%	0.02%	0.06%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	11.07%	1.05%	0.10%	0.03%	0.09%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	10.79%	1.04%	0.08%	0.03%	0.08%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	18.12%	1.23%	0.56%	0.05%	0.11%	0.11%	0.00%		0.00%	0.00%	
6	Equity instruments											
7	Other financial corporations	1.19%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	
8	of which investment firms											
9	Loans and advances											
10	Debt securities, including UoP											
11	Equity instruments											
12	of which management companies											
13	Loans and advances											
14	Debt securities, including UoP											
15	Equity instruments											
16	of which insurance undertakings											
17	Loans and advances											
18	Debt securities, including UoP											
19	Equity instruments											
20	<b>Non-financial undertakings</b>	22.33%	11.86%		0.81%	8.86%	0.23%			0.02%	0.02%	0.00%
21	Loans and advances	22.22%	12.15%		0.83%	9.08%	0.19%			0.02%	0.02%	0.00%
22	Debt securities, including UoP	27.07%	0.06%				1.76%			0.04%		
23	Equity instruments											
24	<b>Households</b>	31.07%										
25	of which loans collateralised by residential immovable property	86.88%										
26	of which building renovation loans	100.00%										
27	of which motor vehicle loans	30.02%										
28	<b>Local governments financing</b>											
29	Housing financing											
30	Other local government financing											
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	100.00%										
32	<b>Total GAR assets</b>	18.34%	0.92%	0.01%	0.06%	0.65%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date 31 December 2025 (CapEx based)															
% (compared to flow of total eligible assets)	Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
	Of which Proceeds	Use of	which enabling	Of which Proceeds	Use of	which enabling	Of which Proceeds	Use of	which enabling	Of which Proceeds	Use of	Of which	Of which	which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.03%	0.01%	0.00%	0.01%	0.01%	0.00%	0.03%	0.00%	27.32%	1.38%	0.01%	0.09%	0.96%	45.70%
2	<b>Financial undertakings</b>	0.07%	0.00%		0.04%	0.03%	0.03%	0.00%	0.00%	7.91%	0.75%	0.07%	0.02%	0.09%	5.71%
3	Credit institutions	0.03%	0.00%		0.00%			0.00%	0.00%	11.16%	1.05%	0.10%	0.03%	0.09%	3.80%
4	Loans and advances	0.03%	0.00%		0.00%			0.00%	0.00%	10.88%	1.04%	0.08%	0.03%	0.08%	3.65%
5	Debt securities, including UoP	0.03%			0.00%					18.26%	1.24%	0.56%	0.05%	0.11%	0.15%
6	Equity instruments														0.00%
7	Other financial corporations	0.15%	0.00%		0.10%	0.09%	0.09%	0.00%	0.00%	1.44%	0.15%	0.00%	0.01%	0.10%	1.91%
8	of which investment firms														0.05%
9	Loans and advances														0.05%
10	Debt securities, including UoP														
11	Equity instruments														
12	of which management companies														0.04%
13	Loans and advances														0.00%
14	Debt securities, including UoP														
15	Equity instruments														0.04%
16	of which insurance undertakings														0.01%
17	Loans and advances														0.01%
18	Debt securities, including UoP														
19	Equity instruments														
20	<b>Non-financial undertakings</b>	0.20%	0.10%	0.00%	0.06%	0.04%		0.25%		23.09%	12.03%		0.81%	8.86%	4.91%
21	Loans and advances	0.20%	0.11%	0.00%	0.07%	0.04%		0.25%		22.95%	12.32%		0.83%	9.08%	4.79%
22	Debt securities, including UoP									28.88%	0.06%				0.12%
23	Equity instruments														
24	<b>Households</b>									31.07%					35.08%
25	of which loans collateralised by residential immovable property									86.88%					11.07%
26	of which building renovation loans									100.00%					0.23%
27	of which motor vehicle loans									30.02%					3.51%
28	<b>Local governments financing</b>														
29	Housing financing														
30	Other local government financing														
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>									100.00%					0.01%
32	<b>Total GAR assets</b>	0.02%	0.01%	0.00%	0.01%	0.01%	0.00%	0.02%	0.00%	18.40%	0.93%	0.01%	0.06%	0.65%	67.91%

5. KPI off-balance sheet exposures (Stock) – CAPEX based data

		Disclosure reference date 31 December 2025 (CapEx based)										
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling		
1	Financial guarantees (FinGuar KPI)	12.54%	0.74%	0.00%	0.00%	0.05%	0.14%	0.00%		0.00%	0.00%	
2	Assets under management (AuM KPI)	4.63%	1.46%		0.16%	0.86%	0.16%	0.08%	0.07%	0.00%	0.00%	0.00%

		Disclosure reference date 31 December 2025 (CapEx based)										
		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling		
1	Financial guarantees (FinGuar KPI)	1.14%		0.00%		0.06%		13.87%	0.74%	0.00%	0.00%	0.05%
2	Assets under management (AuM KPI)	0.20%	0.02%	0.00%	0.17%	0.00%	0.02%	0.00%	5.18%	1.55%	0.16%	0.93%

5. KPI off-balance sheet exposures (Flow) – CAPEX based data

% (compared to total eligible off-balance sheet assets)		Disclosure reference date 31 December 2025 (CapEx based)									
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling		
1	Financial guarantees (FinGuar KPI)	23.72%	0.75%	0.00%	0.00%	0.06%	0.15%			0.00%	0.00%
2	Assets under management (AuM KPI)	3.16%	1.00%		0.12%	0.63%	0.09%	0.07%	0.07%	0.00%	0.00%

% (compared to total eligible off-balance sheet assets)		Disclosure reference date 31 December 2025 (CapEx based)										
		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling		
1	Financial guarantees (FinGuar KPI)	2.63%		0.00%		0.00%		26.49%	0.75%	0.00%	0.00%	0.06%
2	Assets under management (AuM KPI)	0.07%	0.01%	0.00%	0.03%	0.00%	0.01%	0.00%	3.36%	1.08%	0.12%	0.69%

## Additional disclosure: Mandatory templates for Nuclear Energy and Fossil gas-related activities

Pursuant to Article 8, points 6-7 of Regulation (EU) 2021/2178, the Bank provides the following disclosures, which have been prepared on the basis of publicly available and relevant data published by the respective counterparties.

Compared to last year, the insignificant percentage increase in values is primarily due to the fact that more public data was taken into account in the analysis.

Where the value of a cell is zero, the respective cell remains blank.

### Template 1: Nuclear and fossil gas related activities- Stock

Row	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

## Template 2: Taxonomy-aligned economic activities (denominator)- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							0	0.00%	0	0.00%		
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%			88	0.00%	88	0.00%		
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	11,355	0.04%	11,355	0.04%			2,425	0.01%	2,425	0.01%		
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							0	0.00%	0	0.00%		
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	22	0.00%	22	0.00%			27	0.00%	27	0.00%		
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0.00%	6	0.00%								
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	99,195	0.32%	99,172	0.32%	24	0.00%	160,500	0.51%	160,377	0.51%	122	0.00%
8	<b>Total applicable KPI</b>	110,579	0.35%	110,555	0.35%	24	0.00%	163,041	0.52%	162,919	0.52%	122	0.00%

## Template 3: Taxonomy-aligned economic activities (numerator)- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							0	0.00%	0	0.00%		
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.00%	0	0.00%			88	0.05%	88	0.05%		
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	11,355	10.27%	11,355	10.27%			2,425	1.49%	2,425	1.49%		
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							0	0.00%	0	0.00%		
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	22	0.02%	22	0.02%			27	0.02%	27	0.02%		
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0.01%	6	0.01%								
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	99,195	89.71%	99,172	89.70%	24	100.00%	160,500	98.44%	160,377	98.44%	122	100.00%
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	110,579	100.00%	110,555	100.00%	24	100.00%	163,041	100.00%	162,919	100.00%	122	100.00%

## Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	8	0.00%	8	0.00%								
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.00%	1	0.00%			27	0.00%	27	0.00%		
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	34	0.00%	34	0.00%			929	0.00%	929	0.00%		
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,791	0.01%	1,791	0.01%			5,210	0.02%	5,210	0.02%		
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	9	0.00%	9	0.00%			12	0.00%	12	0.00%		
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	6,473,144	20.63%	6,449,279	20.55%	23,865	0.08%	6,510,377	20.74%	6,510,377	20.74%	19,429	0.06%
8	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	6,474,988	20.63%	6,451,122	20.56%	23,865	0.08%	6,516,556	20.76%	6,516,556	20.76%	19,429	0.06%

## Template 5: Taxonomy non-eligible economic activities- Stock

Row	Economic activities	Turnover		CapEx	
		HUF million	%	HUF million	%
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	14	0.00%	14	0.00%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0.00%	296	0.00%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	93	0.00%	28	0.00%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4,836	0.02%	717	0.00%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	701	0.00%	712	0.00%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	9	0.00%	8	0.00%
7	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	24,793,025	79.00%	24,683,450	78.65%
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	24,798,684	79.02%	24,685,224	78.65%

**Template 1: Nuclear and fossil gas related activities- Flow**

Row	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

## Template 2: Taxonomy-aligned economic activities (denominator)- Flow

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							0	0.00%	0	0.00%		
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	10,492	0.10%	10,492	0.10%			1,559	0.01%	1,559	0.01%		
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							0	0.00%	0	0.00%		
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	22	0.00%	22	0.00%			27	0.00%	27	0.00%		
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6	0.00%	6	0.00%								
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	57,163	0.53%	57,160	0.53%	2	0.00%	97,975	0.90%	97,970	0.90%	5	0.00%
8	<b>Total applicable KPI</b>	67,682	0.62%	67,680	0.62%	2	0.00%	99,561	0.92%	99,556	0.92%	5	0.00%

## Template 3: Taxonomy-aligned economic activities (numerator)- Flow

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI												
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							0	0.00%	0	0.00%		
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	10,492	15.50%	10,492	15.50%			1,559	1.57%	1,559	1.57%		
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							0	0.00%	0	0.00%		
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	22	0.03%	22	0.03%			27	0.03%	27	0.03%		
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	6	0.01%	6	0.01%								
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	57,163	84.46%	57,160	84.46%	2	100.00%	97,975	98.41%	97,970	98.41%	5	100.00%
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	67,682	100.00%	67,680	100.00%	2	100.00%	99,561	100.00%	99,556	100.00%	5	100.00%

## Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities- Flow

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0.00%	4	0.00%								
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%			14	0.00%	14	0.00%		
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0.00%	2	0.00%			489	0.00%	489	0.00%		
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,167	0.01%	1,167	0.01%			4,298	0.04%	4,298	0.04%		
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							0	0.00%	0	0.00%		
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	1,868,229	17.21%	1,866,567	17.20%	1,662	0.02%	1,887,911	17.39%	1,885,831	17.37%	2,080	0.02%
8	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	1,869,402	17.22%	1,867,740	17.21%	1,662	0.02%	1,892,713	17.44%	1,890,633	17.42%	2,080	0.02%

## Template 5: Taxonomy non-eligible economic activities- Flow

Row	Economic activities	Turnover		CapEx	
		HUF million	%	HUF million	%
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%		
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI			2	0.00%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.00%	0	0.00%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,924	0.03%	370	0.00%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%		
7	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	8,914,303	82.13%	8,861,667	81.64%
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	8,917,229	82.15%	8,862,039	81.65%

**Restatement of data of 2024 financial year on nuclear energy and fossil gas activities published in the 2024 Financial Report are published below:**

The method for calculating data has not been modified; the new approach reflected in the 2025 report pertains only to the implementation of information specified in the Delegated Act. Previously, the reference base for the percentage statement of the values in row 8 was the exposure in that row (100%), while the new method uses the GAR total value specified in the bank's taxonomy report as the reference base, with the exception of template 3. In addition, the methodological refinement also results some changes in other rows of Tables 2 and 3, as exposures under the new approach do not refer to the client's total exposure, but to taxonomy aligned exposure. The purpose of the change is to ensure that the percentage indicators better reflect the structure of the relevant legislation and are more comparable and understandable to external stakeholders. Data for stock tables for T-1 period have been recalculated using the new and old approach to ensure comparability between periods. The columns with the updated values are marked with \* in T-1 tables under new approach.

New approach

**Template 1: Nuclear and fossil gas related activities (T-1)- Stock**

Row	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

## Template 2: Taxonomy-aligned economic activities (denominator) (T-1)- Stock\*

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%			0	0.00%	0	0.00%		
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%			0	0.00%	0	0.00%		
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	566	0.00%	566	0.00%			3,282	0.01%	3,282	0.01%		
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							4	0.00%	4	0.00%		
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%		
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	29,797	0.10%	29,778	0.10%	18	0.00%	77,133	0.27%	77,096	0.27%	38	0.00%
8	<b>Total applicable KPI</b>	30,363	0.10%	30,345	0.10%	18	0.00%	80,419	0.28%	80,382	0.28%	38	0.00%

\*The data in the table are reported in line with the bank's new approach.

## Template 3: Taxonomy-aligned economic activities (numerator) (T-1)- Stock\*

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.00%	0	0.00%			0	0.00%	0	0.00%		
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.00%	0	0.00%			0	0.00%	0	0.00%		
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	566	1.87%	566	1.87%			3,282	4.08%	3,282	4.08%		
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							4	0.00%	4	0.00%		
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.00%	0	0.00%	0	0.01%	0	0.00%	0	0.00%		
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI												
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	29,797	98.13%	29,778	98.13%	18	99.99%	77,133	95.91%	77,096	95.91%	38	100.00%
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	30,363	100.00%	30,345	100.00%	18	100.00%	80,419	100.00%	80,382	100.00%	38	100.00%

\*The data in the table are reported in line with the bank's new approach.

## Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities T-1- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%*	HUF million	%*	HUF million	%*	HUF million	%*	HUF million	%*	HUF million	%*
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%			0	0.00%	0	0.00%		
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7	0.00%	7	0.00%								
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	132	0.00%	132	0.00%			15	0.00%	15	0.00%		
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	14	0.00%	14	0.00%			299	0.00%	299	0.00%		
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	304	0.00%	304	0.00%	0	0.00%	231	0.00%	231	0.00%		
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0.00%	2	0.00%								
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**</b>	5,000,976	17.22%	5,000,275	17.21%	700	0.00%	5,002,927	17.22%	5,002,660	17.22%	267	0.00%
8	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**</b>	5,001,435	17.22%	5,000,735	17.22%	700	0.00%	5,003,472	17.23%	5,003,206	17.22%	267	0.00%

\*The data in the column are reported in line with the bank's new approach.

\*\*The data marked with an \*\* in the table have been recalculated, as non-EU household exposures have been included in the GAR report.

## Template 5: Taxonomy non-eligible economic activities (T-1)- Stock

Row	Economic activities	Turnover		CapEx	
		HUF million	%*	HUF million	%*
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,289	0.00%		
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	9	0.00%	23	0.00%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0.00%		
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,926	0.01%	707	0.00%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.00%	1	0.00%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI				
7	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**</b>	24,011,602	82.66%	23,963,008	82.50%
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**</b>	24,015,832	82.68%	23,963,739	82.50%

\*The data in the column are reported in line with the bank's new approach.

\*\*The data marked with an \*\* in the table have been recalculated, as non-EU household exposures have been included in the GAR report.

## Old approach

The data on nuclear energy and fossil gas activities, published in the 2024 Financial Report under the bank's previous approach, are presented below:

**Template 1: Nuclear and fossil gas related activities (T-1)- Stock**

Row	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

## Template 2: Taxonomy-aligned economic activities (denominator) (T-1)- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0				0	0.00%	0			
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0				0	0.00%	0			
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,752	0.01%	2,752				5,915	0.02%	5,915			
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI							243	0.00%	243			
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0.00%	2		2		2	0.00%	2			
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI												
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	29,044,874	99.99%					29,041,469	99.98%				
8	<b>Total applicable KPI</b>	29,047,630	100.00%					29,047,630	100.00%				

## Template 3: Taxonomy-aligned economic activities (numerator) (T-1)- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.00%	0				0	0.00%	0			
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.00%	0									
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2,451	8.07%	2,451				5,791	7.20%	5,791			
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							0	0.00%	0			
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.00%	0		0		0	0.00%	0			
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI							1	0.00%	1			
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	27,911	91.92%					74,627	92.80%				
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	30,363	100.00%					80,419	100.00%				

## Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities T-1- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0				0	0.00%	0			
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7	0.00%	7									
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	132	0.00%	132				15	0.00%	15			
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	14	0.00%	14				299	0.01%	299			
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	304	0.01%	304		0		231	0.01%	231			
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2	0.00%	2									
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	3,920,170	99.99%					3,922,120	99.99%				
8	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	3,920,629	100.00%					3,922,666	100.00%				

**Template 5: Taxonomy non-eligible economic activities (T-1)- Stock**

Row	Economic activities	Turnover		CapEx	
		HUF million	%	HUF million	%
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,289	0.01%		0.00%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	9	0.00%	23	0.00%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5	0.00%		0.00%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2,926	0.01%	707	0.00%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.00%	1	0.00%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		0.00%		0.00%
7	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	25,092,408	99.98%	25,043,814	100.00%
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	25,096,638	100.00%	25,044,545	100.00%

**Independent report published by OTP Fund Manager**

The following is the mandatory report for OTP Fund Manager. The report also includes data of the Fund Manager's EU subsidiaries<sup>59</sup>.

Reference date: 31 December 2025

		<i>HUF million</i>
The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:		
Turnover-based:	<b>1.87%</b>	<b>47,482</b>
CapEx-based:	<b>2.98%</b>	<b>75,802</b>
The percentage of assets covered by the KPI relative to total investments (total AuM). Excluding investments in sovereign entities.		
Coverage ratio:	<b>51.35%</b>	<b>2,543,329</b>
<b>Additional, complementary disclosures: breakdown of denominator of the KPI</b>		
The percentage of derivatives relative to total assets covered by the KPI.	-	-
The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		
For non-financial undertakings:	<b>7.54%</b>	<b>191,885</b>
For financial undertakings:	<b>3.40%</b>	<b>86,589</b>
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		
For non-financial undertakings:	<b>9.93%</b>	<b>252,566</b>
For financial undertakings:	<b>6.87%</b>	<b>174,604</b>
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		
For non-financial undertakings:	<b>22.66%</b>	<b>576,227</b>
For financial undertakings:	<b>15.78%</b>	<b>401,242</b>
The proportion of exposures to other counterparties and assets over total assets covered by the KPI:	<b>33.82%</b>	<b>860,216</b>
The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI:	<b>89.00%</b>	<b>2,263,680</b>
The value of all the investments that are funding taxonomy eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI:	<b>8.02%</b>	<b>204,018</b>

<sup>59</sup> DSK Asset Management EAD, LLC AMC OTP Capital, OTP Invest d.o.o.

<b>Additional, complementary disclosures: breakdown of denominator of the KPI</b>			
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:		For non-financial undertakings:	
Turnover-based:	1.62%	Turnover-based:	41,144
Capital expenditures-based:	2.69%	Capital expenditures-based:	68,418
For financial undertakings		For financial undertakings:	
Turnover-based:	0.19%	Turnover-based:	4,918
Capital expenditures-based:	0.24%	Capital expenditures-based:	6,226
The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to other counterparties and assets:	
Turnover-based:	0.06%	Turnover-based:	1,420
Capital expenditures-based:	0.05%	Capital expenditures-based:	1,158

<b>Breakdown of the numerator of the KPI per environmental objective</b>			
<b>Taxonomy-aligned activities:</b>			
<b>1. Climate change mitigation</b>			
Aligned total:	Turnover:	1.74%	44,129
	CAPEX:	2.83%	71,901
Transitional activities:	Turnover:	0.20%	5,010
	CAPEX:	0.31%	7,881
Enabling activities:	Turnover:	1.05%	26,688
	CAPEX:	1.68%	42,691
<b>2. Climate change adaptation</b>			
Aligned total:	Turnover:	0.13%	3,353
	CAPEX:	0.15%	3,901
Enabling activities:	Turnover:	0.11%	2,923
	CAPEX:	0.13%	3,381
<b>3. The sustainable use and protection of water and marine resources</b>			
Enabling activities:	Turnover:	0.00%	0
	CAPEX:	0.00%	0
<b>4. The transition to a circular economy</b>			
Enabling activities:	Turnover:	0.01%	369
	CAPEX:	0.00%	58
<b>5. Pollution prevention and control</b>			
Enabling activities:	Turnover:	0.00%	0
	CAPEX:	0.00%	0
<b>6. The protection and restoration of biodiversity and ecosystems</b>			
Enabling activities:	Turnover:	0.00%	0
	CAPEX:	0.00%	0

**OTP Fund Management publishes the following report for the financial year 2024**

Reference date: 31 December 2024\*

	<i>in HUF million</i>
The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:	The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with following weights for investments in undertakings per below:
Turnover-based: <b>0.70%</b>	Turnover-based: <b>23,777</b>
CapEx-based: <b>1.41%</b>	CapEx-based: <b>47,647</b>
The percentage of assets covered by the KPI relative to total investments (total AuM). Excluding investments in sovereign entities.	The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.
Coverage ratio: <b>73.64%</b>	Coverage: <b>3,378,557</b>
<b>Additional, complementary disclosures: breakdown of denominator of the KPI</b>	
The percentage of derivatives relative to total assets covered by the KPI.	The value in monetary amounts of derivatives:
-	-
The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: <b>7.83%</b>	For non-financial undertakings: <b>264,635</b>
For financial undertakings: <b>3.66%</b>	For financial undertakings: <b>123,602</b>
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: <b>9.51%</b>	For non-financial undertakings: <b>321,422</b>
For financial undertakings: <b>1.94%</b>	For financial undertakings: <b>65,619</b>
The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:
For non-financial undertakings: <b>9.88%</b>	For non-financial undertakings: <b>333,652</b>
For financial undertakings: <b>6.41%</b>	For financial undertakings: <b>216,430</b>
The proportion of exposures to other counterparties and assets over total assets covered by the KPI: <b>60.77%</b>	Value of exposures to other counterparties and assets <b>2,053,197</b>
The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI: <b>96.28%</b>	The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI: <b>3,252,713</b>
The value of all the investments that are funding taxonomy eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI: <b>3.03%</b>	Value of all the investments that are funding Taxonomy-eligible economic activities, but not taxonomy-aligned: <b>102,379</b>

<b>Additional, complementary disclosures: breakdown of denominator of the KPI</b>			
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:		For non-financial undertakings:	
Turnover-based:	<b>0.62%</b>	Turnover-based:	<b>21,086</b>
Capital expenditures-based:	<b>1.30%</b>	Capital expenditures-based:	<b>43,812</b>
For financial undertakings		For financial undertakings	
Turnover-based:	<b>0.05%</b>	Turnover-based:	<b>1,535</b>
Capital expenditures-based:	<b>0.06%</b>	Capital expenditures-based:	<b>1,975</b>
The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to other counterparties and assets:	
Turnover-based:	<b>0.00%</b>	Turnover-based:	<b>0</b>
Capital expenditures-based:	<b>0.00%</b>	Capital expenditures-based:	<b>0</b>

\* The EU Taxonomy tables of OTP Fund Management have been restated for the year 2024 due to corrections made to previously used client data

<b>Breakdown of the numerator of the KPI per environmental objective</b>			
<b>Taxonomy-aligned activities*:</b>			
<b>1. Climate change mitigation</b>			
Aligned total:	Turnover:	<b>0.66%</b>	Turnover:
	CAPEX:	<b>1.34%</b>	CAPEX:
Transitional activities:	Turnover:	<b>0.05%</b>	Turnover:
	CAPEX:	<b>0.18%</b>	CAPEX:
Enabling activities	Turnover:	<b>0.43%</b>	Turnover:
	CAPEX:	<b>0.75%</b>	CAPEX:
<b>2. Climate change adaptation</b>			
Aligned total:	Turnover:	<b>0.04%</b>	Turnover:
	CAPEX:	<b>0.07%</b>	CAPEX:
Enabling activities:	Turnover:	<b>0.04%</b>	Turnover:
	CAPEX:	<b>0.03%</b>	CAPEX:
<b>3. The sustainable use and protection of water and marine resources</b>			
Enabling activities	Turnover:	<b>0.00%</b>	Turnover:
	CAPEX:	<b>0.00%</b>	CAPEX:
<b>4. The transition to a circular economy</b>			
Enabling activities	Turnover:	<b>0.01%</b>	Turnover:
	CAPEX:	<b>0.00%</b>	CAPEX:
<b>5. Pollution prevention and control</b>			
Enabling activities	Turnover:	<b>0.00%</b>	Turnover:
	CAPEX:	<b>0.00%</b>	CAPEX:
<b>6. The protection and restoration of biodiversity and ecosystems</b>			
Enabling activities	Turnover:	<b>0.00%</b>	Turnover:
	CAPEX:	<b>0.00%</b>	CAPEX:

**Previous approach for 2024:**

	<i>in HUF million</i>
The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:	The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with following weights for investments in undertakings per below:
Turnover-based: <b>0.80%</b>	Turnover-based: <b>22,290</b>
CapEx-based: <b>1.66%</b>	CapEx-based: <b>45,959</b>
The percentage of assets covered by the KPI relative to total investments (total AuM). Excluding investments in sovereign entities,	The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.
Coverage ratio: <b>63.87%</b>	Coverage: <b>2,776,316</b>
<b>Additional, complementary disclosures: breakdown of denominator of the KPI</b>	
The percentage of derivatives relative to total assets covered by the KPI.	The value in monetary amounts of derivatives:
-	-
The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: <b>1.39%</b>	For non-financial undertakings: <b>38,685</b>
For financial undertakings: <b>4.95%</b>	For financial undertakings: <b>137,523</b>
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: <b>39.90%</b>	For non-financial undertakings: <b>1,107,738</b>
For financial undertakings: <b>24.89%</b>	For financial undertakings: <b>691,142</b>
The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:
For non-financial undertakings: <b>7.24%</b>	For non-financial undertakings: <b>201,019</b>
For financial undertakings: <b>11.19%</b>	For financial undertakings: <b>310,588</b>
The proportion of exposures to other counterparties and assets over total assets covered by the KPI:	Value of exposures to other counterparties and assets
<b>10.43%</b>	<b>289,622</b>
The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI:	The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI:
<b>87.53%</b>	<b>2,430,102</b>
The value of all the investments that are funding taxonomy-eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI:	Value of all the investments that are funding Taxonomy-eligible economic activities, but not taxonomy-aligned:
<b>7.62%</b>	<b>211,491</b>
<b>Additional, complementary disclosures: breakdown of numerator of the KPI</b>	
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:
For non-financial undertakings: Turnover-based <b>0.68%</b>	For non-financial undertakings: Turnover-based <b>18,755</b>
Capital expenditures-based: <b>1.47%</b>	Capital expenditures-based: <b>40,872</b>
For financial undertakings Turnover-based <b>0.00%</b>	For financial undertakings Turnover-based: <b>1</b>
Capital expenditures-based: <b>0.00%</b>	Capital expenditures-based: <b>9</b>

		<i>in HUF million</i>	
The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to other counterparties and assets:	
Turnover-based:	<b>0.13%</b>	Turnover-based:	<b>3,526</b>
Capital expenditures-based:	<b>0.18%</b>	Capital expenditures-based:	<b>5,079</b>

Breakdown of the numerator of the KPI per environmental objective			
Taxonomy-aligned activities:			
<b>1. Climate change mitigation</b>			
Enabling activities:	Turnover:	<b>0.06%</b>	Turnover: <b>1,552</b>
	CAPEX:	<b>0.19%</b>	CAPEX: <b>5,363</b>
Enabling activities:	Turnover:	<b>0.46%</b>	Turnover: <b>12,899</b>
	CAPEX:	<b>0.82%</b>	CAPEX: <b>22,635</b>
<b>2. Climate change adaptation</b>			
Transitional activities:	Turnover:	<b>0.00%</b>	Turnover: <b>5</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>3</b>
Enabling activities:	Turnover:	<b>0.05%</b>	Turnover: <b>1,262</b>
	CAPEX:	<b>0.05%</b>	CAPEX: <b>1,331</b>
<b>3. The sustainable use and protection of water and marine resources</b>			
Transitional activities:	Turnover:	<b>0.00%</b>	Turnover: <b>11</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>26</b>
Enabling activities:	Turnover:	<b>0.00%</b>	Turnover: <b>26</b>
	CAPEX:	<b>0.01%</b>	CAPEX: <b>142</b>
<b>4. The transition to a circular economy</b>			
Transitional activities:	Turnover:	<b>0.00%</b>	Turnover: <b>112</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>27</b>
Enabling activities:	Turnover:	<b>0.00%</b>	Turnover: <b>73</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>24</b>
<b>5. Pollution prevention and control</b>			
Transitional activities:	Turnover:	<b>0.00%</b>	Turnover: <b>21</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>1</b>
Enabling activities:	Turnover:	<b>0.00%</b>	Turnover: <b>1</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>1</b>
<b>6. The protection and restoration of biodiversity and ecosystems</b>			
Transitional activities:	Turnover:	<b>0.00%</b>	Turnover: <b>0</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>2</b>
Enabling activities:	Turnover:	<b>0.00%</b>	Turnover: <b>0</b>
	CAPEX:	<b>0.00%</b>	CAPEX: <b>0</b>

## Additional disclosure: Mandatory templates for Nuclear Energy and Fossil gas-related activities

### Template 2: Taxonomy-aligned economic activities (denominator)- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	2	0.00%	2	0.00%	0	0.00%	579	0.02%	578	0.02%	0	0.00%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	5,006	0.20%	5,006	0.20%	0	0.00%	2,925	0.12%	2,925	0.12%	0	0.00%
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	3,551	0.14%	172	0.01%	3,379	0.13%	3,934	0.15%	48	0.00%	3,886	0.15%
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	111	0.00%	110	0.00%	0	0.00%	16	0.00%	27	0.00%	0	0.00%
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	2	0.00%	2	0.00%	0	0.00%	34	0.13%	34	0.00%	0	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	63,276	2.49%	34,306	1.35%	28,970	1.14%	71,518	2.81%	47,309	1.86%	24,209	0.95%
8	<b>Total applicable KPI</b>	144,914	5.70%	112,144	4.41%	32,770	1.29%	170,324	6.70%	112,780	4.43%	57,544	2.26%

## Template 3: Taxonomy-aligned economic activities (numerator)- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	0	0.00%	0	0.01%	0	0.00%	5	0.00%	5	0.01%	0	0.00%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	1	0.00%	1	0.00%	0	0.00%	38	0.00%	38	0.05%	0	0.00%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	338	0.01%	338	0.77%	0	0.00%	336.90	0.01%	337	0.47%	0	0.00%
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	11	0.00%	6	0.01%	4	0.13%	13	0.00%	7	0.01%	6	0.15%
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	6	0.00%	6	0.01%	0	0.00%	4	0.00%	4	0.00%	0	0.00%
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	1	0.00%	1	0.00%	0	0.00%	5	0.00%	5	0.01%	0	0.00%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	47,126	99.99%	43,778	99.20%	3,348	99.86%	75,400	99.99%	71,506	99.45%	3,895	100.00%
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	47,482	100.00%	44,129	100.00%	3,353	100.00%	75,802	100.00%	71,901	100.00%	3,901	100.00%

## Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities- Stock

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - Turnover						Amount and proportion (the information is to be presented in monetary amounts and as percentages) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%	HUF million	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	85	0.00%	85	0.00%	0	0.00%	10	0.00%	10	0.00%	0	0.00%
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	171	0.01%	171	0.01%	0	0.00%	281	0.01%	281	0.01%	0	0.00%
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7,025	0.28%	5,420	0.21%	1,605	0.06%	9,250	0.36%	6,784	0.27%	2,467	0.10%
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	9,489	0.37%	9,436	0.37%	53	0.00%	4,007	0.16%	4,007	0.16%	0	0.00%
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	199	0.01%	158	0.01%	41	0.00%	125	0.00%	125	0.00%	0	0.00%
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	148,693	5.85%	117,873	4.63%	30,820	1.21%	147,552	5.80%	121,265	4.77%	26,287	1.03%
8	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	153,026	6.02%	131,435	5.17%	21,592	0.85%	155,643	6.12%	133,640	5.25%	22,003	0.87%

**Template 5: Taxonomy non-eligible economic activities- Stock**

Row	Economic activities	Turnover		CapEx	
		HUF million	%	HUF million	%
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	14	0.00%	2	0.00%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	77	0.00%	2,179	0.09%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	424	0.02%	159	0.01%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	838	0.03%	260	0.01%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7	0.00%	9	0.00%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0.00%	2	0.00%
7	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>2,133,477</b>	<b>83.89%</b>	<b>2,122,665</b>	<b>83.46%</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	<b>2,135,048</b>	<b>83.95%</b>	<b>2,125,541</b>	<b>83.57%</b>

**Contextual information in support of the quantitative indicators including the scope of assets and activities covered by the KPIs, information on data sources and limitation.**

The KPI covers equity and bond assets held in the funds and portfolios managed by the Fund Manager and its subsidiaries. Collective investment schemes that may represent a significant share of individual portfolios were only included where the ESG service provider used by the Fund Manager (MSCI ESG Research) was able to decompose such investments into their underlying assets. Investments in government securities are excluded from the scope of the KPI.

The coverage is further limited by the fact that the data reporting obligations under Articles 19a and 29a of Directive 2013/34/EU apply only to a limited set of investee companies. As a result, for a significant portion of the investments, neither the Fund Manager nor its ESG service provider has access to usable sustainability data.

Of the HUF 4,933,844 million assets under management of the Fund Manager and its subsidiaries, more than 93% consisted of direct investments. Government securities accounted for approximately 47.79% of total assets, while sustainability and emissions-related information was not available for around 18% of the directly managed assets. Indirect investments represented on average more than 6% of the portfolio, with an average data coverage of 88.2%. Based on these factors, the overall coverage of the GAR indicator calculated by the Fund Manager amounted to 51.35%.

With regard to economic activities, in the current reporting period full coverage was achieved only for activities related to climate change mitigation and climate change adaptation. For activities related to the sustainable use and protection of water and marine resources, the transition to a circular economy, and pollution prevention and control, data were provided exclusively by non-financial undertakings.

In calculating the KPI, the Fund Manager relied solely on data provided by its ESG service provider (MSCI ESG Research). No other external ESG data providers were used, and no proprietary data collection was carried out.

Due to limitations in the data available from the ESG service provider, a full breakdown of the KPI numerator was not possible. As a result, the aggregated value of investments related to taxonomy-aligned economic activities calculated on both a turnover and a CapEx basis exceeds the aggregated values broken down by environmental objectives. This difference may also be attributable to inconsistencies in the KPIs reported by non-financial companies across individual environmental objectives.

Regarding the evolution of the GAR indicator over time, it should be noted that the significant increase in the nominal value and relative share of government securities within the assets under management led to a substantial decrease in coverage, amounting to nearly 25 percentage points.

The calculated GAR indicator increased from 0.7% to 1.9% on a turnover basis, and from 1.4% to 2.98% on a CapEx basis.

OTP Fund Management does not have a general, overarching objective applicable to all taxonomy-aligned economic activities across its asset management operations. However, when assessing the sustainability of individual investments, the Fund Manager takes into account their impact on environmental objectives, with particular focus on greenhouse gas emissions, waste and pollutant emissions, and water stress. Consequently, the evolution of taxonomy-aligned economic activities over time — apart from a limited number of dedicated funds with negligible overall weight — cannot be explained by investment decision-making processes, but is primarily driven by methodological considerations, data quality issues, and changes in data coverage.

**The Asset Manager has specific environmental targets in place for the SFDR-classified funds under its management, as set out below**

**OTP Climate Change Fund**

The OTP Climate Change Fund integrates sustainability considerations into its investment decision-making by placing primary emphasis on the mitigation of climate change. The achievement of environmental objectives is assessed through SDG alignment indicators that measure contributions to the United Nations Sustainable Development Goals (SDGs), with particular focus on SDG 7 (“Affordable and Clean Energy”), SDG 12 (“Responsible Consumption and Production”) and SDG 13 (“Climate Action”). The SDG alignment of individual portfolio holdings is measured based on the services provided by MSCI ESG Research.

The Fund also evaluates climate-related performance through turnover-based and CapEx-based indicators in accordance with the EU Taxonomy. These indicators reflect the extent to which the current activities and capital investments of investee companies contribute to environmental objectives. The proportion of sustainable investments provides additional feedback on the environmental and social performance of the portfolio. As a complementary indicator, the Fund also reviews the distribution of ESG ratings, with the requirement that no individual investment may fall within the lowest 25% of ESG ratings at either the E, S or G pillar level or on an overall basis.

The Fund's sustainable investments primarily contribute to climate protection through investments in companies that have long-term sustainability strategies, publicly disclosed net-zero commitments, and regular progress reporting. These investments finance economic activities such as renewable energy generation, energy efficiency improvements and solutions related to the circular economy. In the case of equity or general bond investments, the contribution to sustainability objectives is indirect, while green and sustainability-linked bonds provide a direct link to the financing of sustainable projects. At least 80% of the Fund's assets are invested in instruments that promote environmental or social characteristics. Within this share, a significant portion of the portfolio — at least 51% — qualifies as sustainable investments, of which a minimum of 10% are environmentally sustainable investments aligned with the EU Taxonomy. At least 70% of the equity portfolio must consist of shares in companies whose activities contribute to environmental sustainability and that hold appropriate ESG ratings. A good ESG rating is defined as MSCI ratings between AAA and BBB for developed market companies, and between AAA and BB for emerging market companies.

The investment strategy starts from the universe of companies included in the reference indices, which have already undergone ESG screening and exclude companies deriving more than 5% of their revenue from arms manufacturing or tobacco-related activities. The narrowed investment universe may also include companies that are not part of the reference indices but demonstrate relevant sustainability performance based on their activities. Companies without an ESG rating may be included with a limited weight if they hold a leading sustainability position within their industry. To ensure risk management and ethical standards, companies deriving more than 50% of their revenue from oil, natural gas or coal extraction are excluded from the investment universe.

The Fund's primary objective is to mitigate climate change and to support adaptation to climate change. In line with Article 16 of the Taxonomy Regulation, the Fund invests in companies whose products and services directly support the climate transition of other companies. While the Fund does not have an independent sustainability objective, it commits to allocating at least 51% of its investments to sustainable investments, including at least 10% to environmentally sustainable investments aligned with the EU Taxonomy.

### **OTP Omega Fund of Funds**

In line with the fund-of-funds structure, the Fund invests in other actively and passively managed funds. An ESG rating is published by the research advisor (MSCI) for certain underlying funds, while for others such a rating is not available. This depends partly on the business considerations of the ESG service provider and partly on the business considerations of the individual fund managers.

The Fund does not have a sustainability objective; however, it commits to investing at least 51% of its assets in sustainable investments. Within this commitment, the Fund does not undertake to invest in taxonomy-aligned environmentally sustainable investments.

### **OTP Ecotrend Fund**

The Fund seeks to promote environmental characteristics primarily through its bond portfolio. The Fund plans to invest partly in green government bonds intended to finance or refinance expenditures that support the transition to a low-carbon, climate-resilient and environmentally sustainable economy. As a result, such investments fall within one of the following six green sectors: renewable energy, energy efficiency, waste and water management, land use and the use of living natural resources, clean transport, and adaptation.

The Fund does not have a sustainability objective, nor does it have a commitment to a minimum proportion of sustainable investments.

The KPI data calculated by the Fund Manager for the year 2025 and its breakdown compared to the year 2024 have changed as a result of changes in portfolio composition, coverage and the expansion of available data. The Fund Manager did not assess the individual effects of the underlying change factors, and no trend regarding the changes can be determined based on data from two years alone.

OTP Fund Management is committed to taking sustainability risks into account in its investment decision-making and to continuously increasing the number of SFDR-classified products that invest a significant proportion of their assets in sustainable investments.

For funds and portfolios that have a commitment to sustainable investment under the Taxonomy Regulation, EU Taxonomy DNSH indicators are taken into account, in addition to the sustainability indicator calculated by the ESG data provider selected by the Fund Manager, in line with the specific commitment of the relevant fund or portfolio.

The Fund Manager currently has one fund (the OTP Climate Change Fund) for which, at the end of 2023, it committed that at least 10% of investments (calculated on a CapEx basis) would be aligned with the EU Taxonomy. The commitment and its level were determined by the portfolio managers managing the fund in consultation with the risk management function and the ESG advisor engaged by the Fund Manager. As of 31 December 2025, the achieved ratio was 23%. The Fund Manager monitors the fulfilment of this commitment on a monthly basis through reporting based on data available from MSCI ESG Manager.

With respect to the OTP Climate Change Fund, the Fund Manager also considers the adverse sustainability impacts of its investment decisions and applies the exclusion list used across all its funds, which covers issuers involved in alcohol-related activities, gambling, and issuers associated with authoritarian regimes.

Further details on the related commitments and their fulfilment are available on the Fund Manager's sustainability disclosure website ([OTP Fund Management – Sustainability](#)) and on the [sustainability disclosure page](#) of the Fund.

## 3 Social information

### 3.1 [S1] Own workforce

OTP Group employees are key drivers of long-term success, since business achievements strongly rely on their expertise and commitment. The Group, as a responsible employer, is committed to provide supportive and inclusive work environment that promotes employee well-being, diversity, professional development and personal growth.

#### 3.1.1 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

OTP Group's strategic approach regarding own employees is focusing on capabilities, culture, and capacity development, with the objective of positioning the bank as employee's first choice. The key pillars of HR related initiatives are:

- **Commitment and Talent Management:** For the past five years, group-level employee engagement surveys have been conducted with high participation rates, supporting talent retention and sustaining competitive advantage. The engagement model is shaped by strategic, cultural, and customer experience considerations.
- **Digital Capability Development:** Strengthening digital competencies is essential to maintaining competitiveness, with a focus on mastering AI, data management, cloud technologies, and low-code solutions. Training programs and leadership initiatives support adaptation to the digital environment.
- **Compensation and Ethics:** The compensation policy is comprehensive, encompassing more than 30 benefit elements, a strong social package, and secure employment. Ethical priorities include ensuring equal opportunities and addressing generational differences, complemented by active engagement with trade unions.

Based on these group-level principles subsidiaries develop and adjust their individual HR strategies on a yearly basis to reflect the results of employee engagement survey and key local challenges.

As a regional employer in Central and Eastern Europe, OTP Group has a diverse workforce across its operational countries. It includes employees who have direct employment contract with one of the Group's subsidiaries, and non-employees who regularly perform specific tasks under third-party contractual arrangements, while not directly employed by the Group (e.g. sole traders, tied sales agents, temporary agency workers). The majority of own employees work in an office environment, holding various positions such as administrative, functional, expert, managerial and executive roles. Further characteristics of own employees are presented in [S1-6] subchapter.

OTP Group's own workforce (mostly internal - own employees, over whom the Group has material influence) were considered in the double materiality analysis and are included in the scope of disclosures. Since the Group's influence on external (non-employee – S1-7 indicator) employees is more limited, that part of the own workforce was covered only to limited extent in reporting this year (data collection for non-employees [S1-7] is not performed in the reporting year, due to phase-in implementation, while tied sales agents employment was considered under S4 and G1 subtopics' risks in the DMA assessment).

OTP Group has identified the following positive impacts, risks and opportunities in relation to its own workforce, no material negative impacts were identified in the double materiality assessment.

The Group considered all employees within its own workforce as affected stakeholders. During the DMA process, they were reviewed across operational segments, and no specific sub-groups were defined.

**S1 - OWN WORKFORCE**

Material sustainability matters	Identified IRO (category: (+/-) I: positive/negative impact, R: risk, O: opportunity, name and description)		
Own operations - Financial services			
<b>Secure employment</b>	(+) I	<i>Secure employment</i>	OTP Group is a significant employer in the financial and insurance sector in Hungary and the CEE region, thus its operation is important for providing working opportunities primarily for white-collar workers and contracted partners.
	O	<i>Employee benefits</i>	Adequate working conditions with a wide range of employee benefits ensure that employees retain their position, which helps reduce operational costs related to turnover. A safe and supportive workplace also enhances employees' productivity.
<b>Adequate wages</b>	(+) I	<i>Adequate wages</i>	By offering a competitive salary the Group can increase the life standard of employees and their families in light of national economic and social conditions.
	R	<i>Non-adequate wages</i>	Inadequate wages (below the living wage or not aligned with market expectations) have negative effects on turnover and performance and can lead to higher operational costs.
<b>Social dialogue</b>	R	<i>Inadequate employee involvement</i>	By ignoring views and interests of employees or their representatives and refusing their involvement in decision-making processes can demotivate employees and decrease productivity and employee satisfaction and ultimately lead to higher operational costs.
<b>Gender equality and equal pay for work of equal value</b>	O	<i>Gender equality and equal pay for work of equal value</i>	Providing equal opportunities fosters employee motivation, collaboration and well-being, by creating an inclusive and innovative workplace, based on employees' skills and knowledge with equal rights.
<b>Training and skills development</b>	O	<i>Training and skills development</i>	Dedicated training and skills development are important to improve working processes, increase operational efficiency and implement new technologies, while personal development can create a better working environment and collaboration among employees. By offering proper training and development opportunities, OTP Group can attract and retain talented employees and improve employees' motivation, which in turn could result work efficiency and cost reduction
	R	<i>Insufficient training and skills development</i>	A lack of proper knowledge development initiatives can lead to competitive disadvantages, such as missed opportunities in professional growth, reduced market presence, and the loss of talented, well-qualified employees, ultimately, which ultimately generate additional operational costs.
<b>Measures against violence and harassment in the workplace</b>	(+) I	<i>Measures against violence and harassment in the workplace</i>	Continuous awareness-raising and employee education on ethical standards foster a diverse, inclusive corporate culture, which can inspire other employers to adopt similar practices, thus having a broader positive impact on society.
<b>Diversity</b>	O	<i>Diversity</i>	Actively supporting diversity and inclusion can enhance employee satisfaction, well-being, and organizational effectiveness. OTP Group can motivate employees, foster innovation, which in turn could result work efficiency, cost reduction and contribute to long-term business and financial success.
Own operations - Agricultural activities			
<b>Adequate wages</b>	R	<i>Non-adequate wages</i>	Inadequate wages (below the regional and market standards) have negative effects on employee availability, turnover and performance, which can increase related operational costs.

OTP Group's transition plan is in development phase, related potential impacts on own workforce were not examined yet.

OTP Group has not identified any significant risk of incidents of forced labour, compulsory labour, or child labour within its own workforce. The majority of its subsidiaries operate in the European Union, while non-EU subsidiaries are required to follow conventions of EU based legislative standards governing business relationships, which prohibit these forms of employment. Besides, the Group's Code of Ethics explicitly prohibits any form of forced or child labour.

### 3.1.2 [S1-1] Policies related to own workforce

OTP Group has multiple policies, operative instructions in place, which aims to guide and control ethical principles, HR procedures and employee related matters within the organization. The Group’s core policies, that relate to the management of identified material impacts, risks and opportunities for own workforce, are Code of Ethics, Partner Code of Ethics, Remuneration Policy, Training policies, Inclusion and diversity policies, that are related to the Group’s financial segment and further described in the table below. These policies are publicly available on OTP Group’s website and provided internally for employees in OTP’s intranet and training sessions with supplemental operative instructions. HR and compliance departments are core internal functions to represent employee’s rights and interest in policy development. For the agricultural segment, the subsidiaries currently do not have dedicated policies addressing the identified risks across their operation. Their operational perspective adheres to applicable legal requirements and regulations, ensuring that their operation is in alignment with Hungarian labour law.

#### Summary table of main policies in relation to material IROs:

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Code of Ethics</b>				
<i>Secure employment</i>	The core guiding policy for OTP Group’s ethical operation, which sets out the principles and expectations for ethical business conduct. It defines OTP Group’s values, standards of ethical behaviour, including respect for human rights, equal treatment, workplace standards, fair employment, mutual respect and cooperation among employees. It also outlines commitments to business ethics such as information security, data protection, anti-corruption, and fraud prevention, as well as compliance with ethical rules and details on ethical reporting system. Conventions and sections of the Code are continuously updated to reflect change in working environment. The latest amendment was in 2025, a section was added on the responsible and ethical use of Artificial Intelligence (AI)). All OTP Group employees, both external and internal, are expected to perform their work in full compliance with ethical and professional standards.	OTP Group	Supervisory Board and Board of Directors, Ethics Committee, Supported by compliance, legal and HR departments	Code of Ethics on human rights and labour standards are guided by international frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGP). Thus, it is aligned with the human rights and labour principles of the UN Global Compact, the human rights chapter of the OECD Guidelines for Multinational Enterprises, and the core conventions of the International Labour Organization (ILO). Including among others, freedom of association, the right to collective bargaining, equal remuneration, and protection against workplace discrimination.
<i>Adequate wages</i>				
<i>Social dialogue</i>				
<i>Measures against violence and harassment in the workplace</i>				

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Partner Code of Ethics</b>				
<p><i>Secure employment</i></p> <p><i>Adequate wages</i></p> <p><i>Social dialogue</i></p> <p><i>Measures against violence and harassment in the workplace</i></p>	<p>The purpose of the Partner Code of Ethics is to provide clear and unambiguous guidelines and expectations for all parties engaged with OTP Group, ensuring ethical business conduct and safeguarding the Group's core values. OTP Group endeavours to ensure that all its suppliers, business partners, agents and other contractual partners undertake to comply with the provisions of the Partner Code of Ethics (or equivalent own regulations) by accepting the General Terms and Conditions, which form an integral part of the contract with OTP Group member.</p> <p>The policy includes core ethical principles (including among others respect of human rights, ensuring workers' rights, safe and healthy working environment), compliance with national and international laws, regulation and labour rights' standards and details on ethical reporting system.</p> <p>All OTP Group partners are expected to comply with ethical requirements of Partner Code applicable to their business activities and respective legal provisions. The Group strictly prohibits any form of human trafficking, forced labour, or child labour within its operations and supply chain.</p>	OTP Group	Supervisory Board and Board of Directors, Ethics Committee, Supported by compliance, legal and HR departments	<p>OECD Guidelines for Multinational Enterprises</p> <p>UN Global Compact</p> <p>Universal Declaration of Human Rights (UN)</p> <p>ILO Core Conventions</p> <p>ISO 26000 Guidance on Social Responsibility</p> <p>Compliance with EU and National Legislation</p>
<b>Remuneration Policy</b>				
<p><i>Adequate wages</i></p> <p><i>Gender equality and equal pay for work of equal value</i></p>	<p>The objective of Banking group's Remuneration Policy (that was revised in 2025) is, within the Group's risk-tolerance capacity, to acknowledge managers' and employees' professional contribution in achieving banking subsidiaries' results. The aim of individual institutions within the Banking group, is to provide incentive scheme to recognize their employees' valuable performance. The Remuneration Policy is gender-neutral; it is based on the principle of equal pay for men and women for equal work or work of equal value.</p> <p>The Remuneration policy provides guidance on the application and principles of basic and performance-based remuneration framework.</p>	OTP banking group	Supervisory Board and Board of Directors, Supported by compliance, legal and HR departments	<p>EBA Guidelines on Sound Remuneration Policies</p> <p>CRD V (Capital Requirements Directive V)</p> <p>ESMA Guidelines</p> <p>Shareholder Rights Directive (SRD II)</p> <p>OECD Principles of Corporate Governance</p>
<b>Training Policy</b>				
<p><i>Training and skills development</i></p>	<p>Training plans and related operative instructions are designed at subsidiaries level.</p> <p>OTP Group's overall objective is to offer a wide range of training and development programs (from leadership and professional programs, soft and hard skills training, external trainings and conferences, to online individual and group courses) which can support employees' professional development in alignment with the Group's strategic goals.</p>	OTP banking group	Supervisory Board and Board of Directors, Supported by compliance, legal and HR departments	N/A

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Strategy to create gender equality</b>				
<p><i>Diversity</i></p> <p><i>Gender equality and equal pay for work of equal value</i></p>	<p>OTP Bank's strategy is to promote diversity, gender equality and ensure an inclusive working culture. As a strategic objective, the Bank is committed to providing equal opportunities for all employee groups, creating an open and inclusive workplace free from discrimination and bias, and fostering a diverse, highly skilled, and collaborative work culture.</p> <p>The strategy is initiated by OTP Bank, while other banking subsidiaries also have developed strategic initiatives and policies to promote diversity and gender equality in their own operations (e.g.: OTP Bulgaria, OTP Slovenia, OTP Croatia and OTP Montenegro).</p> <p>The overall aim of banking subsidiaries' diversity and inclusion policies is to ensure a workplace that is free from discrimination and harassment for all employees throughout every stage of the employee lifecycle, while guiding diversity programs, and trainings.</p>	<p>OTP banking group</p>	<p>Development of programs and initiatives: respective HR, legal and compliance departments Oversight by Ethics Committee</p>	<p>UN Sustainable Development Goals (SDG 5: Gender Equality) UN Women's Empowerment Principles (WEPs) EU Gender Equality Strategy ILO Conventions on Equal Remuneration and Non-Discrimination OECD Guidelines for Multinational Enterprises</p>

The Group's human rights commitments (including the elimination of discrimination, harassment, and promoting equal opportunities) are presented in OTP Group Human Rights Statement and Code of Ethics, in alignment with the guiding principles of internationally recognized frameworks. As a financial institution and employer, OTP Group's policies and practices regarding human rights are further guided 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.

The Group is committed to upholding human rights in all areas it operates, protecting the dignity and rights of every individual at all levels of the organisation and with regards to all client and business relationships. As presented in Code of Ethics, respect for 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.

OTP Group considers unacceptable any form of discrimination, whether based on citizenship, nationality, marital status, age, sex, race, colour, gender identity, sexual orientation, political opinion, political party affiliation, religious or cultural background, origin, disability or any other personal characteristic protected by law.

The Group's commitment is to fully comply with international human rights guidelines that determine core principles and rules for that OTP Group's employees, agents and customers to be respected. The integration of human rights into business relationships is guided by relevant international standards (presented above and under third party standards) to which OTP Group adheres.

OTP Group complies with the respective laws and regulations of all countries where it conducts business. In cases of conflict with internationally recognized standards, the Group strives for the highest possible level of compliance with these standards while adhering to local laws and regulations. Internal control functions (including risk management, compliance activities and internal audit) aim to ensure legal and ethical compliance within the Group, Compliance Directorate and Internal Audit have monitoring role to support ESG governance. Besides, whistleblowing channels are in place, allowing employees and partners – also anonymously – to report human rights violations or any labour right incidents against internationally recognized standards. Mandatory, annual ethics trainings, as presented in [G1] subchapter, and public availability of Code of Ethics provide awareness on human rights principles and whistleblowing mechanism.

OTP Group provides a healthy and modern workplace in compliance with labour regulations to ensure the protection of employees' health and safety. The Group's subsidiaries have policies in place to prevent workplace accidents, which internal regulations are developed individually by Group's members in line with domestic and international regulations. In addition, the Group provides mandatory trainings on occupational health and safety, and fire protection.

### **3.1.3 [S1-2] Processes for engaging with own workforce and workers' representatives about impacts**

OTP Group uses multiple channels to engage with its own workforce on employee related matters. The most relevant processes for gathering insights and incorporating employee's perspectives into decision-making are the annual employee engagement survey and consultations with trade unions representatives. The results of these processes were considered in the DMA process by internal HR representatives and by the 2024 employee engagement survey outcomes. The methods of engagement processes comply with the EU labour law and national legislations.

#### **Employee Engagement Survey**

OTP Group conducts annual employee engagement survey that serves as main platform to collect employees' feedback on actual or potential impacts and evaluate subsidiaries' initiatives and activities that were implemented to improve working conditions, increase employee well-being, provide development opportunities and promote diversity and gender equality.

All employees of the participating subsidiaries (covering OTP Group's subsidiaries<sup>60</sup> in all operational countries) could take part in the survey, to share anonymously their opinion on work-related strategic themes (e.g.: remuneration, well-being, equal opportunities). The core areas of the survey are reflecting on the following aspects to get the overall satisfaction level of employees, based on experiences related to:

- workplace atmosphere (respectful treatment, trust in direct manager, open and honest communication, free expression of opinion and openness towards ideas, the importance of employee wellbeing for senior managers and the organization, work-life balance).
- high-performance incentives (recognition and reward of performance, constructive feedback on work, responsibility for own performance, clear roles, understandable expectations, appropriate professional knowledge, opportunity for learning/development, career prospects, attraction of professionals),
- organizational work environment (appropriate authorization, access to resources and information, sustainable workload, helpful direct manager, cooperation within the teams and between teams, effective decision-making processes, occupational health and safety protection).
- customer-centric operation and the quality of offered services/products (suitability of business processes for the satisfaction of internal and external customer needs, openness towards recommendations to increase customer satisfaction, trust in the organization's own services/products, quick adaptation to changing market needs).

Insights gained from the survey are analysed at organizational unit level, and based on these results, unit leaders prepare annual action plans in collaboration with employees. This approach aims to systematically integrate employees' feedback into decision-making processes. The results of the annual employee engagement survey (2025) are presented in [S1-5] subchapter.

OTP Bank's HR department (Human and Organization Development Directorate) coordinates the engagement process at group level, while HR departments of respective subsidiaries are responsible for the operational management of employee engagement survey, to ensure adequate stakeholder involvement and to assess the results. The Group communicates the survey's results, related action plans, and implementation procedure through internal corporate channels (intranet, internal newsletters, employee forums and meetings). The survey outcomes are reported to management through Presidential, CEO, Divisional, and Regional reports, as well as in the Executive Steering Committee report, ensuring that decision-making bodies are informed about core findings.

To have a general overview on the employee engagement effectiveness, the Group considers indicators, as employee participation ratio, absolute and relative values of core engagement indicators, as well as feedback on the implementation of action plans from the previous years.

During the engagement process with its own workforce, OTP Group considered all individuals equally and did not identify any specific group of employees as particularly vulnerable or marginalised, who might be at greater risk of harm due to the Group's activities.

OTP Group's Code of Ethics represents commitments on human rights and guiding ethical principles of all operations. Above it, the Group has no Global Framework Agreement with workers' representatives.

### **3.1.4 [S1-3] Processes to remediate negative impacts and channels for own workforce to raise concerns**

To remediate negative impacts in relation to its own workforce, OTP Group operates a whistleblowing mechanism that provides channels for their employees to raise concerns and secure complaint-handling processes. All employees (internal and external workforce) can report incidents and raise complaints in case they have observed unlawful practice, behaviour that is in contrary of ethical rules and values, or any practice that may lead to abuse.

<sup>60</sup> Including all foreign banking subsidiaries and the following Hungarian subsidiaries: Air-Invest Ltd.; CIL Babér Ltd.; FoglaljOrvost Online Ltd.; Merkantil Bank Ltd.; Merkantil Bérlet Ltd.; OTP Fund Management Ltd.; OTP Ecosystem Ltd.; OTP Life Annuity Real Estate Investment Plc.; OTP Factoring Ltd.; OTP Hungaro-Projekt Ltd.; OTP Real Estate Investment Fund Management Ltd.; OTP Real Estate Ltd; OTP Real Estate Leasing Ltd.; OTP Ingatlanpont Ltd.; OTP Mortgage Bank Ltd.; OTP Building Society Ltd.; OTP Home Solutions Ltd.; OTP Funds Servicing and Consulting Ltd.; OTP Financial Point Ltd.; OTP Travel Ltd.; PortfoLion Ltd.; SimplePay Ltd.

Employees can report either directly to their managers, by email or by phone to the Compliance Directorate of OTP Bank or compliance area of OTP Group members, or online via the ethics and whistleblowing platform. Reports can also be submitted anonymously. Issues raised through these channels are investigated in accordance with the Group's internal compliance procedures and timeframes defined by applicable national legislation. Notifications, requests and investigations will always be treated confidentially by OTP Group member, in observance of the applicable statutory regulations and internal rules, protecting the whistleblower. Code of Ethics prohibits the use of retaliatory measures or negative consequences against anyone who reports in good faith any violation of rules and ethical values. Whistleblowing systems are further described in [G1-1] subchapter.

OTP Group emphasizes awareness and develops knowledge on ethical standards and the whistleblowing system by internal communication, trainings and regular review on compliance with ethical business conduct. Detailed information about the reporting mechanisms is available on the Group's internal platforms, website and in the Code of Ethics. The Group tracks and monitors the effectiveness of ethical reporting channels through multiple approaches: Compliance Directorate evaluates core KPIs of submitted ethical reports and cases, that is reported to Ethics Committee in every six months. Besides, it also monitors the proportion of anonymous reports and implements feedback mechanisms to ensure whistleblower protection guarantees and confidentiality.

Besides of whistleblowing systems, additional channels (personal, phone or mail contact) are available for employees to raise their concerns for managers or HR representatives. Additionally, trade unions<sup>61</sup> have an important role in raising employee concerns and addressing potential negative impacts.

### **3.1.5 [S1-4] Actions set by OTP Group to manage material impacts, risks and opportunities in relation to own workforce**

OTP Group has various initiatives aimed at improving working conditions, enhancing employees' development opportunities, promoting inclusive culture and providing equal opportunities. These initiatives are related to material impacts, risks, and opportunities identified in the DMA 2025.

Although, the Group has not yet developed comprehensive and detailed action plans with dedicated financial resources to manage its material impacts, risks and opportunities related to its own employees, because the identification of material IROs was performed in the reporting year and no negative material impact was identified. OTP Group is in the development process to revise its ESG strategy based on the results of the double materiality assessment conducted in 2025. Accordingly, key focus areas were identified:

Enhancing employee satisfaction and engagement

Ensuring equal opportunities and equity

Supporting talent development and continuous learning

OTP Group aims to comply with legal requirements, develop internal processes and define strategic goals regarding these prioritized strategic directions.

In 2025, group-level strategic development initiatives are focused on ensuring adequate working conditions and promoting positive impact on employees' work-life balance. The Group's inherent objective is to create and maintain a stable and secure work environment by strengthening employee satisfaction and engagement. Thus, it continuously works on the development of operational frameworks and working conditions through well-defined rules and internal procedures. Accordingly, financial segments subsidiaries continuously monitor employee engagement and improve their programs to enhance employees' well-being and commitment at local level. For planning and defining core actions in relation to own workforce, OTP Group's financial subsidiaries consider the results of annual employee engagement survey (further details on the survey is presented in [S1-5] subchapter). The following continuously performed and implemented actions are also aimed to mitigate risks and enhance opportunities and positive impacts, that were identified in DMA 2025.

<sup>61</sup> OTP Bank Plc., DSK Bank, OTP banka d.d. (Slovenia), OTP banka d. d. (Croatia), Crnogorska komercijalna banka a.d.(Montenegro), Ipoteka Bank, OTP Factoring Ltd.

S1 - OWN WORKFORCE			
Material sustainability matters	Identified IRO	Group-level target (financial segment)	Group-level actions (financial segment)
Own operations - Financial services			
Secure employment	(+) I	Secure employment	Labour market analysis
	O	Employee benefits	
Adequate wages	(+) I	Adequate wages	Salary adjustment strategy
	R	Non-adequate wages	Implementation of performance-based bonus systems
Social dialogue	R	Inadequate employee involvement	Introduction of career path concept Consultation with trade unions
Training and skills development	O	Training and skills development	Professional and skill development trainings: - PULZE Digital program - Network-based leadership development program - Ensuring the availability of the Risk Academy Training plans Annual goal setting
	R	Insufficient training and skills development	
Gender equality and equal pay for work of equal value	O	Gender equality and equal pay for work of equal value	Introduction of remuneration policy to promote equal reward and recognition  Ensure compliance with ethical principles (Code of Ethics, whistleblowing channels, ethics training)
Measures against violence and harassment in the workplace	(+) I	Measures against violence and harassment in the workplace	Program of international women's network CIRCLE
Diversity	O	Diversity	General awareness training on inclusion for all employees

For the agricultural segment, the subsidiaries currently do not have dedicated actions or targets on the identified risk of non-adequate wages, therefore no significant expenditures associated with this. Their operational approach complies with applicable legal requirements and regulations, ensuring alignment with Hungarian labour law. Compensation is primarily determined by ensuring earnings above the minimum wage, while the agricultural subsidiaries have own authority to provide additional remuneration (like performance bonus) based on their operational performance. Annual business planning covers the revision of employees' remuneration structure (in alignment with job evaluation and analysis process) and where required, wage correction is performed. Agricultural subsidiaries aim to ensure appropriate and competitive compensation, based on job classifications and in alignment with market benchmarks.

For the financial segment the following actions are determined in relation to material IROs.

**Secure employment:**

- Labour market analysis
- Revision of employee benefit packages

In order to provide stable working conditions that strengthens employee satisfaction and engagement, financial subsidiaries conduct yearly analysis on workforce structure by focusing on employee turnover and organizational stability. HR departments aim to have an overview on organizational changes and national labour market trends, that could influence subsidiary level strategic planning on areas where opportunities or risks could be detected (e.g.: employee benefits, remuneration, skills development). By monitoring and implementing actual labour market trends, financial subsidiaries aim to minimize staff turnover and provide benefits that appreciated by employees. Local labour market analysis also provides inputs to revise and improve employee benefit packages. Subsidiary banks continuously expand benefits with additional day-offs, increased financial support on food allowances and medical examinations, and with additional support for special employee groups (e.g. persons with disabilities, persons on maternity leave).

**Adequate wages:**

- Salary adjustment strategy
- Implementation of performance-based bonus systems

OTP Group financial subsidiaries actively monitor wage increase forecasts, competitor practices, inflation trends, and national median wages to inform local level salary adjustment strategies. Annual reviews on compensation levels (by considering national minimum wage, cost-of-living, inflation rate, legislative requirements, collective agreements) aim to align more closely with national market trends and provide competitive salary levels, that could enhance employee retention. By adjusting employee income growth in line with inflation and prevailing market conditions, banking subsidiaries could prevent staff turnover. Performance-based bonus systems are widely implemented across the Banking group based on Remuneration policy. KPI-based motivation and performance system is implemented across all management levels and departments. With these performance-based initiatives, subsidiary banks could motivate employees through professional growth and link learning achievements with compensation.

**Social dialogue:**

- Introduction of career path concept
- Consultation with trade unions

OTP banking group has introduced career path concept, which aims fostering regular dialogue with employees at key stages of their professional journey. Accordingly, consultation on workplace matters and working conditions is organized with employees and where relevant with trade union representatives, to provide possibility for feedback and negotiations. Subsidiaries' HR departments maintain active cooperation with trade unions (through bi-weekly/ monthly/half-yearly consultations), in order to regularly discuss employee-related issues, gain insights on socio-economic status of employees and inform on actual labour-related issues, that would require further development actions. For example, discussing wages through collective bargaining, consulting on health and safety, and exchanging information on company restructuring. Trade union operation helps address employees' concerns and contributes to define improvement points.

**Training and skills development:**

- Professional and skill development trainings:
  - *PULZE Digital program*
  - *Network-based leadership development program*
  - *Ensuring the availability of the Risk Academy*
- Training plans
- Annual goal setting

OTP Group is offering a wide range of training and development programs, from professional to soft skills development (e.g.: leadership programs, soft and hard skills training, external training and conferences, online individual and group courses) to support the professional growth of employees. Financial segments subsidiaries have the possibility to participate in OTP Bank's group-level learning initiatives (based on Training policy) or to organize individual trainings, based on their own employees' needs and local level focus areas. The core fields of employees training and skills development are defined by annual training plans which combine mandatory trainings required by legal regulations with the development of employees' professional competencies. Accordingly, trainings are organized on the basis of requests received from various departments and considering the most relevant market changes. By compiling and executing detailed training plans related to employee's development aims to improve employees' professional and technical knowledge and soft skills, the Group could increase efficiency, productivity, employee engagement and retention. Training sessions are recorded in banking subsidiaries' internal system, which monitors each employee's progress and acquired qualification.

OTP Bank has launched a comprehensive digital mindset training under the PULZE Digital Program, which is continuously expanded at group level, with several foreign subsidiaries participating in 2025. In addition, OTP Bank ensures ongoing access to the Risk Academy Foundation ESG Module for the international risk management community. The Risk Foundation Module will be extended to stakeholders closely connected to risk functions, including Corporate Banking and Internal Audit. Alongside these initiatives, a network-based leadership development program is offered to branch managers, complemented by career development programs for key business roles like branch manager, private banking advisor, and premium banking advisor. Besides, internal library of online courses and video lectures is also available.

Employees' personal development is supported by determination of performance and development goals within the annual performance management process, tailored to individual development needs necessary for performing their specific role or even develop further. In relation to yearly goal setting, annual performance evaluation focuses on achieving individual and organizational goals, developing competencies, and providing appropriate feedback methods.

**Gender equality and equal pay for work of equal value, Diversity, Measures against violence and harassment in the workplace:**

- Introduction of remuneration policy to promote equal reward and recognition
- Ensure compliance with ethical principles (Code of Ethics, whistleblowing channels, ethics training)
- Program of international women's network CIRCLE
- General awareness training on inclusion for all employees

OTP Group objective is to enhance inclusive workplace culture that upholds the principle of equal pay for work of equal value, the development of a diverse leadership culture through the intentional support of women's career paths, and the promotion of open dialogue around diversity and inclusion.

Principles of equal treatment is focusing on providing equal opportunities to all internal employees and all candidates for vacant positions. Selection or promotion criteria are only based on meritocracy and professional skills, while employee benefits are distributed on either performance based (bonuses) or on equal treatment of benefits based on seniority for all employees. Performance evaluation system is based on objective indicators and/or clearly defined goals to ensure equitable reward distribution. Trainings provided to employees are based on needs or requests specified, which is equally available for all employees. Remuneration policy implementation across the Banking group also intended to promote equal reward and recognition by defining the framework of equal evaluation system and promotion criteria, as guiding on the principles of basic and performance-based remuneration framework. Banking subsidiaries are continuously developing detailed internal rules and procedures to monitor diversity and pay gaps.

Initiatives of diversity and inclusion are embedded in the employee experience – from recruitment through equal development opportunities. Continuous programs are launched to foster inclusive mindset that values respect across all levels of the organization. The Group aim is to support gender equality and inclusive leadership through various programs, such as international women's network CIRCLE, which connects senior women leaders within OTP Group. These leaders are role models and mentors for future generations, fostering both personal and professional growth. In addition, OTP Bank successfully implemented the Digital Girlpower Program, aimed at strengthening women's presence in digital roles and enhancing their capabilities in technology-driven areas. Besides, the Bank has also introduced the Unconscious Bias Program, for all employees, designed to raise awareness and reduce bias in everyday decision-making. This program will be further developed with targeted content addressing key areas such as generational, gender, and cultural diversity.

There are further initiatives across banking subsidiaries, such as general awareness trainings with obligatory annual e-learning with the subject of ethics and conflict of interest, annual whistleblowing campaigns and various educational workshops. Banking subsidiaries promote initiatives for professional development and career advancement that are dedicated to women colleagues and monitors compliance with gender balance principles in the workplace.

Code of Ethics, whistleblowing channels and related trainings, awareness raising campaigns represent the cornerstones of ethical operation and inclusive workplace culture across the Group, as presented in previous subchapters [S1-1, S1-3, G1].

Based on these continuously developed and implemented initiatives in relation to social dimensions of own employees, OTP Group long-term objective is to increase employee satisfaction and engagement, while maintain market competitiveness, provide fair compensation and ensure professional and personal development in diverse work environment. Annual employee engagement survey serves as a core measure to reflect on the most relevant employee matters and to define next year's actions.

The survey is conducted yearly, in October, by presenting the result in November, followed by the action planning period until February. The survey's core results and conclusions represent the basis for defining next year's actions, while also serve as monitoring measures for evaluating efficiency of previous years' activities. The employee engagement survey is coordinated at group level by OTP Bank's HR department, who is responsible to conduct and oversee the project, and to provide platform for subsidiaries in sharing and discussing results. While, subsidiary level action-planning, based on the survey results, is the responsibility of local leaders and their HR team, supported by group-level guidelines and framework. OTP Bank's HR department collects subsidiary-level action plans (considering divisional and directorate-level plans), which are consolidated and presented to the ESC, highlighting key strategic focus areas. Further information on employee engagement survey results is presented in [S1-5] subchapter.

Accordingly, financial subsidiaries have independent decision-making and operational authority to determine individual actions and targets by reflecting on their own operational or country related features. In alignment, the management of employee-related matters, by reflecting on impacts, risks and opportunities, is coordinated by HR departments for respective subsidiaries. Legal and compliance departments support this work to ensure legislative and ethical compliance. Financial and human resources allocated to define and implement actions are varied depending on each subsidiaries' ambitions and the material impacts being addressed. OTP Group's Code of Ethics, Compliance policy and whistleblowing mechanism provide the operational framework to ensure that implemented practices do not cause adverse effects on own workforce.

### **3.1.6 [S1-5] Target set by OTP Group to manage material impacts, risks and opportunities in relation to own workforce**

For planning and defining core actions and targets in relation to own workforce (as described in previous [S1-4] subchapter), OTP Group considers the results of annual employee engagement survey, which highlights areas and employee matters, where improvement opportunities could be defined, and also provides framework for monitoring the introduced employee-related initiatives and actions in the previous year.

The employee engagement index is OTP Group's primary indicator for comprehensively measuring, evaluating, and monitoring effectiveness of own workforce-focused strategic initiatives, development activities and planned programs. These initiatives also reflected on material topics (Secure employment, Adequate wages, Social dialogue, Gender equality and equal pay for work of equal value, Training and skills development, Measures against violence and harassment in the workplace, Diversity) identified in the DMA (2025).

OTP Group's employee engagement index is a comprehensive indicator<sup>62</sup>, as it reflects on factors, which could have influence on employee's satisfaction, well-being, and long-term commitment. The core metric of OTP Group's engagement model is derived from a structured questionnaire based on internationally used methodology, that provides comparable results over time. This output measure evaluates more drivers of employees' workplace experience — like working conditions, reward and recognition, communication and cooperation, well-being, development opportunities, equal treatment and workplace community. Subsidiaries' actions that are defined in these social fields could have positive or negative influence on the indicator.

Accordingly, OTP Group's overarching objective regarding own-workforce-related material topics (and the associated positive impacts, risks, and opportunities) is to achieve an 80% participation rate in the survey, by exceeding financial benchmarks in engagement scores, and aspire to reach the Global 75 benchmark.

<sup>62</sup> There are statements in the survey in relation to the presented social fields that are evaluated by employees on a five-level scale. The engagement index represents the average result of positive responses on each statement.

This defined goal is a relative target, based on international methodology<sup>63</sup>, that compares OTP Group's performance with global benchmark companies<sup>64</sup>. The survey is conducted in a yearly basis, thus results are tracked and monitored on an annual basis. All employees of the participating subsidiaries (covering OTP Group's subsidiaries<sup>65</sup> in all operational countries) could take part in the survey (as further described the core engagement process of own employees in [S1-2] subchapter), to share anonymously their opinion on work-related strategic themes. Employee engagement process follows an annual cycle in each year from October with the consultation, November with the analysis of results, until February to have internal consultations with HR teams and define core actions at subsidiaries level. Afterward the implementation of these actions is continuous during the year. Employee engagement survey and the analysis of its results is carried out in collaboration within OTP Group's subsidiaries, to ensure a consistent approach and providing the possibility for each country to provide feedback and suggest improvement points (action planning is presented in more detail in [S1-4] subchapter). Group level initiatives and actions developed or planned by subsidiaries are key drivers which mostly influence the engagement results. OTP Group has not adopted dedicated policy for the implementation and monitoring of the target.

In the reporting year OTP Group has performed the employee engagement survey with 92% participation rate. The employee engagement index of OTP Group increased by 1% compared to the previous year and reached 78%. There have been slight positive shifts in engagement statements. OTP Group has achieved the Global 75 benchmark in engagement score and is above the financial benchmark in almost all engagement statements.

The target that at least one female member be represented on both the Board of Directors and the Supervisory Board has been achieved.

### 3.1.7 [S1-6] Characteristics of the undertaking's employees

The following section provides an overview of the quantitative characteristics of OTP Group's own workforce (including all employees who have direct employment contract with one of the Group's subsidiaries). Data presented in this chapter has been compiled based on information provided by the Group's subsidiaries, representing information as of 31 December 2025.

Employee headcount data is presented by type of employment relationship (permanent, temporary, and non-guaranteed hours) and further broken down by gender (male and female).

OTP Group employee headcount, persons, as of 31 December						
	2024			2025		
	Total	Men	Women	Total	Men	Women
<b>Employees, total</b>	<b>43,118</b>	<b>15,293</b>	<b>27,825</b>	<b>44,002</b>	<b>16,114</b>	<b>27,888</b>
Full time employees	40,984	14,887	26,097	41,925	15,676	26,249
Part-time employees	2,134	406	1,728	2,077	438	1,639
Permanent employees (employees with indefinite-term contracts)	41,827	14,980	26,847	42,621	15,761	26,860
Temporary employees (employees with fixed-term contracts)	1,291	313	978	1,381	353	1,028
Employees with non-guaranteed working hours	0	0	0	0	0	0

The number of OTP Group's employees has shown a slight increase across all employment relationship categories, except for part-time employees and those working under non-guaranteed hours arrangements. The overall growth is primarily attributable to the expansion of the Uzbek operation, where headcount rose by more than 10%. In addition, the number of employees increased by more than 5% at the Montenegrin and Albanian subsidiaries, while in Slovenia there was a decrease of 6%. In other countries, employee headcount has changed by less than 5%.

The following table illustrates the quantitative characteristics of OTP Group's workforce, disaggregated by country of employment.

<sup>63</sup> No significant changes were made in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data compared to 2024.

<sup>64</sup> External benchmarks are based on over 30 million responses from more than 1,000 companies. Financial Industry benchmark is based on 3.9 million respondents of 149 companies in the banking sector. Global 75th benchmark is based on the top quartile of answers (75th) for all questions.

<sup>65</sup> Including all foreign banking subsidiaries and the following Hungarian subsidiaries: Air-Invest Ltd.; CIL Babér Ltd.; FoglajlOrvost Online Ltd.; Merkantil Bank Ltd.; Merkantil Bérlet Ltd.; OTP Fund Management Ltd.; OTP Ecosystem Ltd.; OTP Life Annuity Real Estate Investment Plc.; OTP Factoring Ltd.; OTP Hungaro-Projekt Ltd.; OTP Real Estate Investment Fund Management Ltd.; OTP Real Estate Ltd; OTP Real Estate Leasing Ltd.; OTP Ingatlanpont Ltd.; OTP Mortgage Bank Ltd.; OTP Building Society Ltd.; OTP Home Solutions Ltd.; OTP Funds Servicing and Consulting Ltd.; OTP Financial Point Ltd.; OTP Travel Ltd.; PortfoLion Ltd.; SimplePay Ltd.

OTP Group employee headcount broken down by country, persons, as of 31 December		
	2024	2025
Hungary	14,298	14,696
Bulgaria	5,302	5,475
Slovenia	2,413	2,266
Croatia	2,485	2,439
Serbia	2,851	2,859
Uzbekistan	4,353	4,842
Ukraine	2,267	2,350
Montenegro	563	597
Albania	700	761
Moldova	878	885
Russia	7,003	6,827
Malta	5	5

The following table presents OTP Group's employee turnover, broken down by gender, and age group. The turnover ratio indicates a slight decrease (1%) comparing to 2024, that can be explained by improvements in retention practices and increased group-level employee engagement levels.

Employee turnover of OTP Group	2024	2025
Turnover rate (%)	20.03%	18.89%
Employees left (prs)	8,918	8,312
Percentage of employees leaving – compared to the total by categories		
male (%)	17.57%	17.10%
female (%)	21.35%	19.92%
under 30 years (%)	39.91%	35.85%
between 30-50 years (%)	16.28%	15.41%
over 50 years (%)	12.89%	14.09%

Total number of OTP Group's employees is presented in chapter [Reference] of the Integrated Annual Report 2025.

### 3.1.8 [S1-8] Collective bargaining coverage and social dialogue

This section provides information on the extent of collective bargaining coverage within OTP Group. It discloses the percentage of employees covered by collective bargaining agreements and the presence of workers' representatives across the organization. These indicators reflect the Group's commitment to fostering constructive labour relations, ensuring employee participation in decision-making processes.

Percentage of employees covered by collective bargaining agreements, on a group-level and broken down by EEA countries, as of 31 December			
2025			
	Total number of employees	Employees covered by collective bargaining agreement	Percentage of employees covered by collective bargaining agreements
<b>Group-level</b>	<b>44,002</b>	<b>28,626</b>	<b>65%</b>
EEA Countries	Hungary (OTP Bank)	11,042	98%
	Hungary (Other subsidiaries)	2,144	3%
	Hungary (Agricultural subsidiaries)	1,510	39%
	Bulgaria	5,475	42%
	Slovenia	2,266	98%
	Croatia	2,439	93%
	Malta	5	0%
	Non-EEA Countries	Serbia	2,859
Uzbekistan		4,842	95%
Ukraine		2,350	100%
Montenegro		597	100%
Albania		761	0%
Moldova		885	0%
Russia		6,827	7

Percentage of employees covered by workers representatives, on a group-level and broken down by EEA countries, as of 31 December			
2025			
	Total number of employees	Employees covered by workers representatives (number of trade union members)	Percentage of employees covered by workers representatives (percentage of trade union membership)
<b>Group-level</b>	<b>44,002</b>	<b>15,891</b>	<b>36%</b>
EEA Countries	Hungary (OTP Bank)	11,042	62%
	Hungary (Other subsidiaries)	2,144	6%
	Hungary (Agricultural subsidiaries)	1,510	7%
	Bulgaria	5,475	40%
	Slovenia	2,266	n/a <sup>66</sup>
	Croatia	2,439	50%
	Malta	5	0%
Non-EEA Countries	Serbia	2,859	23%
	Uzbekistan	4,842	70%
	Ukraine	2,350	0%
	Montenegro	597	83%
	Albania	761	0%
	Moldova	885	100%
	Russia	6,827	0%

OTP Group has no agreement with its employees for representation by a European Works Council (EWC), a Societas Europaea (SE) Works Council, or a Societas Cooperativa Europaea (SCE) Works Council.

### 3.1.9 [S1-9] Diversity metrics

In this section, diversity indicators of OTP Group's top management is presented, focusing on gender and age distribution. These metrics are disclosed to ensure transparency on representation and inclusivity at the highest decision-making levels. The gender ratio in senior position has further increased (by 3%) from 2024, toward higher representation of male employees in top management. While the representation of employees in the defined age groups remained similar like in the previous reporting year.

Gender distribution of OTP Group's senior management, as of 31 December				
	2024		2025	
	Men	Women	Men	Women
Number of senior managers (person)	66	16	72	14
Proportion of senior managers (%)	80.49%	19.51%	83.72%	16.28%

Age distribution of OTP Group's employees, as of 31 December		
	2024	2025
under 30 years	18.68%	18.39%
between 30-50 years	60.70%	60.56%
over 50 years	20.62%	21.05%

### 3.1.10 [S1-10] Adequate wages

OTP Group provides an adequate wage (by considering country level minimum wage and benchmark salary) for all employees in its own workforce. The Group respects and adheres to the minimum wage requirements in each country where it operates.

### 3.1.11 [S1-13] Training and skills development metrics

OTP Group is committed to develop employees' skills and professional knowledge by organizing regular trainings on various topics aligned with the Group's strategic objectives to ensure alignment with employee needs and organizational objectives. The metrics presented in this chapter reflect on the Group's dedication to offering continuous learning and development opportunities for its own employees.

<sup>66</sup> Trade union membership is treated as confidential information at the Slovenian subsidiary, and, as a result, the employer does not maintain records of such membership.

<sup>67</sup> Trade union membership is treated as confidential information at the Slovenian subsidiary, and, as a result, the employer does not maintain records of such membership.

OTP Group's annual training hours per employee		
	2024	2025
Senior manager	110	57
Middle manager	80	45
Employee	31	31
Men	27	27
Women	41	35
<b>Average</b>	<b>36</b>	<b>32</b>

The group level ratio of average annual training hours per employee has increased and there was a significant shift in managers' level training hours, compared to 2024. The number of training hours rose in almost all subsidiaries (OTP Russia and OTP Fund Management showed a higher growth ratio). Further changes in training hours in 2025, were derived from differences in the implemented training programmes among subsidiaries. In 2025, senior managers are placed greater emphasis on attending conferences. Middle managers' training hours has highly increased, mainly in OTP Bank and in Serbian and Russian entities, where the attendance on e-learning trainings have almost doubled in 2025.

Percentage of OTP Group's employees receiving regular performance and career development reviews		
	2024	2025
Proportion of senior managers (%)	89.65%	95.35%
Proportion of middle managers (%)	87.90%	94.41%
Proportion of employees (%)	68.96%	68.02%
Proportion of men (%)	66.35%	67.21%
Proportion of women (%)	72.26%	71.79%
<b>Proportion of total (%)</b>	<b>70.91%</b>	<b>70.79%</b>

The percentage of the Group's employees receiving regular performance and career development reviews shows only minor variations compared to 2024. Regular performance and career development review was slightly more common among senior and middle managers, than among employees. Since employees make up a much larger proportion of the workforce, the proportion of total receiving in performance and career development decreased minimally.

### 3.1.12 [S1-16] Remuneration metrics (pay gap and total remuneration)

The gender pay gap between female and male employees in OTP Group, expressed as percentage of the average pay level of male employees, is 33.81% in 2025, representing 1.02% decrease compared to 2024, when the gender pay gap was 34.83%. OTP Group's gender pay gap is primarily reflects on higher ratio of male employees in senior and leader positions, that are associated with higher remuneration

In OTP Group the ratio of the total annual compensation of the highest-paid individual to the median total annual compensation of all employees (excluding the highest-paid individual) was 172 in 2024 and has decreased to 165 in 2025.

### 3.1.13 [S1-17] Incidents, complaints and severe human rights impacts

OTP Group subsidiaries have various whistleblowing mechanisms to provide opportunities for both employees and external workers to voice their complaints and grievances. These mechanisms include anonymous options to ensure that employees can use these channels with confidence. The ethical reporting system is available to the entire workforce.

The table below discloses all incidents and complaints recorded in OTP Group's whistleblowing channels during the reporting period, along fines paid (that has shown a significant decrease compared to prior year).

Incidents and complaints recorded by OTP Group's own workforce		
	2024	2025
Total number of justified incidents of discrimination (including harassment)	0	4
Ethical reports submitted	106	163
Total amount of fines, penalties, and compensation for damages as a result of ethical reports submitted	0	0
Complaints submitted to the national contact points considering the OECD guidelines for multinational enterprises	0	0
Complaints submitted to the trade union	2	0
Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints submitted to the trade union	0	0
Labor proceedings initiated	57	45
Total amount of fines, penalties, and compensation for damages as a result of labour proceedings	HUF 235 million	HUF 32 million

During the reporting period, no severe human rights issues or incidents related to own workforce occurred, and no fines, penalties or compensation were imposed in connection with such matters. Accordingly, no related amounts are reported in this table.

Compared to 2024, during the reporting period the number of reported discrimination cases affecting the company's own workforce (including harassment) increased, with a total of 14 cases recorded. Out of these cases, 4 were confirmed as justified discrimination cases, all of which occurred at OTP Bank. Each reported case was thoroughly investigated in accordance with the Bank's internal procedures.

The Group records fines, penalties and compensation for damages among other expenses which are presented in Note 34 of the Consolidated IFRS Report.

### 3.1.14 Reporting policy

**Employee engagement indicator:** One of the key indicators of OTP Group's employee engagement model is the employee engagement index. This is an output score that cannot be directly improved. Drivers are specific experiences (e.g. community building, empowerment, recognition, etc.) through which an organisation can positively or negatively influence engagement. The key elements of the engagement survey are statements with which agreement is measured on a 5-point scale. Engagement is a composite indicator that reflects the average of the proportion of positive responses given to the statements it contains. When interpreting the engagement indicator, OTP Group pays attention to financial sector and global benchmarks, which can provide a reference for organisational improvements.

**Employees:** All workers who have a direct employment contract with one of the Group's subsidiaries are considered employees. The number of employees is the end-of-year headcount, covering active employees.

**Employee data:** Employee data are taken from OTP Group's subsidiaries registration systems.

**Breakdown of data:** The number or distribution of employees is the number of persons employed at the end of the year (31 December). Breakdowns are provided for countries where the Group has 50 or more employees, representing at least 10% of the total number of employees. In the case of gender breakdown, the "Other" category is not used, as OTP Group's records include male and female genders, which are recorded on the basis of personal identification cards.

**Permanent employees:** employees with indefinite-term employment contracts.

**Temporary employees:** employees with fixed-term employment contracts.

**Non-employees in the own workforce:** persons who are not directly employed by the company but regularly perform work for the company. On the one hand, it includes temporary agency workers, who are mainly made available to the company by undertakings engaged in "employment activities" (NACE code: N78). On the other hand, we also include sole traders who contract with the company as individuals or sole traders to carry out specific works. Among sales agents, those who are tied agents and contract directly with the company as sole traders fall into this category.

**Non-guaranteed hours employees:** the number of working hours is not specified in their employment contract.

**Contract type:** Full-time and part-time employees are classified according to local regulations in each country.

**Turnover rate:** When calculating staff turnover, the number of employees who left is the total number of employees who left the Group during the reporting period, including those who left voluntarily, were dismissed, retired, or died. The turnover rate is the number of employees leaving divided by the number of employees at the end of the year.

**Senior management:** The Group applies the following definitions for top management:

- OTP Bank Plc: the CEO and all his/her deputies;
- for subsidiaries in Hungary: the 1st-level manager of the subsidiary and the managers covered by the remuneration policy;
- for foreign banking subsidiaries: the bank's 1st-level manager (CEO) and his/her deputy CEOs, or the level of direct management below the CEO (CEO-1).

**Gender distribution:** At top management level, gender distribution is determined by headcount (number of persons by gender groups – men/women) based on end-of-year data.

**Middle managers:** Employees who are not part of the top management team but have professional and human resource management responsibility for a permanent department, as defined at company level.

**Subordinates:** All employees who are neither top managers nor middle managers, as defined at company level. The number of employees by age group is expressed in headcount, i.e. the number of employees (persons) at the end of the year (31 December). The age groups are: under 30 (including 30th birthday); 30-50 (including 50th birthday); 50+.

**Adequate wage:** It refers to a level of remuneration that meets or exceeds the applicable adequate wage benchmark in each country of operation. The benchmark shall not be lower than the statutory minimum wage or equivalent legally defined threshold. In the EEA, this includes minimum wages set in accordance with Directive (EU) 2022/2041. Outside the EEA, adequate wage benchmarks are determined based on applicable international, national or sub-national laws, official standards, or collective agreements. Compliance is assessed by comparing the lowest wage paid by the undertaking with the applicable benchmark in each country.

**Performance assessment:** For the percentage of employees who have participated in regular performance assessment and career reviews, the numerator includes employees who have been assessed at least once during the reporting period (e.g. for companies with a twice-yearly assessment cycle, those who were assessed in February or September). The Group considers all completed assessments to be accepted by management. The denominator includes the headcount at the end of the year, broken down by gender and by function.

**Training hours:** To calculate the average training hours per employee, the number of training hours completed by all employees during the year is divided by the total number of full-time equivalents (FTE) as 31 December. Trainings include all trainings except school-based trainings and vocational trainings. Recurring trainings that occur in the reporting year (e.g. compliance, security, health and safety, etc.) are also included.

**Working hours:** Working hours are mainly the number of hours actually worked, based on the timesheets. Where complete records are not available, hours can be estimated by multiplying the headcount by the average number of hours worked per year.

**Calculating gender pay gap (%):**  $(\text{Average gross hourly pay level of male employees} - \text{average gross hourly pay level of female employees}) / (\text{Average gross hourly pay level of male employees})$  The hourly pay level is the total pay divided by the number of hours worked. The total pay is the total annual payment. Entities with less than 15 employees at the balance sheet date do not report data for this datapoint.

**Remuneration ratio:** The annual total remuneration ratio is the remuneration of the highest paid individual / median employee remuneration (excluding the highest paid individual). The calculation includes the basic salary paid and all other allowances and remuneration (additional or variable elements). Due to the difficulties of data aggregation, the median data for employees includes data for a total of about 41,000 employees.

**Total number of justified incidents of discrimination (including harassment):** The number of work-related incidents of discrimination — including harassment as a specific form of discrimination — raised by members of the undertaking's own workforce and recorded through the organisation's formal or informal channels (e.g., Ethical Report System), that were investigated and confirmed as substantiated during the reporting period.

### 3.2 [S4] Consumers and end-users

OTP Group is a significant financial service provider in the CEE region, offering a wide range of banking products and services in Hungary and surrounding countries, as well as in Eastern Asia. Accordingly, OTP Group has a large and diverse client base with various needs and background knowledge on financial risks and opportunities. The Group aims to provide comprehensive and adequate information on products and services, while acknowledges its responsibility for clients' data handling, and the identification and prevention of cybersecurity risks. OTP Group's primary objective is to ensure information security and data protection through internal policies, risk management practices, and IT control procedures, in alignment with regulatory requirements. On the other hand, the Group is committed to actively participate in financial education and awareness-raising campaigns, provided for its clients and the wider society. Effective communication, based on ethical standards and responsible marketing practices, is a core element of providing accurate information and promoting financial awareness.

#### 3.2.1 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

OTP Group has identified the following material IROs (positive impact and risks) in relation to consumers and end-users ("clients") in the double materiality assessment (2025). Further details are presented in ESRS 2, [SBM-3] subchapter.

S4 - CONSUMERS AND END-USERS			
Material sustainability matters	Identified IRO (category: (+/-) I: positive/negative impact, R: risk, O: opportunity, name and description)		
Own operations - Financial services			
Privacy, Data security	R	Data privacy and cybersecurity breaches	OTP Group handles a significant amount of client-related sensitive data and information, thus adequate information protection (risk mitigation and preventive measures to avoid fraud incidents or data loss of clients) is essential in its operational framework. Inadequate IT practices can lead to incidents, cyberattacks, and data security breaches, while causing significant reputational and financial losses to OTP Group, including penalties, legal consequences, and customer dissatisfaction.
Access to (quality) information	(+) I	Awareness raising in financial education and marketing	The Group is committed to educate and positively influence its employees, customers and the wider society through various initiatives, including programs and campaigns, to enhance general knowledge on financial products, online banking and related risks (e.g. data breaches, cyberattacks). These awareness raising initiatives aim is to provide educational content accessible to anyone.
Responsible marketing practices	R	Inadequate information provision to customers	Inadequate information provision, misinformation, misunderstanding of financial products' attributes can lead to biased decision-making, dissatisfied customers, and loss of trust in financial institutions' products and/or services. The operation of financial institutions regarding information provision and marketing practices is highly regulated, thus non-compliance could involve regulatory fines and sanctions, loss of reputation and loss of clients. Sales agents, as representatives of OTP Group, interact with a wide range clients or potential clients during their activities. Improper conduct by agents engaged by OTP Group, such as providing misleading information, may represent a risk to the Group.

The Group has considered all client groups from retail and corporate segments in the DMA process that could be materially impacted as consumers or end-users of the banking products and financial services it offers. Main consumer types include individual and corporate clients, as well as other legal entities that use various banking or investment services, including supplementary financial and digital services offered by OTP Group's subsidiaries. Consumers' and end-users' financial decisions rely on information provided about financial products and services; therefore, accurate and comprehensive information provision is a core priority for the Group from operational and regulatory perspectives.

Potential data breaches, cybersecurity risks, fraud or misuse of digital financial services and financial awareness-raising activities could equally affect the Group's clients. However, certain consumer and end-user groups are more exposed due to a lack of adequate financial or digital knowledge and resources (e.g. financially vulnerable individuals, elderly customers, junior customers, people with disabilities). These groups of customers face increased vulnerability to cyber threats, fraud or misuse of digital financial services, and potential difficulties in understanding or accessing financial products.

OTP Group's objective is to serve their clients' interests and ensure legal compliance with the European Union and respective national legislations on consumer rights by maintaining transparent communication, while ensuring fair marketing practices and data protection procedures.

### **3.2.2 [S4-1] Policies related to consumers and end-users**

OTP Group has multiple policies, operational instructions in place, which aim to guide and control client related matters and data protection procedures within the organization. The Group's core policies related to managing the identified material positive impact and risks for consumers and end-users include the Code of Ethics, ICT and Information Security Policy, Responsible Marketing Policy, Anti-Fraud Policy and Compliance Policy. These policies are provided internally for employees in OTP's intranet and training sessions with supplemental operative instructions, while an extract of compliance regulations and data protection principles are publicly available on OTP Group's website.

Summary table of main policies in relation to material IROs:

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Code of Ethics</b>				
<p><i>Privacy, data security</i></p> <p><i>Access to (quality) information</i></p> <p><i>Responsible marketing practices</i></p>	<p>The core guiding policy for OTP Group's ethical operations sets out principles and expectations for ethical business conduct, including ethical and compliance standards concerning clients and customers. It reflects the Group's commitments to business ethics – such as information security, data protection, anti-corruption, fraud prevention – along with compliance with ethical rules and details on ethical reporting system.</p> <p>Further details on the Group's Code of Ethics and Partner Code of Ethics are presented in [S1-1] subchapter.</p>	OTP Group	Supervisory Board and Board of Directors, Ethics Committee, Supported by compliance, legal and HR departments	<p>OECD Guidelines for Multinational Enterprises</p> <p>UN Global Compact</p> <p>Universal Declaration of Human Rights (UN)</p> <p>ILO Core Conventions</p> <p>ISO 26000 Guidance on Social Responsibility</p> <p>Compliance with EU and National Legislation</p>
<b>ICT and Information Security Policy</b>				
<p><i>Privacy, data security</i></p>	<p>This policy aims to establish a unified framework that ensures secure, compliant, and resilient operation across all banking activities. Its primary purpose is to safeguard data, information assets, and ICT systems against evolving cyber risks while ensuring compliance with international and national regulations, industry standards and best practices. The policy defines strategic directions and fundamental principles for information security. Furthermore, it supports proactive risk management, incident prevention and mitigation.</p> <p>The Configuration Management Policy is its supplemental policy, whose objective is to establish a unified, automated, and process-driven configuration management system that ensures transparent and secure ICT service operations across the Group.</p>	OTP Group's financial segment	Security Directorate	ISO 24495/1
<b>Compliance Policy</b>				
<p><i>Privacy, data security</i></p> <p><i>Access to (quality) information</i></p> <p><i>Responsible marketing practices</i></p>	<p>This is the core guiding policy to ensure legislative and ethical compliance, including information security, data protection, and consumer protection within the Group's operations. It is based on the Central Bank of Hungary's recommendation—aligned with the guidelines of European financial supervisory authorities and the recommendations of international financial regulatory bodies— to set out key principles and requirements for financial service providers for establishing and operating internal protection and security lines that support organizational resilience.</p> <p>Key areas covered by operational rules and control procedures include GDPR compliance, integrity standards, information provision in relation to financial and investment services, appropriate customer services, and the consumer protection compliance program.</p>	OTP Group's financial segment	Supervisory Board and Board of Directors, supported by compliance, and legal departments	EU GDPR

Material sustainability matters	Key content	Scope	Accountability	Third-party standard
<b>Anti-Fraud Policy</b>				
<i>Privacy, data security</i>	The policy covers the assessment of current fraud prevention and management practices, the identification of expected future fraud trends, the exposure of the financial organisation, the responses to emerging trends, as well as the definition of related objectives and tasks. The policy states that OTP Group ensures the prevention, detection, and investigation of fraud occurring within the Banking group in accordance with legal requirements and the guidelines issued by European and national financial supervisory authorities. It summarises the regulatory environment and the general objectives of fraud prevention—emphasising the role of employees—while defining the core principles and key concepts of anti-fraud activities and outlining the position of the fraud prevention function within the system of internal lines of defence.	OTP banking group	Supervisory Board and Board of Directors, supported by Security Directorate	Legal requirements and the guidelines issued by European and national financial supervisory authorities, Hungarian National Bank Recommendations
<b>Responsible Marketing Policy</b>				
<i>Access to (quality) information</i>  <i>Responsible marketing practices</i>	OTP Group is committed to the responsible marketing of its products, prioritising fair commercial communication, accurate information, and appropriate product recommendations. It takes the utmost care to provide accurate, clear and comprehensive information to existing and prospective customers about its products and services, and usage conditions, while ensuring compliance with consumer protection regulations. The aim of the banking subsidiaries is to empower customers to make informed decisions about financial products and services.	OTP Group's financial segment	The Head of OTP Bank Marketing and Communications Directorate	N/A

OTP Group's policies which address material IROs related to clients, are aligned with EU consumer protection directives and their nationally transposed regulations by considering all kind of customers equally. The Group's human rights commitments (including confidentiality, data protection, external communication, transparent information provision related to financial services, and consumer protection, complaint handling) are presented in OTP Group Human Rights Statement and Code of Ethics, in alignment with the guiding principles of internationally recognized frameworks. OTP Group's policies and practices on 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.

The Group is committed to upholding human rights across all areas of operation and in relation to all clients and business partners it deals with. OTP Group considers it essential that its business activities do not infringe human rights and that any related concerns involving the Group are addressed promptly. Human rights commitments and ethical principles guide OTP Group's employees and agents in respecting customers' rights.

OTP Group complies with the respective laws and regulations of the countries where the Group engages in business activities. If any conflict arises with the internationally recognized standards, the Group strives for the highest possible level of compliance with those standards while adhering to applicable laws and regulations in all jurisdictions where it operates. In addition, whistleblowing channels are in place, providing clients and third parties the opportunity to report human rights violations, which incidents are recorded internally and addressed in accordance with the operational rules of the whistleblowing channel.

### 3.2.3 [S4-2] Processes for engaging with consumers and end-users about impacts

OTP Group operates through multiple channels to engage customers and incorporate their perspectives into decision-making, aiming to manage client-related impacts, risks and opportunities. OTP Group regularly collects customer feedback and monitors customer satisfaction. This engagement mechanism is based on feedback collected directly from retail banking customers through annual satisfaction surveys. Customer satisfaction surveys, conducted in most of the banking subsidiaries<sup>68</sup>, are based on standardized methodologies, including TRI\*M, complemented by Net Promoter Score (NPS) and Service Quality Measurement (SQM, digital and CC channels) in banking subsidiaries. The methods of engagement processes are in line with the respective EU and national legislations by considering all kind of customers equally

The client engagement survey focuses on evaluating customers' experience and is conducted annually. The process involves representative samples of approximately 1,000 clients per country of each banking subsidiary, ensuring broad coverage across customer segments. This approach enables the Group to identify areas for improvement by incorporating clients' perspective on its financial services.

The Marketing Department is operationally responsible for ensuring that client engagement survey is conducted.

In addition to these mechanisms, the customer complaint management system serves as a continuous feedback channel, offering insights into customer concerns and supporting corrective actions. The Group does not maintain formal cooperation with consumer organizations or representatives.

### 3.2.4 [S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

The Group provides multiple channels for customers to submit complaints. Complaint management processes are governed by regulatory requirements and are designed to be fair and consistent with internationally recognized human rights principles. Complaint management system aligns with applicable EU and local regulatory frameworks of the subsidiaries. The Group strives to maintain an open dialogue with complainants to ensure timely and effective resolution. In cases where complaints are deemed justified, the Group aims to restore the original state or provide an appropriate remedy and, where relevant, offer compensation based on the principles of fairness and proportionality.

In the DMA process, the Group has not identified any material negative impact related to customers and end-users. Customers can raise their concerns through OTP Group's whistleblowing channel (detailed in subchapter [G1]) and may also submit complaints through other reporting channels (website, telephone customer service, in person at branches, or by postal mail). These multiple channels are available for employees and third parties to raise concerns about unlawful conduct or behaviour in contradiction of Code of Ethics. Reports may also be submitted anonymously. Issues raised through these channels are investigated in accordance with the Group's internal compliance procedures. For EU member banking subsidiaries, a financial arbitration body is also available.

OTP Group informs customers about reporting channels and complaint management process through multiple platforms, including corporate websites, official publications, written correspondence, branch-level regulations, and social media. These channels are designed to be accessible and accurate for customers' needs.

Complaints received through reporting or other channels are assigned a unique ID to track the status and investigation process in compliance supporting internal banking systems. Each case is assigned to the most relevant departments (compliance, legal, HR of the respective subsidiaries), and designated employees are responsible for reviewing and resolving the issue. Customers are continuously informed about the complaint-handling procedure (including additional requirements and actions taken).

<sup>68</sup> All foreign banking subsidiaries, except Russian subsidiary.

The Group prepares monthly, quarterly, and annual reports detailing the number, type, status of received complaints, as well as the planned resolution time. These reports serve as a basis for monitoring the effectiveness of complaint-handling processes and for identifying areas for improvement. Aggregated data analysis enables the identification of recurring issues, which indicate weaknesses in operational procedures and areas. Based on the monitoring reports, corrective actions are developed and implemented in collaboration with the affected operational areas.

In addition, the Group monitors the frequency of complaint channels used to gather information, which reporting channels are preferred by clients and analyse issues that could occur in relation to the complaint reporting mechanism.

In 2024, OTP Group introduced a new client complaint management platform to enhance complaint-handling processes through automated solutions. The platform aims to reduce resolution times and enable more efficient complaint-reporting procedures. Further information on customer complaints is presented in the following S4 metrics subchapter.

**3.2.5 [S4-4] Actions taken by OTP Group to manage material impacts, risks and opportunities in relation to customers and end-users**

The Group’s financial subsidiaries aim to mitigate potential risks related to data privacy, cybersecurity breaches, and inadequate information provision, while remaining committed to enhancing financial awareness and customer education. Financial segments subsidiaries continuously implement and develop Group level initiatives to actively contribute to cyber-risk and data-breach prevention and client education at the local level. Their efforts focus on IT system improvements to create a more efficient complaint-reporting and management framework. In addition, financial subsidiaries make continuous efforts to raise employee awareness through mandatory annual e-learning training on data protection. These specialized trainings aim to strengthen understanding of key regulatory requirements and responsibilities related to data processing, and to ensure that employees are equipped to recognize and manage risks that may affect the Bank’s compliance posture and reputation.

In addition, regular control of established data management and information security processes, detailed investigations when risks or incidents are detected, ongoing awareness-raising activities within the organizations are part of their continuous, compliance-focused operations. OTP Bank continuously supports and monitors the fraud-prevention efforts of its subsidiaries, including the development of data-protection and fraud-management capabilities.

The Group has not yet developed comprehensive and detailed action plans with dedicated financial resources to manage its material impacts, risks and opportunities related to its consumers and end-users, because the identification of material IROs was performed in the reporting year and no negative material impact was identified. The following continuously performed and implemented actions by the Banking group are aimed to mitigate material risks and enhance the positively identified impact.

<b>S4 - CONSUMERS AND END-USERS</b>			
<b>Material sustainability matters</b>	<b>Identified IRO</b>	<b>Group-level target (financial segment)</b>	<b>Group-level actions (financial segment)</b>
<b>Own operations - Financial services</b>			
<b>Privacy; Data security</b>	R <i>Data privacy and cybersecurity breaches</i>	Obtain ISO 27001 certification for the Security Operations Centre's information security incident management process by 31 December 2025.	Group-level security management, coordinated by Security Directorate  Compliance Program, including data and customer protection trainings
<b>Access to (quality) information</b>	(+) I <i>Awareness raising in financial education and marketing</i>	No available target	Customer-education strategy
<b>Responsible marketing practices</b>	R <i>Inadequate information provision to customers</i>	No available target	Customer related compliance program

## Privacy, Data security

### *Group level security management*

The Group's objective is to adequately manage cyber risks and develop a resilient operational framework for information security and data protection. The Security Directorate serves as the central function for planning and defining core group-level actions to manage risks related to financial crimes and cyber threats, and fraud prevention. This dedicated organizational unit is responsible for group-level security management, maintaining active contact with relevant security functions of the banking subsidiaries. The Security Directorate's core responsibilities include analysing information related to security incidents, assessing their potential group-wide impacts, and disseminating relevant findings across the Group. It supports the implementation of IT security, banking security, personnel security, and fraud-prevention requirements at the Group level. The main goal is to establish a consistent and robust group-level, fraud-management framework; therefore, the department standardizes and enhances fraud-prevention and mitigation capabilities and activities.

As an essential complementary part of fraud prevention, the Banking group also place special focus on client education, playing an active role in financial awareness-raising through national campaigns and various cybersecurity initiatives. These activities include, among others:

- Continuous efforts to promote employees' and sales agents' awareness of consumer protection through training, newsletters, videos provided regularly to the branch network
- A dedicated process for approving new products includes consumer protection considerations
- Regular review of the Bank's terms and conditions
- Programs and campaigns to raise clients' awareness of cybersecurity and phishing attempts
- Special educational campaigns and promotions targeting specific audiences (such as youth or elderly clients)
- Communication through multiple internal (email, intranet) and external (online, mobile banking, also by postal mail, press releases, website, social media, events) channels to raise awareness of fraud identification
- Inform clients and collect feedback on existing threats and risks (e.g. workshops with clients from different segments, special events where both branch and administrative staff provide information and share experiences with digital tools)
- Dedicated website to inform customers about potential fraud type, how to prevent them and protect their data
- Real-time fraud-detection tool
- Interbank cooperation to strengthen cyber resilience

The effectiveness of these efforts is continuously monitored through customer feedback, complaint analysis, and internal audits. The Group's overall aim is to ensure fair and non-misleading business practices; thus subsidiaries make significant efforts in fraud prevention, detection, and mitigation activities.

The Group's financial subsidiaries allocate resources based on their business approach and management board decision to develop internal risk management and control systems for client's data management and information protection, based on inputs from Group's Compliance and IT department and local experts.

The Group Security Directorate supports the fraud-prevention activities of foreign subsidiaries and strengthens their effectiveness by sharing best practices and alerts, organizing presentations and workshops, and assisting subsidiaries in optimizing local practices and processes (e.g., anti-fraud communication workshops). To enhance these efforts subsidiaries increasingly use the Fraud Information Sharing SharePoint platform, which was established to share more efficiently of fraud-prevention information within the Group. Employees are becoming more active on the platform, sharing information more frequently, and leveraging data contributed by other Group members. Subsidiaries receive regular (monthly) feedback on platform utilization.

The Security Operations Centre contributes to detecting cross-border fraud types and scammer groups, as well as mitigating adverse impacts by coordinating group-level information sharing and incident management.

The Security Directorate reports annually on its activities by presenting implemented mitigation measures and the results achieved (which serve as an inherent representation on the effectiveness of the actions), to the Management Committee, the Board of Directors, and the Supervisory Board. Similarly, the Compliance Directorate prepares quarterly reports for the Executive Steering Committee and the Board of Directors, and annually to the Supervisory Board, about the banking subsidiaries' compliance activities and status, including adherence to data security and consumer protection rules, legal provisions, supervisory expectations, and the relevant decisions of consumer protection authorities.

#### *Compliance Program: data protection*

In addition, Compliance Directorate exercises functional control over guidelines, methodology and infrastructure of the banking subsidiaries' client-related information and data protection aligned with EU (GDPR and other mandatory information provision and protection related legislations) and national legal acts.

The Group's data management processes are designed in accordance with data protection regulations, ensuring purpose limitation and adherence to privacy principles. Customers are consistently informed about all data management activities involving their personal data.

Compliance with data protection requirements, including the effectiveness of data protection actions, is monitored through compliance control tools that assess regulatory compliance of individual products and processes and highlight areas where corrective actions are necessary. OTP Group also cooperates closely with the Banking Association and relevant authorities to define improvements in data protection processes.

Data protection training is organized annually and is mandatory for all employees across the Group. Consumer protection training is required at OTP banking group for colleagues who interact with customers or are involved in product development.

Designated Data Protection Officers within the Banking group are responsible for ensuring compliance with data management requirements, including oversight of personal data processing, adherence to data minimization principles, and handling high-risk data. To ensure accountability, Data Protection Officers participate in annual professional training.

In case clients experience misconduct related to OTP Group's data management practices, multiple complaint-reporting channels are available. Suspicions of ethical violations — including potential human rights breaches — can be reported through the Group's ethical reporting system. Customer reports and complaints are investigated and if any data protection shortcoming or error is identified, mitigation actions and improvements to the relevant product, service, or processes are implemented.

In case of any deficiencies, the Data and Consumer Protection Department informs the network of Data Protection Officers and Compliance Officers about required measures related to identified deficiencies. To assess potential significant adverse impacts, they conduct risk-analysis reviews in the areas of data and consumer protection, if any problem is detected, a more detailed investigation process is carried out (related to procedures and products). To ensure risk prevention and mitigation, the respective departments cooperate with other experts within the Group to provide recommendations for integrating appropriate measures into data management processes.

#### **Access to (quality) information, Responsible marketing practices**

The Group is committed to be compliant with legislative requirements on consumers' rights and information protection and to following responsible business conduct in its relationships with clients. OTP Group, as a client-focused financial service provider, emphasizes consultation with its customers to identify potential needs in product development and to provide information on potential threats and fraud attempts.

#### *Customer-education strategy*

Regarding financial awareness raising, the Group's objective is to promote customer education through multiple channels and campaigns, that go beyond traditional marketing activities and focuses on delivering detailed, professional information on informed decisions regarding financial products and services, while highlights potential data breaches and fraud incidents.

Due to the rising incidence of online financial fraud—particularly phishing attempts—it is essential for the Group to maintain a comprehensive and purposefully designed customer-education strategy. This strategy serves a dual purpose: enhancing customers' digital awareness and strengthening their responsibility for safeguarding their financial security, while supporting long-term trust and service resilience. The strategic pillars of customer communication include continuous awareness-raising, adequate information provision on digital prevention tools, active participation in community dialogue, and close cooperation with relevant external partners. Through this approach, customers could be able to identify fraud attempts, using the Group's digital security solutions effectively, and develop safe banking practices.

OTP Group has launched segmented and continuously expanding educational campaigns to inform various target groups about the types of fraud that may affect them, as well as the banks' related protective measures. In cases of suspected fraud or abuse, customers are supported to report incidents immediately via the dedicated phone number and email address connected directly to the Fraud Management Department. Campaigns are communicated through multiple media channels and online platforms popular with younger audiences. All communications direct users to a dedicated educational webpage where they can test and improve their knowledge. These initiatives aim to strengthen customer understanding and support informed decision-making. While no quantitative targets were set for improving customer awareness, progress is monitored (including the effectiveness) annually through changes in the Self-Care Index<sup>69</sup> trend developed by OTP Bank.

#### *Customer related compliance program*

OTP Group has established consumer protection principles in all areas of its activities and considers changes in consumer habits and interests. The Group strives to provide its customers with all the necessary information regarding its products and services, enabling them to select appropriate services, and stay informed about potential risks and exposures.

The Compliance Directorate has defined customer related compliance programs, including the monitoring of effectiveness on compliance protection procedure, to ensure that employees and managers have a clear understanding on consumer protection rules, compliance objectives and their importance, and are aware of the risks of non-compliance and its possible consequences. The program and related actions are continuously performed by the Compliance department.

The Compliance Program ensures that all advertising materials and commercial communications published by the Bank are clear and fair, timely and complete, fully informing customers and helping them make informed financial decision. The Group does not tolerate any conduct by employees, managers or business partners that is illegal or may result in official sanctions.

### **3.2.6 [S4-5] Targets set by OTP Group to manage material impacts, risks and opportunities in relation to customers and end-users**

#### **Privacy, Data security**

The Group proactively monitors indicators of potential cyberattacks, that could affect both the Group's infrastructure and its customers. The objective of these preventive measures is to mitigate reputational risk and enhance overall client satisfaction. In addition, awareness campaigns - focusing on areas such as cybersecurity and fraud prevention - help reduce the exposure of customers with limited digital literacy, thereby decreasing their vulnerability to online fraud. Specific targets for these objectives have not yet been established.

In 2024, the Group planned to obtain ISO 27001 certification for the Security Operations Centre's information security incident management process by 31 December 2025. The certification process is currently underway; however, completion is expected to be delayed by several months beyond the original deadline.

<sup>69</sup> The OTP Bank Self-Care Index is a research-based indicator that measures how prepared and proactive people are in managing their long-term financial security. It reflects attitudes, knowledge, and behaviours related to savings, investments, and retirement planning. The index has been published annually since 2011 to monitor trends in financial awareness and self-care among the Hungarian population.

### Access to (quality) information, Responsible marketing practices

In addition, the Group's objective is to enhance incident-response efficiency and mitigate potential adverse impacts on operations and on clients' and banks' assets. No specific target with measurable objectives was set, compliance with EU and national legislation and with internal banking rules serves as the guiding principles for cyber and data security risk management. Security Directorate and Compliance Directorate are continuously monitoring and reporting on cybersecurity and data privacy risks, preventive measures and mitigating actions as presented above.

#### 3.2.7 [S4-3] Metrics related to material risks in relation to consumers and end-users

Customer complaints, OTP Group	2024	2025
Number of closed complaints	~581,000 pcs	~580,000 pcs
Number of substantiated complaints	~308,000 pcs	~251,000 pcs

Beyond complaints, OTP Group received a total of 838 ethics reports through the Ethical Reporting System in 2025, of which 163 were from employees on HR topic, and the remaining from costumers and other stakeholders. The number of reports from costumers cannot be specified due to anonymity.

The number of reports received through other channels was 6,569 in 2025, the vast majority of which were received by Moldovan subsidiaries.

In 2025, just like in 2024, there were no serious human rights incidents related to customers in OTP Group.

GRI 418-1 Breaches of customer privacy and personal data (number of cases) OTP Group	2024	2025
number of substantiated complaints by external parties	39	31
number of complaints by regulatory authorities	17	8
number of breaches of customer privacy	37	13
number of data theft incidents	0	2
number of times data were lost by the organization	0	1

All together 702 data leakage incidents took place at OTP Group, besides the above of which 683 occurred in OTP Bank and 19 cases in subsidiaries, primarily due to incorrectly recorded contact details (such as email address, phone number or residential address). However, no reports or complaints related to the misuse of personal data were received, and no cases of intentional data misuse were identified.

Further information on legal proceedings related to data protection and marketing and communication violations are presented in Governance [G1-M] subchapter.

### 3.2.8 Reporting policy

**Compensation:** The amount of compensation for clients does not include refunds for transactions.

**Complaints:** Complaints include any oral or written objections in which the complainant, whether or not in a business relationship with the Bank, expresses dissatisfaction with the Bank's products, services, or the conduct of its department or member of staff. Complaints also include any objections raised by the client regarding the Bank's or the Customer's actions or omissions prior to the conclusion of the contract, in connection with the conclusion of the contract, the performance of the contract by the Bank or the Customer, the termination of the contractual relationship or the subsequent settlement of a dispute concerning the contract.

**Legitimate complaints:** Legitimate complaints include any oral or written objections in which the complainant, whether or not in a business relationship with the Bank, expresses dissatisfaction with the Bank's products, services, or the conduct of its member of staff or department. Legitimate complaints also include objections raised by the client regarding the Bank's or the Customer's actions or omissions prior to the conclusion of the contract, in connection with the performance or termination of the contract, or settlement of disputes arising thereafter.

**Closed complaints:** Closed client complaints are those cases where the investigation has been completed, the client has been informed, and no further comments or objections have been received from the client. Closure may be by resolution, compensation or by informing the client that the complaint is not justified. The purpose of the closure is to finalise and document the complaint handling process.

**Misuse of data:** Misuse of personal data is an event in which clients' personal data is compromised as a result of unauthorised access, unauthorised use, leakage, loss, or theft, and the incident arises within the organisation's sphere of interest, i.e., it is caused by the organisation's fault.

**Fraud:** Fraud is any intentional deception aimed at obtaining an unlawful advantage to the detriment of the Bank or its clients, including the use of false data or documents or any other unlawful act (for more information, see the Anti-Fraud Policy of OTP Bank Plc. and OTP banking group)

## 4 Governance information

OTP Group's fundamental principle is to provide financial services through compliant operations and to pursue ethical business conduct. Ethical standards, anti-corruption and anti-fraud principles, whistleblowing systems and internal control mechanisms are established to ensure legal compliance and reduce risks in corporate governance. The Group's operations are based on long-term commitment to shareholders and responsible behaviour to fulfil legal obligations that serve best interests of their employees, clients, and investors. Thus, particular emphasis is placed on transparency, regulatory compliance, risk management, preventive measures, and the availability of adequate internal and external reporting channels. Raising awareness of fraud detection, promoting ethical standards and compliant business conduct among employees and sales agents are core priorities for the Group.

### 4.1 [G1] Business conduct

OTP Group has identified the following material IROs (risks) in relation to corporate culture double materiality assessment (2025). Further details are presented in ESRS 2, [SBM-3] subchapter.

G1 - BUSINESS CONDUCT			
Material sustainability matters	Identified IRO (category: (+/-) I: positive/negative impact, R: risk, O: opportunity, name and description)		
Own operations - Financial services			
Corporate Culture	R	Weak ethical culture or business misconduct	Potential cases of unethical behaviour or non-compliance with laws and regulations can result in fines and reputational damage (e.g. cases of corruption and bribery, violation of competition rules, etc.). Sales agents, as representatives of OTP Group, pose a higher risk of misconduct as they are not directly supervised, but fulfil contractual obligations for the organisation, even though they must follow the Group's ethical rules.
	R	Money laundering and counterterrorism	Failure to adequately address money laundering and counterterrorism could sustain or even increase criminal activities, terrorist threats, undermine customer trust, and lead to regulatory sanctions and reputational damage for OTP Group.

#### 4.1.1 [GOV-1] The role of the administrative, supervisory and management bodies

The role of administrative, supervisory, and management bodies in business conduct along with their expertise on business conduct matters, is presented in subchapter ESRS 2 [GOV-1] and in Appendix: *The professional experience of the members of the Supervisory Board and the Board of Directors (governing bodies)*.

#### 4.1.2 [IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

The process for identifying material impacts, risks, and opportunities related to business conduct was part of OTP Group's DMA process for the reporting year and it is described in detail in ESRS 2, [IRO-1] subchapter.

#### 4.1.3 [G1-1] Business conduct policies and corporate culture

OTP Group has multiple policies and operative instructions in place, which aim to provide a framework for corporate culture, guide ethical business conduct, and control risks associated with fraud attempts and unethical behaviour. Regulatory compliance is particularly important for the Group, since financial institutions' operations are highly regulated by EU and national legislation.

The Group's core policies related to managing identified material risks of business misconduct, money laundering and terrorism financing – are further described in this section – include the Code of Ethics, Partner Code of Ethics, Compliance Policy, Sanctions Compliance Policy, Anti-Money Laundering and Counter-Terrorism Financing Policy (AML and CTF), and Anti-Corruption Policy.

The complete governance policies of OTP Group listed above or their relevant extracts, are available on OTP Group's website under Due Diligence Information<sup>70</sup>. Besides the Banking group's internal policy library, the Group provides information on policies – including core ethical principles and compliant behaviour – for its own employees through intranet news and articles, branch level knowledge management, conferences, e-learning modules and through the network of compliance officers. For external stakeholders (clients, investors), information is provided through the website and other interactive channels, such as social media websites, and international conferences.

Expert organizational units of the Group, as core operative stakeholders, have reviewed and shared their comments and suggestions on compliance policies during the design phase and they are responsible for providing up-to-date information on modifications, related to their operational areas.

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<sup>70</sup> <https://www.otpbank.hu/portal/hu/rolunk/duel-diligence>

Summary table of main policies in relation to material IROs:

Material sustainability matters	Key content	Scope	Accountability	Third party standards
<b>Code of Ethics / Partner Code of Ethics</b>				
<p><i>Corporate culture</i></p> <p><i>Money laundering and counterterrorism</i></p>	<p>The Code of Ethics is the core guiding policy for OTP Group's ethical operations, setting out principles and expectations for ethical business conduct. It defines OTP Group's values, standards of ethical behaviour and the Group's business ethics commitments - information security, data protection, anti-corruption, fraud prevention, rules on gifts, compliance with ethical standards and details of the ethical reporting system. The sections and provisions of the Code are continuously updated to reflect changes in the working environment.</p> <p>In 2025, OTP Group amended its Code of Ethics to ensure compliance with the EU Artificial Intelligence Act and to address challenges arising from AI-driven technological advancements within an ethical framework. The amendment introduced a new chapter on ethical AI use and application of core ethical principles.</p> <p>All OTP Group employees (both external and internal - executives, staff, and agents) are expected to perform their work in full compliance with ethical and professional standards.</p> <p>The purpose of the Partner Code of Ethics is to provide clear and unambiguous guidelines and expectations for those who have a relationship with OTP Group regarding ethical business conduct.</p> <p>Further details on the Group's Code of Ethics and Partner Code of Ethics are presented in subchapter [S1-1].</p>	OTP Bank and OTP Group	Supervisory Board and Board of Directors, Ethics Committee, Supported by compliance, legal and HR departments	<p>The Code of Ethics is based on international standards, best practices, and operational experience:</p> <ul style="list-style-type: none"> <li>• the International Code of Human Rights</li> <li>• the OECD Guidelines for Multinational Enterprises</li> <li>• the UN Global Compact</li> <li>• the core conventions of the International Labour Organization (ILO)</li> <li>• the UN Guiding Principles on Business and Human Rights</li> </ul>
<b>Compliance Policy</b>				
<p><i>Corporate culture</i></p> <p><i>Money laundering and counterterrorism</i></p>	<p>The Compliance Policy summarizes the principles of independent compliance activities, which collectively define, promote, and support proper, legal, safe, and prudent operations. These principles are based on the expectations and guidelines formulated by senior management, considering applicable laws, regulatory guidelines, and internal regulations. It provides the framework for operating the compliance function and requires each Group member to develop its own local-level compliance policy and ensure the necessary tools for implementation, in alignment with OTP Bank's principles and respective subsidiaries' national legislation.</p> <p>In line with responsible corporate governance, the Bank applies guidelines that promote compliance with internationally recognized rules and standards of responsible corporate management, ensuring transparency and accountability through the public disclosure of information related to its management and operations.</p>	OTP Bank and banking and other financial services provider subsidiaries	Supervisory Board and Board of Directors, Supported by compliance, and legal departments	<p>The Bank establishes and operates internal defence and security lines based on the main principles and requirements defined in the Hungarian National Bank's Recommendation. This is in line with the guidelines of European financial supervisory authorities and the recommendations of international financial regulatory bodies.</p>
<b>Sanctions Compliance Policy</b>				
<p><i>Corporate culture</i></p> <p><i>Money laundering and counterterrorism</i></p>	<p>Given the Group's international presence, a unified <b>Sanctions Compliance Policy</b> ensures compliance with EU, UN Security Council, UK, US, and other relevant national sanctions. This includes restrictions on transactions with sanctioned entities and the prohibition of activities that could violate or circumvent sanctions. Customers and transactions are screened against multiple sanctions lists, with enhanced procedures applied to sensitive transactions.</p>	OTP Bank and banking and other financial services provider subsidiaries	Supervisory Board and Board of Directors, Supported by compliance, and legal departments	According to EU, UN Security Council, UK, US, and relevant national sanctions.

Material sustainability matters	Key content	Scope	Accountability	Third party standards
<b>Anti-Money Laundering and Counter-Terrorism Financing Policy</b>				
<i>Money laundering and counterterrorism</i>	<p>OTP Bank has defined group-level requirements, procedures and workflows related to AML/CFT activities. As the parent bank, it operates a control mechanism covering the Group's subsidiaries to ensure the effective implementation of group-level risk management and preventive measures.</p> <p>The objective of OTP Group's AML/CFT framework is to prevent and mitigate the laundering of criminal proceeds and the financing of terrorism. The Policy requires the Group to conduct a comprehensive, group-level ML/TF risk assessment—reviewed at least annually—to identify, analyse, assess and manage related risks. The Group also assigns customers to predefined risk categories and applies customer due diligence measures proportionate to their respective risk level. In line with the “Know Your Customer” principle, customer due diligence procedures support the creation of customer profiles and the detection of transactions that deviate from expected behaviour, with reporting to the Financial Intelligence Unit (FIU) where necessary. AML/CFT requirements are mandatory across the Group, and any deviations may only be authorised by the Parent Bank in justified cases driven by local legal requirements, supervisory expectations or regulatory guidance.</p>	OTP Bank and banking subsidiaries	Supervisory Board and Board of Directors, Supported by compliance, and legal departments	The policy is designed to comply with the external regulations governing the prevention and combating of money laundering and terrorism financing, as well as the financial and asset restrictive measures imposed by the European Union and the United Nations Security Council, and the relevant sections of the General Business Rules.
<b>Anti-Corruption Policy</b>				
<i>Corporate culture</i>	<p>OTP Group is committed to combating corruption and has declared zero tolerance for all forms of bribery and unfair advantage. OTP Group 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.</p> <p>The Policy sets out the key principles governing the Group's anti-corruption activities, identifies areas with elevated corruption risk, and serves as a foundational document for developing internal regulations and guiding the anti-corruption responsibilities of relevant employees. The provisions of this Policy must be applied in conjunction with the Group-level Code of Ethics and the Partner Code of Ethics.</p>	OTP Bank and banking and other financial services provider subsidiaries	Supervisory Board and Board of Directors, Supported by compliance, and legal departments	The provisions of the Anti-Corruption Policy have been developed in accordance with the applicable domestic and international anti-corruption laws and the Wolfsberg Group Anti-Corruption Guide

OTP Bank, as the parent credit institution of the Group, is responsible for ensuring prudent operations and compliance with risk-taking, liquidity, and capital adequacy standards across all banking subsidiaries. OTP Bank’s mission is to operate a transparent, prudent, effective, and efficient Group, based on uniform principles, while also considering the specific characteristics of each banking subsidiary. This model aims to follow the transparent goals and principles of the parent company, maintain controlled autonomy for banking subsidiaries, and ensure prudent operations in alignment with EU, national and sectoral legislation and requirements. In this governance model, a shift towards deeper integration can be observed, with OTP Bank exercising strategic control and providing professional and functional guidance, in cooperation with banking subsidiaries, to ensure the achievement of strategic objectives and the enforcement of owner’s interests.

OTP Group’s core values are established, developed, promoted, and evaluated through the Group’s governance matrix model, which is uniformly applied by the Hungarian and foreign subsidiaries and serves as a model for most parent companies directly held by OTP Bank (other than banking subsidiaries).

The core elements of the Governance Matrix Model include:

- Ownership Governance
- Professional Field Governance
- The organisational unit responsible for the proper functioning of the Group Governance Model

To provide financial and investment services in compliance with statutory provisions, the Group’s internal control functions (risk management, compliance, and internal audit) along with supporting operational areas, play a crucial role in prudent operations. Internal policies, preventive actions and control procedures are designed to comply with strict regulatory standards and effectively mitigate potential risks of unethical or fraudulent behaviour, in alignment with the requirements of external supervisory authorities. The presented policies, along with the following measures and actions, are implemented to ensure compliant business operations and enforce ethical principles within the organization.

**4.1.4 [G1-A] Actions to promote corporate culture and ethical business conduct**

G1 - BUSINESS CONDUCT			
Material sustainability matters	Identified IRO	Group-level target (financial segment)	Group-level actions (financial segment)
Own operations - Financial services			
Corporate Culture	R	Weak ethical culture or business misconduct	No available target
	R	Money laundering and counterterrorism	No available target

**Whistleblowing system**

OTP Group’s Code of Ethics and Partner Code of Ethics, supported by Compliance Policies, outline core ethical principles and mechanisms for identifying, reporting, and investigating concerns about unlawful or unethical behaviour. To promote awareness of ethical standards and ensure responsible business conduct within the organization, OTP Group operates a whistleblowing system and provides regular ethics training to employees, that is further described in the next subchapter.

Multiple channels are available for employees and third parties to raise concerns about unlawful behaviour or behaviour in contradicts of Code of Ethics or Compliance Policies. Ethical reports can be submitted to OTP Bank's Compliance Directorate:

- In person during working hours (by appointment) or by letter, telephone or e-mail
- Online via the Ethics and Whistleblowing Platform (<https://www.otpgroup.info/ethical-breach-and-whistleblowing/form>)
- By contacting the compliance department of the relevant OTP Group member.

Reports may also be submitted anonymously. Issues raised through these channels are investigated in accordance with the Group's internal compliance procedures and within the timeframes defined by applicable national legislation. Notifications, requests, and investigations are always treated confidentially by OTP Group members, in compliance with applicable statutory regulations and internal rules, ensuring the protection of the whistleblower<sup>71</sup>. The Code of Ethics prohibits any retaliatory measures or negative consequences against anyone who reports a violation of the rules and ethical values in good faith.

The Group acknowledges written reports submitted through the whistleblowing system within seven days and provides general information on applicable procedural and data-processing rules in alignment with the Act XXV of 2023 on Complaints, Whistleblowing and the Rules for Reporting Abuse (Whistleblowing Act).

Investigations are initiated without delay and are generally completed within 30 days of receipt. In justified exceptional cases, this timeframe may be extended, when the whistleblower shall be informed about the reason for the extension and the expected completion date. The investigation period shall not exceed three months.

Whistleblowers are informed in writing about the outcome of the investigation or, where applicable, the reasons for not pursuing the report. Written notification may be omitted if the whistleblower has been informed verbally and has acknowledged receipt of the communication.

All participants involved in the whistleblowing procedure are required to act independently, fairly, and in full compliance with the provisions of the Code of Ethics. The reported person also has the right to present their position personally or through legal representation and to provide supporting evidence.

In accordance with the procedural rules of the whistleblowing system, the Head of the Ethics Department is responsible for deciding based on the investigation report, whether the first-instance procedure should be closed and whether the conduct examined constitutes a legal violation and/or a breach of the Code of Ethics. As part of this decision-making process, recommendations, corrective or disciplinary actions, and preventive measures may be formulated to avoid future breaches and to reduce associated compliance risks.

If any party concerned by the report, disagrees with the findings or conclusions of the investigation (first-instance procedure), they are entitled to request a review. This request must be submitted in writing to the Ethics Committee, which acts as the second-instance decision-making body. The request must be filed through the designated reporting channels within 15 days of receiving the first instance decision. The Ethics Committee then examines the appeal and issues a final decision based on the available evidence and applicable internal regulations.

If legally required (under applicable law and statutory conditions), the Ethics Department initiates proceedings with the competent authority. In cases where circumstances justify a criminal complaint, actions are taken in consultation with the Security Directorate. The Head of the Ethics Department immediately informs the CEO and the Supervisory Board if reports concern senior executives or managers, chief executives of subsidiaries, or the Compliance Directorate.

Within the ethical reporting framework, incidents, including cases of corruption and bribery, can also be investigated promptly, independently, and objectively outside the formal whistleblowing platform. If such reports are received by the Compliance Directorate, they must immediately inform the Ethics Department, which determines whether the case must be classified as an ethical procedure. Once classified, the investigation is conducted in accordance with the established rules and processes presented.

<sup>71</sup> Information on Whistleblower protection is available here: [https://www.otpgroup.info/static/sw/file/Bejelentok\\_vedelmerol\\_szolo\\_tajekoztato\\_EN.pdf](https://www.otpgroup.info/static/sw/file/Bejelentok_vedelmerol_szolo_tajekoztato_EN.pdf)

## Ethics training

OTP Group emphasizes the importance of fostering a common understanding among employees on ethical norms and providing guidance on rules and principles of ethical business conduct. To ensure adequate knowledge of Code of Ethics and the whistleblowing system, the Group conducts annual mandatory ethics training for all employees, including sales agents as well, who must complete the training within 42 days after contracting. The purpose of the ethics training is to provide detailed information about ethical norms and responsible business conduct through group-level guidelines and practical examples. The training material provides comprehensive guidance on expected ethical behaviour and include, among others the following topics:

- Ethical norms and principles
- Compliance with the Code of Ethics and legal requirements
- Responsible business conduct within and outside the organization
- OTP Group's business ethics commitments (e.g. responsible corporate governance, fraud prevention, zero tolerance for corruption, respect for human rights, fair employment practices, mutual respect and cooperation)
- Whistleblowing channels

The Group annually reviews and monitors employees' understanding of ethical principles and adherence to these norms.

The role of managers is essential in promoting ethical standards of behaviour, therefore they participate in dedicated annual leadership training. This training supports them in addressing any issues that may arise in relation to ethical matters. Key topics include: the importance of leading by example, managerial challenges in forming collaborative working environment, equal treatment, and the management of conflicts of interest.

The Code of Ethics defines additional obligations for OTP Group's leaders. Managers at OTP Group 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 consider the principles of OTP Group Code of Ethics in all decisions and actions. It is particularly important that managers set an example in terms of appropriate tone, language, actions, and gestures in communication.

Managers should make every effort to ensure that employees are aware of the rules of the Code of Ethics, support employees in raising ethical issues and concerns in good faith and protect them from any retaliation for doing so. OTP Group managers will use all 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.

The performance and attendance of ethics trainings within the group are monitored by the respective compliance function. Their aim is to ensure that all new joiners receive appropriate knowledge of the Code of Ethics' principles and behavioural norms by induction compliance training and also provide appropriate knowledge for all other employees through mandatory, annual trainings. The Compliance function also provides supplementary trainings for all employees, to ensure up-to-date knowledge on newly implemented rules or systems. Training plans and materials are developed and revised annually, in accordance with compliance risk assessment, regulatory obligations, and internal expectations.

## Prevention of corruption and bribery

OTP Group is committed to combating corruption and has declared zero tolerance for all forms of bribery and the gaining of unfair advantages. The Group's core principles and behavioural requirements for preventing cases of corruption or bribery are outlined in the Anti-Corruption Policy, that should be implemented in conjunction with the Code of Ethics and Partner Code of Ethics (policies are described in detail in subchapter [G1-1]).

The Anti-Corruption Policy identifies activities and areas that are more exposed to corruption or bribery risks, including all organizational units and operational areas that are involved in the following activities:

- Management of gifts and business hospitality expenses
- Charity and sponsorship
- Liaising with contractual partners
- Undertaking contractual obligations
- Purchase, management and maintenance of investments and assets

- Hiring new staff
- Procurement, management and sale of real estate

Based on compliance risks (including corruption) and integrity/conflict of interest rules, the functions within the business that are most exposed to corruption and bribery are:

- Procurement & supplier management (incl. pre-qualification and anti-corruption clauses)
- Business development/sales and contracting
- Outsourced activities and external advisers' management
- Personal transactions and information barriers related to investment services (conduct risk, conflicts of interest)
- Correspondent banking and external relationships
- Digital Procurement and Logistics Management, and
- Branch networks and related operational management concerning such activities.

The appropriate management of such exposures is supported by group-level compliance governance through the relevant group-level policies and minimum standards.

The lists above are non-exhaustive; the organizational units and activities of the subsidiaries may be subject to different risk levels. Therefore, the Group also monitors other activities and business functions where corruption risks could arise. OTP Group performs a risk-based assessments at predefined intervals to determine which organisational units and activities are in the current focus of the anti-corruption activity.

OTP Group has established detailed rules and procedures to ensure the efficient enforcement of the provisions set out in the Anti-Corruption Policy. The core procedural and operational principles to prevent cases of corruption or bribery:

- Avoiding the concentration of decision-making powers in one person's hands; subsidiaries define staff members' roles and responsibilities by officially specifying the responsibilities and clearly designating decision-making levels.
- The Group establishes formal procedures for the performance of specific activities by individual staff members and requires the application.
- In accordance with and to the extent permitted by legal provisions, the Group monitors the activities and transactions of individual staff members.
- In all cases required by relevant policies, the Group expects staff members to make their decisions based on predefined criteria.
- Inclusion of anti-corruption clause in all contractual relationships and regulatory documents (e.g. tendering). Any deviation from this requirement is permitted only in exceptional cases, based on an individual assessment by the contracting department, which assumes full responsibility and risk. Such deviations must be reported to the compliance function with justification. The gradual extension of this clause to all significant Hungarian Group members was completed in 2025, and for the subsidiaries is planned for 2026.

Group members are expected to adopt these rules, integrate contractual provisions, implement relevant processes, and ensure consistent compliance. The compliance function of each subsidiary monitors the enforcement of the Anti-Corruption Policy in operational activities, as well as compliance with the applicable legal regulations and any other requirements. If any anomaly or irregularity is detected, review of the provisions shall be initiated and also notification of management bodies. Governing bodies monitor implementation through annual reports in compliance with the expectations of the Anti-Corruption Policy.

OTP Bank's Compliance function continuously monitors and quarterly reports on the implementation of anti-corruption measures, according to defined methodology, which is applied progressively. These investigations are ongoing and focus on high-risk areas (e.g. supplier and agent activities).

General training and awareness practices related to corruption and bribery are part of the annual ethics training, as described above. Ethics training includes anti-corruption topics and is mandatory for all OTP Group employees, ensuring full coverage of functions exposed to corruption and bribery risks.

Violations of the provisions set out in the Anti-Corruption Policy may be reported through the channels defined in the Code of Ethics and the Partner Code of Ethics. Investigations are carried out in accordance with the procedure governing the operation of the whistleblowing system.

In accordance with the Group's Conflict of Interest Policy, corruption and bribery allegations and cases are handled with a clear separation between the investigated party and the investigator. It is a fundamental business interest and legal obligation of OTP Group to ensure that the personal interests of its senior executives, members of its governing bodies, and employees do not conflict with the business interests and commitments of OTP Group or its clients.

### Ensuring compliance with sanctions and sensitive transactions

OTP Group applies a Sanctions Compliance Policy aiming to ensure compliance with applicable economic, financial and trade sanctions laws, regulations and embargo provisions imposed by the EU, the UN, the competent authority of the UK and the government of the U.S. The Group ensures compliance with sanctions and restrictive measures by taking local laws into consideration, and each member of the Group considers the national sanctions laws applicable to it.

The Group has implemented sanctions procedures that define minimum standards. These are designed to ensure that the members of OTP Group comply with the obligations applicable to them and the principles set out in the Sanctions Compliance Policy. OTP Group's members follow, among others, the standards and procedures listed below:

- **Screening of customers and transactions:** Screening of customers and transactions against at least, but not limited to, the sanction lists of the EU, the UN, the UK and the U.S. or in case of a particular member of OTP Group, the national list of persons subject to asset freezes.
- **Prohibiting or restricting business activities:** Prohibiting or restricting (i) business activities, (ii) the provision of financial and investment products or services, or (iii) the facilitation of transactions that may violate the applicable sanctions laws and regulations. The additional purpose of these prohibitions is to prevent any involvement in transactions and business conducts that could be aimed at circumventing or avoiding directly or indirectly the applicable sanctions. Restrictions may prohibit, among other things, business activity with sanctioned individuals or entities, or any activity directly or indirectly involving countries or territories subject to comprehensive sanctions (including Cuba, Iran, North Korea, and Syria, non-government-controlled areas of Ukraine: the Crimea, Donetsk, Kherson, Luhansk and Zaporizhzhia provinces (also considering possible changes over time)).
- **Risk appetite:** the Bank and its subsidiaries concerned may in their sole discretion refuse to provide financial and investment products or services or facilitate transactions even if they are permitted by applicable sanctions laws and regulations, but the activity would not be in line with OTP Group's Sanctions Compliance Policy or risk appetite.

OTP Group applies appropriate internal rules for the assessment of relevant clients and transactions concerned.

### Fraud prevention

OTP Group applies a zero-tolerance policy toward fraud, using a risk-based approach with proactive monitoring and 24/7 incident response. Measures include AI-driven detection, behavioural analytics, real-time monitoring, employee and customer awareness programs, and cooperation with authorities.

OTP banking group's Anti-fraud Strategy's objectives focus on increasing prevented-fraud ratios, strengthening customer trust, integrating the Central Fraud Screening System, and enhancing cybersecurity. Activities cover prevention, detection, rapid response, deterrence, and risk analysis. Governance is centralized under the Security Directorate's group unit, which processes incidents, shares intelligence, and supports implementation of security and fraud-prevention standards across the Banking group. Maturity differences among subsidiaries are addressed through best-practice sharing, policy implementation, and capability standardization.

Information sharing is enabled by the Fraud Information Sharing (FIS) platform, complemented by alerts on new fraud patterns and thematic workshops. From 2025, emphasis shifted to practical control assignments and evidence-based maturity assessments.

#### 4.1.5 [G1-A] Actions on anti-money laundering and combating the financing of terrorism (AML/CFT)

##### AML/CFT risk assessment

To effectively prevent the laundering of assets derived from criminal activities, as well as the financing of terrorism, and to comply with national and international legal and supervisory requirements, in relation to anti-money laundering and combating the financing of terrorism (AML/CFT), the Group's compliance function has developed comprehensive internal guidelines and robust risk management procedures.

To identify, analyse, assess and manage money laundering and terrorist financing risks, banking subsidiaries perform a group-level AML/CFT risk assessment, which is reviewed annually.

The Group assigns its customers into risk categories and applies customer due diligence measures corresponding to the respective risk level. By applying the 'Know Your Customer' principle, banking subsidiaries establish customer profiles and screen suspicious transactions that do not fit this profile. The Compliance Directorate exercises control over the acceptance of high-risk categorized clients and has a veto right. Where necessary, the compliance function submits a report to the Financial Intelligence Unit (FIU) and can decide to terminate the business relationship.

##### AML/CFT training

To raise awareness on money laundering and counter-terrorism financing-related risks and preventive measures, OTP Group organizes regular trainings (annual general training) for relevant employees, and additional (more detailed, specialized) yearly training for those whose function is more exposed to fraudulent activities (i.e. those with more active interaction with customers). AML trainings are usually delivered online, and occasionally in-person sessions are also held. The training content includes an overview of the regulatory environment, provides current updates and case studies, and concludes with an assessment. OTP Group tracks the completion of the mandatory AML/CFT training and takes measures – such as additional reminders - to ensure total completion. The scope of employees required to complete the training differs among subsidiaries:

- Annual mandatory training for all employees: OTP Bulgaria, OTP Slovenia, OTP Uzbekistan, OTP Albania, OTP Moldova, OTP Ukraine, OTP Russia, Merkantil Bank, OTP Factoring Plc
- Annual mandatory training for employees and their managers who are engaged in AML/CFT-related activities and interact with customers (based on the AML/CFT Act and national regulatory requirements):
  - At OTP Bank employees are exempt from the annual AML training if they do not engage in activities related to preventing money laundering or terrorist financing, do not serve clients, have no access to banking systems, or have completed orientation training after June 1, 2025. According to MNB Regulation 14/2025 (VI.16.), training is mandatory for managers and staff involved in AML, counter-terrorist financing, and activities related to EU and UN financial sanctions. In 2024, the AML training was updated with two target groups based on job roles in SuccessFactors-JDMS:
    - Group 1 – “Normal” training: Employees heavily involved in AML/CTF, including front office staff, their managers, and support roles, as well as security, legal, compliance, and audit teams. In 2025, 5,798 employees were assigned to this training.
    - Group 2 – “Basic” training: Employees in back-office roles, their managers, and OTP Bank's strategic and executive leaders. In 2025, 4,354 employees were assigned to this training.

New hires must complete AML orientation within three weeks of joining. Regional employees attend “Orientation Normal,” others attend “Orientation Basic.” Front office staff in retail and SME roles must also join an online consultation before starting work.

- OTP Bank Serbia complies with the Law on Prevention of Money Laundering of the Republic of Serbia, which requires training for employees establishing business relationships and conducting transactions. In 2025, 1625 employees were assigned to this training.

- OBH (Croatia) also follows legal requirements by providing training to customer-facing employees and senior management. In 2025, 1,337 employees were assigned to this training.
- The AML/CTF training program of CKB Group (Montenegro) is intended for employees exposed to money laundering and terrorist financing risks in their daily work. It includes branch employees, staff in the Global Markets and Service Directorate, and Corporate Directorate employees who communicate directly with clients. It also covers employees responsible for national and international payment operations, those involved in client-related activities or transactions, and newcomers in these areas. Additionally, it applies to employees in Compliance, Internal Audit, General Security, and Operational Risk departments, as well as members of the Management and Supervisory Board. In 2025, 325 employees were assigned to this training.
- Az OTP Life Annuity and Real Estate Investment Plc. AML training is mandatory for colleagues involved in processes related to property leasing or sales as part of their work. In 2025, 5 employees were assigned to this training.

To further enhance AML awareness, OTP Group shares information on proper customer due diligence processes and potential fraudulent behaviour and actions on a regular basis, through internal channels (intranet, newsletters).

Besides, OTP Bank Slovenia applied a Customer acceptance policy (CAP), a document that defines the basis on which the Bank enters into relationships with its customers. OTP Bank Slovenia will accept only those customers whose identity is established by conducting due diligence appropriate to the risk assessment of the customer.

#### **AML whistleblowing system**

OTP Group operates a dedicated whistleblowing system for reporting unlawful conduct related to the prevention and detection of money laundering and terrorist financing. In case of any breaches detected against Anti-Money Laundering and Counter-Terrorism Financing Act (the AML/CTF Act), employees can submit anonymous notifications through a dedicated whistleblowing system, which is operated on a continuous basis for this purpose. Investigations are performed by the AML/CTF department and are carried out within 30 days. For reports involving AML/CTF department's employees, the investigation is conducted by a designated employee recommended by the Head of the Compliance Directorate. The designated employee of the AML/CTF department prepares a report on the outcome of the investigation, including proposed actions, deadlines, and responsible parties. The report on the outcome of the investigation is approved by the Head of the Compliance Directorate, who ensures proper implementation of mitigation measures. If legally required (under applicable law and statutory conditions), the designated employee promptly proceeds with the competent authority.

#### **4.1.6 [G1-M] Metrics related to material risks on business conduct**

##### **Legal Procedures**

The below table summarizes the closed regulatory procedures, and the amounts of fines paid by OTP Group in the reporting period. There are pending legal issues and tax litigation at the balance sheet date, which are disclosed in Note 24 Provisions and other liabilities and Note 39 Off-balance sheet items and derivative instruments of the Consolidated financial statements. Proceedings have been initiated against OTP Bank Plc. for violation of competition law rules. The regulatory practices of individual countries can differ significantly, which contributes to the significant differences in the number of procedures.

In 2025 there were no significant cases resulted with non-monetary sanction within OTP Group.

GRI 2-27 Closed proceedings by authorities, and other legal procedures, fines paid, OTP Group – 2025						
	All closed cases	Number of significant cases	All cases closed with fines	Total fine paid	Fine charged for practice applied in 2025	Fine charged for practice applied in earlier period
	pcs			HUF million		
violation of competition rules	3	0	3	3.6	3.6	0
violation of consumer protection rules	209	1	27	49.3	10.5	38.8
violation of rules on equal opportunity (own workforce)	0	0	0	0	0	0
violation of rules on equal opportunity (not own workforce)	0	0	0	0	0	0
violation of accessibility rules	0	0	0	0	0	0
supervisory procedures	71	3	32	127.6	85.5	42.1
violation of IT security / Cyber security rules	0	0	0	0	0	0
violation of taxation rules	6	0	4	84.6	84.3	0.3
violation of environmental rules	1	1	1	0.1	0.1	0
violation of marketing communication rules	4	0	1	0.8	0.8	0
violation of information provision rules	8	1	4	1.8	1.8	0
violation of marketing communication and information provision rules	2	0	0	0	0	0
violation of data protection rules	5	0	0	0	0	0
violation of anti-corruption and anti-bribery rules	0	0	0	0	0	0
violation of labour law, health and safety rules	17	0	6	19.9	19.9	0
other proceedings	30	1	28	12.3	9.5	2.7
<b>Total 2025</b>	<b>356</b>	<b>7</b>	<b>106</b>	<b>300</b>	<b>216.1</b>	<b>83.9</b>

GRI 2-27 Closed proceedings by authorities, and other legal procedures, fines paid, OTP Group – 2024						
	All closed cases	Number of significant cases	All cases closed with fines	Total fine paid	Fine charged for practice applied in 2024	Fine charged for practice applied in earlier period
	pcs			HUF million		
violation of competition rules <sup>1</sup>	3	0	3	2.1	2.1	0
violation of consumer protection rules	256	0	55	69.3	28.5	40.8
violation of rules on equal opportunity (own workforce)	2	0	0	0	0	0
violation of rules on equal opportunity (not own workforce)	0	0	0	0	0	0
violation of accessibility rules	0	0	0	0	0	0
supervisory procedures	138	3	64	584.7	572.5	12.3
violation of IT security / Cyber security rules	0	0	0	0	0	0
violation of taxation rules	2	0	1	0.2	0	0.1
violation of environmental rules	1	0	1	0.4	0.4	0
violation of marketing communication rules	1	0	1	0.5	0.5	0
violation of information provision rules	6	0	6	6.6	6.6	0
violation of marketing communication and information provision rules	0	0	0	0	0	0
violation of data protection rules	19	1	3	215.0	6.5	208.5
Violation of anti-corruption and anti-bribery rules	0	0	0	0	0	0
violation of labour law rules	6	0	0	0	0	0
violation of health and safety rules	1	0	1	0.3	0	0.3
other proceedings	5	0	0	0.2	0.2	0
<b>Total 2024</b>	<b>440</b>	<b>4</b>	<b>135</b>	<b>879.4</b>	<b>617.4</b>	<b>262.0</b>

The regulatory practices of individual countries can differ significantly, which contributes to the significant differences in the number of procedures.  
<sup>1</sup> This also includes cases related to violations of antitrust and monopoly rules.

Other significant procedures:

In 2025, the Hungarian National Bank (MNB) concluded supervisory procedures against OTP Bank regarding payment services and concerning its anti-money-laundering and counter-terrorist-financing practices (Pmt. compliance), imposing a HUF 54.6 million supervisory fine and ordering the Bank to implement extensive remedial measures across multiple areas where legal and regulatory breaches were identified.

In 2025, Croatian authorities concluded misdemeanour proceedings against OBH (Croatia) related to the unlawful contracting of cash-transport and valuables-processing services without the required security-services licence, imposing a total fine of HUF 31 million on the Bank (plus associated procedural costs), with the decision becoming final after OTP banka accepted the sanction and executed full payment.

### AML trainings

OTP Group regularly organizes trainings to ensure AML/CFT awareness and compliance within the organization, as detailed in subchapter [G1-A].

In 2025, the training was mandatory for 38,433 employees, which is 87.3% of the total workforce of OTP Group.

### Expected financial loss from loan fraud

The total financial loss resulting from detected loan fraud cases:

Expected financial loss from loan fraud, OTP banking group	
	2025
Total financial loss from loan fraud cases (million HUF)	5,260.4

#### 4.1.7 Reporting policy

**Anti-corruption and anti-bribery training:** In the case of anti-corruption and anti-bribery training programmes for employees working in high-risk functions (high exposure in terms of corruption, bribery or AML), the percentage of employees working in high-risk functions covered by these programmes should be calculated taking into account those employees who have completed the training programme during the reporting period and those who were assigned to complete the programme, regardless of whether they had completed it at the balance sheet date.

**Judgements closed:** The number of judgments closed for breaches of anti-corruption and anti-bribery regulations (OTP Group Code of Ethics) and the total amount of fines imposed in the reporting period do not include judgments that are subject to appeal or that are still pending at the balance sheet date.

**Cases of non-compliance:** In the case of non-compliance with laws and regulations, cases that were initiated following a request from or a report to the authority and were finally closed during the reporting period should be recorded.

**Cases closed with fines:** Data on the number of cases where a fine was imposed and the amount of the fine paid should be provided separately for the following cases. Fines for practices in the reporting period: the practice still in existence when the fine is imposed. Fines for practices relating to a previous period: the challenged practice was already discontinued in a previous year before the fine was imposed.

**Significant cases:** Significant legal non-compliance arises when the fine in a single case reaches HUF 10 million; or the fine in several cases involving the same practice reaches HUF 10 million; or the case does not normally involve the imposition of a fine but is considered otherwise by the competent professional area of the Group Member.

**Expected financial loss from loan fraud:** The amount of losses arising from various cases of loan fraud, determined on the basis of exposure at the time of the investigation of the case.

## 5 Appendix

### 5.1 The professional experience of the members of the Supervisory Board and the Board of Directors (governing bodies)

#### Senior management and executive members of the Board of Directors of OTP Bank

##### Internal members

Dr. Sándor Csányi:  
Chairman of the Board

From 1980 he worked at the Tax Revenue Directorate and then at the Secretariat (Banking Supervision Section) of the Ministry of Finance then from 1983 to 1986, he was Head of Department at the Ministry of Agriculture and Food Industry. From 1986 to 1989 he was a senior department head at the Hungarian Credit Bank (MHB).

From 1989 to 1992 he was Deputy CEO of K&H Bank.

From 1992 until May 2025, Chairman and Chief Executive Officer of OTP Bank Nyrt., from May 2025, Chairman of the Bank's Board of Directors.

He is Vice Chairman of the Board of Directors of MOL Plc. and Co-Chairman of the Chinese-Hungarian Business Council.

In 2022, through contributing 100% of the shares of Bonitás 2002 Ltd. and Hungerit Ltd. as well as substantial cash, he founded Unity Asset Management Foundation, which acts as his "Family Office" and manages sizable investments.

Bonitás 2002 Ltd. is the holding company that oversees his investments in agriculture, the food industry, real estate and asset management, which comprise some 240 directly or indirectly owned companies.

Bonitás 2002 Ltd. is one of the largest investors in agriculture and food industry in the CEE region through Bonafarm Group, Hungerit Ltd. and KITE Ltd. generating a total annual revenue of EUR 2.5 billion with more than 9,500 employees and with a total of 40,000 hectares of cultivated farmland. The Bonafarm Group is vertically integrated with agricultural companies producing the raw materials for food processors: Hungary's largest meat processor, Pick Szeged Co and MCS Vágóhíd Ltd., the dairy company Sole-Mizo Ltd. and the winery Csányi Pincészet Ltd. It also has significant investments in real estate and construction companies as well as in venture capital and real estate funds through the Bonitás Venture Capital and Real Estate Fund. The size of venture capital fund is EUR 20 million and the average VC investment is between EUR 900,000 and EUR 2 million, while the size of the real estate fund is EUR 80 million. Bonitás 2002 Ltd.'s portfolio also includes the largest Hungarian private hospital, BEK Ltd.

Péter Csányi  
Chief Executive Officer

He began his career in 2006 at Merrill Lynch's London office as an intern and he was working part-time on corporate finance projects for financial institutions while attending university as well.

From 2007 to 2011, he was an analyst in Deutsche Bank's London office and then a financial advisor in the field of corporate finance (for Central and Eastern European corporate customers).

From 2011-2016, he worked for McKinsey & Company Inc. as a senior consultant mostly working on banking related projects.

He joined OTP Bank in 2016 as managing director of the Digital Sales and Development Directorate. After the agile transformation at the Bank, he became responsible for the management of the Omnichannel Tribe from 2019. In addition, since January 2021, he was also headed the Daily Banking Tribe.

From March 2021, he has served as Deputy CEO of OTP Bank and Head of the IT Division (as of 1 May 2021 Digital Division) and the member of the Management Committee. Since July 2023 he is the Chairman of the Executive Steering Committee.

He has been a member of OTP Bank's Board of Directors since 16 April 2021 and has served as Chief Executive Officer since 1 May 2025.

Since 2020 he has been Chairman of the Supervisory Board of OTP banka d.d. in Croatia. He is also a member of the Board of Directors of PortfoLion Ltd. He is the head of the Digitalization Working Group of the Hungarian Banking Association and Vice President responsible for digital transformation of IVSZ, the IT Association of Hungary.

László Wolf

Deputy CEO

Commercial Banking Division

From 1983 after graduation, he worked at the Bank Relations Department of the National Bank of Hungary for 8 years, and then he was head of Treasury at BNP-KH-Dresdner Bank between 1991 and 1993.

From April 1993 he was managing director of OTP Bank's Treasury Directorate, and since 1994 he has been the head of Commercial Banking Division as Deputy CEO of OTP Bank Plc.

Since 2003 he has been a member of DSK Bank's Supervisory Board.

He has been a member of OTP Bank's Board of Directors since 15 April 2016.

Since 13 June 2023 he has been the Chairman of Supervisory Board of Ipoteka Bank.

**External members**

Tamás György Erdei

Deputy Chairman of the Board, BSc Business Administration

He began his professional career at OTP, in a variety of administrative roles (his last position was branch manager), before going on to work at the Ministry of Finance in bank supervision.

From 1983 he was employed by the Hungarian Foreign Trade Bank, where he gradually worked his way up through the ranks. In 1985 he became managing director, in 1990 he was appointed Deputy CEO, then in 1994 he became CEO, and from 1997 until the end of March 2012 he was Chairman & CEO.

Between 1997 and 2008, and between 2009 and 2011, he was the elected president of the Hungarian Banking Association. He is the Chairman of the Supervisory Board of the International Children's Safety Service.

He has been a member of OTP Bank's Board of Directors since 27 April 2012. He has been the Chairman of OTP Bank's Risk Assumption and Risk Management Committee, and he was a member of the Nomination Committee between 2014 and 2020.

He has been the Deputy Chairman of the Board of Directors of OTP Bank Plc. since April 2019 and the Chairman of the Work-out Committee since October 2019.

He has been Chairman of the Board of Directors at OTP Factoring Ltd. since December 2019.

Gabriella Balogh

Chemical engineer, MSc Economics, specialization in marketing

She worked as a marketing associate between 1993 and 1998, as director of the Marketing Department from 1998 to 2005 and as managing director of the Marketing and Sales Directorate between 2005 and 2008 at OTP Bank Plc.

She has been the managing director of GoodStep Consulting Kft. since 2008. She fulfilled group management tasks as a member of the Board of Directors at the Central European Media and Publishing Company between 2010 and 2017. She has been co-owner and Board of Directors member of Net Media Plc. since 2016. She is Presidium member and Chairwoman of the Marketing and Media Board of the Hungarian Football Federation. She is the Chairwoman of the Supervisory Board of Művészetek Palotája Ltd. Since 2023 she has been the Member of the Board of Directors of Richter Gedeon Plc.

She has been a member of OTP Bank's Board of Directors since 16 April 2021.

Mihály Baumstark

BSc Agricultural Business Administration, MSc Economics

He was employed by the Ministry of Agriculture and Food Industry between 1978 and 1989. When he left the Ministry, he was Deputy Head of the Investment Policy Department. Then he was managing director of Hubertus Bt., and from 1999 to 2011 he was deputy CEO and then Chairman & CEO of Csányi Winery Ltd. He is currently retired.

He was a member of OTP Bank's Supervisory Board from 1992 to 1999 and has been a non-executive member of OTP Bank's Board of Directors since 1999. He has been Chairman of OTP Bank's Ethics Committee since 2010, as well as a member of its Remuneration Committee since 2011. He was the member of the Nomination Committee between 2014 and 2020.

Dr. István Gresa

PhD Business Administration and Economics

He has been working in the banking sector since 1989. Between 1989 and 1993 he was branch manager of Budapest Bank's Zalaegerszeg branch.

From 1993 he was director of OTP Bank's Zala County Directorate, and from 1998 he was the managing director of the Bank's West Transdanubian Region.

From 1 March 2006 until 14 April 2016 – when he retired – he was Deputy CEO of OTP Bank Plc., the Head of the Credit Approval and Risk Management Division. He was Chairman of the Board of Directors at OTP Factoring Ltd. between 2006 and 2017.

He has been a member of OTP Bank's Board of Directors since 27 April 2012.

Antal György Kovács

MSc Economics

He began his professional career in 1990 at the Nagyatád branch of K&H Bank, where he worked as a branch manager between 1993 and 1995.

He has been working at OTP Bank Plc. since 1995, first as a county director and from 1998 as the executive director of OTP Bank's South Transdanubian Region.

From 1 July 2007 to 31 December 2022, he was the head of Retail Division as OTP Bank's Deputy CEO.

He has received additional training at the International Training Centre for Bankers and on various courses held by the World Trade Institute.

Between April 2007 and April 2012, he was Chairman of the Supervisory Board of OTP banka Hrvatska d.d.

He was the Chairman of the Supervisory Board of OTP Bank Romania SA from 12 December 2012, until the sale of the Romanian subsidiary bank in July 2024.

He has been Chairman of the Board of Directors of OTP Mortgage Bank Ltd. and OTP Building Society Ltd. since 24 April 2014.

From 2004 to 14 April 2016, he was a member of the Supervisory Board of OTP Bank. Between 15 April 2016 and 27 April 2023, he was a member of OTP Bank's Board of Directors, on 28 April 2023 the General Meeting of OTP Bank elected him as non-executive member of the Board of Directors.

György Nagy

Msc International Economics

He was a founding owner of Wallis Holding (founded in 1990) and he managed the Wallis Group as CEO until 2000. He founded Westbay Holding Kft. in 2004, the company's portfolio includes several successful investments.

He has been a member of OTP Bank's Board of Directors since 16 April 2021.

Dr. Márton Gellért Vági

General Secretary  
Hungarian Football Association

From 1987 to 2000 he was lecturer at University of Economic Science of Budapest (today Corvinus University of Budapest) and from 1994 onwards associate professor and head of department. He has a university doctorate and a PhD in economics. He has authored or co-authored more than 80 studies, essays and books.

Between 2000 and 2006 he worked at the State Holding and Privatisation Co. (ÁPV Ltd.) as managing director, Deputy CEO and then CEO.

Between 2006 and 2010 he was the Chairman of the National Development Agency.

In various periods between 2000 and 2010, he was the Chairman of the Board of Directors of Magyar Villamos Művek, Paks Nuclear Power Plant and the National Textbook Publishing House. Between 2002 and 2010, he was a member of the Board of Directors of Földhitel és Jelzálogbank Plc., and the Chairman of the Board of Directors for 4 years.

Since 2010 he has been general secretary of the Hungarian Football Federation.

He was a member of OTP Bank's Supervisory Board between 2011-2021. He was a member of OTP Bank's Audit Committee between 2014-2021. He was a member of OTP Bank's Nomination Committee between 2020-2021.

He has been a member of OTP Bank's Board of Directors since 16 April 2021.

Dr. József Zoltán Vörös

Professor emeritus, academician  
University of Pécs

He has been a member of the Hungarian Academy of Sciences since 2013. Between 1990 and 1993 he was the dean of the Faculty of Business and Economics, Janus Pannonius University (JPTE) in Pécs. In 1993 he attended a course in management for senior executives at Harvard University.

From 1994 he was a professor at JPTE, from 2021 he has been professor emeritus. He was the senior Vice Rector of the University from 2004-2007, between 2007 and 2011 he was the Chairman of the Economic Council of the University of Pécs.

He has been a non-executive member of OTP Bank's Board of Directors since 1992. He has been the Chairman of OTP Bank's Remuneration Committee since 2009, and member of its Risk Assumption and Risk Management Committee since 2014.

**Members of the Supervisory Board of OTP Bank Plc.**Tibor Tolnay

Chairman of the SB

From 1989 to 1994, he was the director of State Construction Company No. 21. From 1994 to 2015 he was the Chairman & CEO of the already privatized Magyar Építő Joint Stock Company.

He has been the managing director of Érték Ltd. since 1994.

Since 2022, he has been Chairman of the Supervisory Board of SEFAG Ltd.

From 2018 to 2021 he was the President of the National Association of Entrepreneurs and Employers, since 2021 co-President. From 2001 to 2015, Chairman of the National Association of Construction Entrepreneurs.

Since 1992 he has been a member of OTP Bank's Supervisory Board, and Chairman of the Supervisory Board since 1999. He was a member and Deputy Chairman of OTP Bank's Audit Committee between 2007 and 2011 and has been again since 2014. He has been the Chairman of OTP Bank's Nomination Committee since 2020.

Dr. József Gábor Horváth

Deputy Chairman of the SB  
Retired Lawyer

From 1983 he worked for the Hungarian State Development Bank. He has been a lawyer since 1986, and from 1990 to 2023 he run his own law firm, which was specialised in corporate finance and corporate governance.

He has been a member of the Supervisory Board of OTP Bank since 1995 and was a member of MOL Plc.'s Board of Directors between 1999 and 2014.

He has been Deputy Chairman of OTP Bank's Supervisory Board since 2007. He was Chairman of OTP Bank's Audit Committee between 2007 and 2011 and has been again since 2014.

He has been a member of OTP Bank's Nomination Committee since 2020. He was a member of the Board of Directors of INA Industrija Nafta d.d. from 2014 to 2018.

**Dr. Tamás Gudra**

BSc Business Administration, Lawyer

He worked as an auditor from 1993 to 2001 at Deloitte & Touche. Between 2001 and 2003 he was an accounting expert of subsidiaries at the Accounting and Tax Directorate of the Hungarian Oil and Gas Public Limited Company (MOL Rt). Then he was managing director at the Auditor, Financial and Accounting Directorate of the National Privatization and Asset Manager Plc. (ÁPV Ltd.) between 2003 and 2007 and became the director of Controlling Directorate at the Hungarian National Asset Manager Plc. (MNV Ltd.) from 2008 to 2010, then he worked as the CFO of the Hungarian Football Federation from 2011 until June of 2020. Between 2020 and 2024 he was the group-level CFO of Bonafarm Ltd. He has been the strategic advisor of OTP Pension Fund since May 2024.

He was a member of the Supervisory Board of OTP Lakástakarék Ltd. between 2012 and 2021 and he is Chairman of the Hungarian Paralympic Committee's Supervisory Board since 2016. Since 2021 he has been property inspector of Hungarian University of Agriculture and Life Sciences. Since 2022, he has been the asset controller of the Unity Asset Management Foundation.

He has been a member of the Supervisory Board and Audit Committee of OTP Bank since 16 April 2021.

**Catherine Paule Granger-Ponchon**

Groupama Assurances Mutuelles

She completed her studies at the Paris Institute of Political Studies and HEC (École des hautes études commerciales de Paris), where she specialized in finance.

Between 2000 and 2010, she worked at Citigroup's European investment banking division, where, as director of the financial institutions group, she participated in the acquisition and sale of several French banks and insurance companies. Subsequently, as head of M&A at Groupama SA, she led the group's divestment program, which included the sale of several subsidiaries.

From 2012 to 2017, she was head of corporate finance and M&A at Groupama SA, where she dealt with the group's external and internal financing, as well as the monitoring of strategic investments.

Between 2017 and 2024, she was the financial and risk director of Gan Assurances, Groupama's French subsidiary. From 2021 to 2024, she was deputy CEO responsible for finance, risk management, and strategy.

Since July 2024, she has been working at Groupama Assurances Mutuelle as deputy CEO, responsible for international subsidiaries.

Since 2025 she is a member of OTP Bank Supervisory Board and Audit Committee.

**Employees delegates**

**Klára Bella**

Director

Large Corporate Department

From 1992 to 1994 she worked as a clerk at the Fertőszentmiklós branch of OTP Bank.

From 1994 to 1995 she was a lending consultant at Polgári Bank.

From 1995 to 1996 she worked as a risk manager at the Central Branch of OTP Bank.

From 1996 to 1997 she was authorizer in the Credit Approval and Risk Management Division.

From 1997 to 2010 she was Deputy Managing Director at the Central Branch.

From 2010 to 2016 she was Director at the Central Branch.

Between 2017 and 2020, she was Director of the Corporate Directorate.

Since 1 July 2020, she has been the Director of the Large Corporate Department of the Specialised Finance Directorate.

She has been a member of OTP Bank's Supervisory Board, and representative of the Bank's employees since 12 April 2019.

András Michnai

President of OTP Bank's Employees' Trade Union

He has been an employee of the Bank since 1974, and until 1981 held a variety of posts in the branch network. Following this he held a management position in the central network coordination department before returning to work in the branch network. From 1994, as deputy managing director, he participated in the central coordination of the branch network. Between 2005 and 2014 he was the managing director of the Bank's Compliance Department.

He has been a member of OTP Bank's Supervisory Board, and representative of the Bank's employees since 2008. He has been President of OTP Bank's Employees' Trade Union since December 2011.

## 6 ESRS Index

56. ESRS Standard Code	ESRS Standard	Disclosure requirement code	Disclosure requirements	Reference to presentation of disclosures (page number)
ESRS 2	General Disclosures	BP-1	General basis for preparation of sustainability statements	86.
		BP-2	Disclosures in relation to specific circumstance	87.
		GOV-1	The role of the administrative, management and supervisory bodies	89.
		GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	91.
		GOV-3	Integration of sustainability-related performance in incentive schemes	93.
		GOV-4	Statement on due diligence	94.
		GOV-5	Risk management and internal controls over sustainability reporting	94.
		SBM-1	Strategy, business model and value chain	96.
		SBM-2	Interests and views of stakeholders	104.
		SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	106.
		IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	115.
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	118.		
ESRS E1	Climate Change	ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	121.
		E1-1	Transition plan for climate change mitigation	137.
		ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	120.
		ESRS 2 IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	121.
		E1-2	Policies related to climate change mitigation and adaptation	126.
		E1-3	Actions and resources in relation to climate change policies	127.
		E1-4	Targets related to climate change mitigation and adaptation	129.
		E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	155.
		E1-7	GHG removals and GHG mitigation projects financed through carbon credits	161.
E1-8	Internal carbon pricing	162.		
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Not yet reported due to phase-in		
ESRS E2	Pollution	ESRS 2 IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	117.
ESRS E3	Water and Marine Resources	ESRS 2 IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	117.
		E3-1	Policies related to water and marine resources	117.
		E3-2	Actions and resources related to water and marine resources	117.
		E3-3	Targets related to water and marine resources	117.
		E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	Not yet reported due to phase-in
ESRS E4	Biodiversity Ecosystem and	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	166-167.
		ESRS 2 IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	166-167.
		E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	166-167.
		E4-2	Policies related to biodiversity and ecosystems	166-167.
		E4-3	Actions and resources related to biodiversity and ecosystems	166-167.
E4-4	Targets related to biodiversity and ecosystem	166-167.		
ESRS E5	Resource use and Circular economy	ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	117.

56. ESRS Standard Code	ESRS Standard	Disclosure requirement code	Disclosure requirements	Reference to presentation of disclosures (page number)		
ESRS S1	Own Workforce	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	257.		
		S1-1	Policies related to own workforce	259.		
		S1-2	Processes for engaging with own workers and workers' representatives about impacts	262.		
		S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	263.		
		S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	264.		
		S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	268.		
		S1-6	Characteristics of the undertaking's employees	269.		
		S1-9	Diversity metrics	271.		
		S1-12	Persons with disabilities	117.		
		S1-13	Training and skills development metrics	271.		
		S1-14	Health and safety metrics	117.		
		S1-15	Work-life balance metrics	Not yet reported due to phase-in		
		S1-16	Compensation metrics (pay gap and total compensation)	272.		
		S1-17	Incidents, complaints and severe human rights impacts	272.		
		ESRS S4	Consumers and end users	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	275.
				S4-1	Policies related to consumers and end-users	276.
				S4-2	Processes for engaging with consumers and end-users about impacts	279.
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns			279.		
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions			280.		
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities			283.		
GRI G4: FS13*	Access points in low-populated or economically disadvantaged areas			117.		
GRI 418-1*	Substantiated complaints concerning breaches of customer privacy and losses of customer data			284.		
ESRS G1	Business conduct	ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	286.		
		ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	286.		
		G1-1	Corporate culture and business conduct policies and corporate culture	286.		
		G1-3	Prevention and detection of corruption and bribery	117.		
		GRI 2-27	Compliance with laws and regulations	297.		

\*Entity-specific disclosures

56. List of data points originating from EU legislation	Reference to presentation of disclosures (page number)
ESRS 2 GOV-1 Gender breakdown in the Board of Directors para 21. point d)	89.
ESRS 2 GOV-1 Percentage of independent board members referred to in point (e) of paragraph 21	89.
ESRS 2 GOV-4 Due diligence statement paragraph 30	94.
ESRS 2 SBM-1 Participation in fossil fuel activities Paragraph 40(d)(i)	not relevant
ESRS 2 SBM-1 Participation in activities related to the production of chemicals Paragraph 40(d)(ii)	not relevant
ESRS 2 SBM-1 Participation in activities related to disputed weapons, paragraph 40(d)(iii)	not relevant
ESRS 2 SBM-1 Participation in activities related to tobacco production and production paragraph 40(d)(iv)	not relevant
ESRS E1-1 2050 Climate neutrality transition plan paragraph 14	137.
ESRS E1-1 Firms excluded from EU benchmarks aligned with the Paris Agreement paragraph 16, point (g)	137.
ESRS E1-4 GHG emission reduction target paragraph 34	150.
ESRS E1-5 Use of energy from fossil sources, broken down by source (only sectors with a significant impact on climate) paragraph 38	not relevant
ESRS E1-5 Energy consumption and structure, paragraph 37	not relevant
ESRS E1-5 Energy intensity in relation to activities in sectors with a high climate impact paragraphs 40 to 43	not relevant
ESRS E1-6 Scope 1, 2, 3 gross and total GHG emissions paragraph 44	156.
ESRS E1-6 Gross GHG intensity paragraphs 53 to 55	157.
ESRS E1-7 GHG capture and carbon credits paragraph 56	161.
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	Not yet reported due to phase-in
ESRS E1-9 Amounts of funds broken down into acute and chronic physical risk, paragraph 66(a)	Not yet reported due to phase-in
ESRS E1-9 Location of significant assets exposed to substantial physical risk paragraph 66(c)	Not yet reported due to phase-in
ESRS E1-9. Real estate assets book value breakdown by energy efficiency class paragraph 67(c)	not relevant
ESRS E1-9 Extent of portfolio exposure to climate-related opportunities paragraph 69	69. a) Not yet reported due to phase-in
ESRS E2-4 Emissions to air, water and land of each pollutant listed in Annex II to the European PRTR Regulation European Pollutant Release and Transfer Register, paragraph 28	not relevant
ESRS E3-1 Water and marine resources paragraph 9	not relevant
ESRS E3-1 Dedicated policy, paragraph 13	not relevant
ESRS E3-1 Sustainable oceans and seas paragraph 14	not relevant
SRS E3-4 Total water recycled and reused paragraph 28(c)	not relevant
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	not relevant
ESRS 2 – IRO 1 – E4 Paragraph 16 (a) i	not relevant
ESRS 2 – IRO 1 – E4 Paragraph 16 (b)	not relevant
ESRS 2 – IRO 1 – E4 Paragraph 16 (c)	not relevant
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	166.
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	166.
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	166.
ESRS E5-5 Non-recycled waste paragraph 37 (d)	not relevant
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	not relevant

56. List of data points originating from EU legislation	Reference to presentation of disclosures (page number)
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	258.
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	258.
ESRS S1-1 Human rights policy commitments paragraph 20	259.
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	259.
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	not relevant
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	not relevant
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	263.
ESRS S1-14 Number of fatalities and number and rate of work- related accidents paragraph 88 (b) and (c)	not relevant
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	not relevant
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	272.
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	272.
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	273.
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	not relevant
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	not relevant
ESRS S2-1 Human rights policy commitments paragraph 17	not relevant
ESRS S2-1 Policies related to value chain workers paragraph 18	not relevant
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	not relevant
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	not relevant
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	not relevant
ESRS S3-1 Human rights policy commitments paragraph 16	not relevant
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	not relevant
ESRS S3-4 Human rights issues and incidents paragraph 36	not relevant
ESRS S4-1 Policies related to consumers and end-users paragraph 16	276.
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	277.
ESRS S4-4 Human rights issues and incidents paragraph 35	280.
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	286.
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	not relevant
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	not relevant
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	not relevant

**STATEMENT**

On behalf of OTP Bank Plc. we declare that, to the best of our knowledge, the separate and consolidated financial statements which have been prepared in accordance with the applicable accounting standards, present a true and fair view of the assets, liabilities, financial position and profit and loss of OTP Bank Plc. and its consolidated subsidiaries and associates, and give a fair view of the position, development and performance of OTP Bank Plc. and its consolidated subsidiaries and associates, describing the principal risks and uncertainties, and do not conceal facts or information which are relevant to the evaluation of the Issuer's position.

Moreover, we declare that the Sustainability Report, as part of the Management Report, was prepared in accordance with sustainability reporting standards of the Accounting Act (Act C of 2000 on Accounting), the European Sustainability Reporting Standards (ESRS), and with the provisions of Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council (EU Taxonomy Regulation).

Budapest, 17 March 2026



Dr. Sándor Csányi  
Chairman of the Board of Directors



Péter Csányi  
Chief Executive Officer

**SUPPLEMENTARY DATA**

**FOOTNOTES OF THE TABLE 'CONSOLIDATED PROFIT AFTER TAX BREAKDOWN BY SUBSIDIARIES (IFRS)'**

*General note: regarding OTP Core and other subsidiaries, the adjusted profit after tax is calculated without the effect of adjustment items.*

(1) Aggregated adjusted profit after tax of OTP Core and foreign banks.

(2) OTP Core is an economic unit for measuring the result of core business activity of OTP Group in Hungary. Financials of OTP Core are calculated from the partially consolidated IFRS financial statements of certain companies engaged in OTP Group's operation in Hungary. These companies include OTP Bank Hungary Plc., OTP Mortgage Bank Ltd. Ltd, OTP Building Society Ltd, OTP Factoring Ltd, OTP Financial Point Ltd., OTP Bank Employee Stock Ownership Plan Organization, MONICOMP Ltd., OTP Ingatlanpont Llc., SimplePay Plc., OTP Home Solutions Llc., CIL Babér Ltd., BANK CENTER No. 1. Ltd., OD Ltd., HelloPay Plc. and companies providing intragroup financing.

(3) The result and balance sheet of OTP Leasing EOOD, as well as OTP Factoring Bulgaria EAD until 2Q 2023, and DSK Leasing AD until 4Q 2024 is included.

(4) Including the statement of recognised income and balance sheet of SKB Leasing d.o.o., SKB Leasing Select d.o.o. and OTP factoring d.o.o. In august 2024 the merger of SKB Banka and Nova KBM was completed.

(5) The statement of recognised income and balance sheet of OTP Leasing d.d. was included.

(6) The financial performance of OTP Factoring Serbia d.o.o, OTP Leasing Srbija d.o.o., OTP Osiguranje A.D.O. and OTP Services d.o.o. is included.

(7) Figures are based on the aggregated financial statements of OTP Bank JSC and LLC OTP Leasing, as well as OTP Factoring Ukraine LLC until 3Q 2024.

(8) The statement of recognised income and balance sheet of OTP Debt Collection d.o.o. is included.

(9) The statement of recognised income and balance sheet of LLC MFO "OTP Finance" is included.

(10) In July 2024 the sale of the Romanian bank was financially closed, therefore the Romanian bank contributed to the Group results until June 2024.

(11) The subconsolidated adjusted profit after tax of Merkantil Group (Merkantil Bank Ltd., Merkantil Bérlet Ltd., OTP Real Estate Leasing Ltd., NIMO 2002 Ltd., SPLC-P Ltd., SPLC Ltd.) was presented.

(12) LLC AMC OTP Capital, DSK Asset Management EAD (Bulgaria), OTP Invest a.d. Belgrade (Serbia), OTP Invest d.o.o. (Croatia), and OTP Asset Management SAI S.A. (Romania) until September 2024.

(13) Velvin Ventures Ltd. (Belize), Mendota Invest d.o.o. (Slovenia), R.E. Four d.o.o. and Novi Sad (Serbia), as well as SC Aloha Buzz SRL, SC Favo Consultanta SRL, SC Tezaur Cont SRL (Romania), OTP Solution Fund (Ukraine) until 4Q 2024.

(14) The adjusted profit after tax of the Hungarian operation line includes the adjusted profit after tax of the Hungarian subsidiaries, as well as the eliminations allocated onto these entities.

(15) The adjusted profit after tax of the Foreign operation line includes the adjusted profit after tax of the Foreign subsidiaries, as well as the eliminations allocated onto these entities.

## CALCULATION OF THE ADJUSTED LINES OF IFRS PROFIT AND LOSS STATEMENTS, AS WELL AS THE ADJUSTED BALANCE SHEET LINES PRESENTED IN THE REPORT, AND THE METHODOLOGY FOR CALCULATING THE FX-ADJUSTED BALANCE SHEET AND P&L DYNAMICS

In order to present Group performance reflecting the underlying business trends, the presented consolidated and separate / sub-consolidated profit and loss statements of this report were adjusted, among others, in the following ways, and the adjusted P&Ls are shown and analysed in the Report (unless otherwise stated). Consolidated financial statements together with separate figures of OTP Bank are disclosed in the *Financial Data* section.

### Adjustments affecting the income statement:

- The after tax effect of adjustment items (certain, typically one-off items from banking operations' point of view) are shown and analysed separately in the Statement of Recognised Income. Adjustment items include goodwill impairment and the direct effect of acquisitions (latter includes three items: badwill and initial risk cost related to acquisitions, and the gain or loss on the sale of a subsidiary).
- Performance indicators (such as cost/income ratio, net interest margin, risk cost to average gross loans as well as ROA and ROE ratios, etc.) presented in this report are calculated on the basis of the adjusted profit and loss statement excluding adjustment items (unless otherwise indicated).
- In the *Consolidated financial highlights and share data* table the *Book Value Per Share* and the *Tangible Book Value Per Share*, as well as indicators derived from these are calculated based on the consolidated diluted share count used for EPS calculation.
- Within the report, FX-adjusted statistics for business volume developments and their product breakdown, as well as the FX-adjusted stock of allowances for loan losses are disclosed, too. For FX-adjustment, the closing cross currency rates for the current period were used to calculate the HUF equivalent of loan and deposit volumes in the base periods. Thus, the FX-adjusted volumes for the base periods are different from those published in previous reports. The *FX-adjusted* changes of certain consolidated or sub-consolidated P&L lines in HUF terms may be presented in this Report. According to the applied methodology in the case of the P&L lines, the FX effect is filtered out only in relation to the currency of the given country, irrespective of the transactional currency mix in which the given P&L line materialized. Thus, for instance, as for the consolidated FX-adjusted operating cost development, the effect of the Hungarian Forint rate changes against the given currency is not eliminated in the case of the cost items arising in FX within the Hungarian cost base.

### Adjustments affecting the balance sheet:

- On 9 February 2024 OTP Bank announced the signing of the share sale and purchase agreement to sell its Romanian operation, and the transaction was financially completed on 30 July 2024. As a result of this, according to IFRS 5, starting from the end of 2023 until June 2024, the Romanian operation was presented as an asset classified as held for sale in the consolidated balance sheet, and as discontinued operation in the income statement. With regards to the consolidated balance sheet, from 4Q 2023 all Romanian assets and liabilities were shown on a separate line in the balance sheet. As for the consolidated income statement, in 4Q 2023 for full-year 2023, and in the 2024 actual period the Romanian contribution was shown separately from the result of continuing operation, on the *Net loss / gain from discontinued operation* line, i.e. from 4Q 2023 the particular P&L lines in the 'continuing operations' section of the P&L don't incorporate the contribution from the Romanian subsidiaries. As opposed to this, in the adjusted financial statements presented in the Stock Exchange Report – in line with the structure of the financial statements monitored by the management – until its deconsolidation the Romanian operation was presented in a way as if it was still classified as continuing operation, i.e. its net interest income contribution was presented on the net interest income line in the consolidated adjusted income statement.
- In the adjusted balance sheet, net customer loans include the stock of loans at amortized cost, loans mandatorily at fair value through profit or loss, and finance lease receivables.

**Alternative performance measures  
pursuant to the National Bank of Hungary 5/2017. (V.24.) recommendation<sup>72</sup>**

Alternative performance measures name	Description	Calculation (data in HUF million)	2024	2025
Leverage, consolidated <sup>73</sup>	The leverage ratio is calculated pursuant to Article 429 CRR. The calculation of the indicator is designed quarterly by the Bank for the prudential consolidation circle.	The leverage ratio shall be calculated as an institution's capital measure divided by that institution's total exposure measure and shall be expressed as a percentage. Example for 2025: $\frac{5,253,292.0}{48,687,385.7} = 10.8\%$ Example for 2024: $\frac{4,842,978.2}{46,412,734.7} = 10.4\%$	10.4%	10.8%
Liquidity Coverage Ratio (LCR)	According to Article 412 (1) of CRR, the liquidity coverage ratio (LCR) is designed to promote short-term resilience of the Issuer's / Group's liquidity risk profile and aims to ensure that the Issuer / Group has an adequate stock of unencumbered High Quality Liquid Assets (HQLA) to meet its liquidity needs for a 30 calendar day liquidity stress scenario.	The LCR is expressed as: (stock of HQLA) / (total net cash outflows over the next 30 calendar days) $\geq 100\%$ . The numerator of the LCR is the stock of HQLA (High Quality Liquid Assets). In order to qualify as HQLA, assets should be liquid in markets during a time of stress and, in most cases, be eligible for use in central bank operations. The denominator of the LCR is the total net cash outflows, defined as total expected cash outflows minus total expected cash inflow in the specified stress scenario for the subsequent 30 calendar days. Total cash inflows are subject to an aggregate cap of 75% of total expected cash outflows, thereby ensuring a minimum level of HQLA holdings at all times. Example for 2025: $\frac{11,504,983.9}{7,081,659.0 - 2,498,210.7} = 251.0\%$ Example for 2024: $\frac{12,296,693.9}{6,618,330.9 - 1,987,679.4} = 265.5\%$	265.5%	251.0% <sup>74</sup>
ROE (accounting), consolidated	The return on equity ratio shall be calculated the consolidated accounting profit after tax for the given period divided by the average equity, thus shows the effectiveness of the use of equity.	The numerator of the indicator is the consolidated accounting profit after tax for the given period (annualized for periods less than one year), the denominator is the average consolidated equity. (The definition of average equity: calendar day-weighted average of the average balance sheet items in periods comprising the given period, where periods comprising the given period are defined as quarters (and within that months) in case of 1H, 9M and FY periods, and months in case of quarters. Furthermore, the average of the average balance sheet items is computed as the arithmetic average of closing balance sheet items for the previous period and the current period.) Example for 2025: $\frac{1,146,324.7 * 1.0}{5,296,701.1} = 21.6\%$ Example for 2024: $\frac{1,076,139.4 * 1.0}{4,582,285.5} = 23.5\%$	23.5%	21.6%
ROE (adjusted), consolidated	The return on equity ratio shall be calculated the consolidated adjusted profit after tax for the given period divided by the average equity, thus shows the effectiveness of the use of equity.	The numerator of the indicator is the consolidated adjusted profit after tax for the given period (annualized for periods less than one year), the denominator is the average consolidated equity. Example for 2025: $\frac{1,146,324.7 * 1.0}{5,296,701.1} = 21.6\%$ Example for 2024: $\frac{1,076,139.4 * 1.0}{4,582,285.5} = 23.5\%$	23.5%	21.6%
ROA (adjusted), consolidated	The return on asset ratio shall be calculated the consolidated adjusted net profit for the given period divided by the average total asset, thus shows the effectiveness of the use of equity.	The numerator of the indicator is the consolidated adjusted net profit for the given period, the denominator is the average consolidated total asset. (The definition of average asset: calendar day-weighted average of the average balance sheet items in periods comprising the given period, where periods comprising the given period are defined as quarters (and within that months) in case of 1H, 9M and FY periods, and months in case of quarters. Furthermore, the average of the average balance sheet items is computed as the arithmetic average of closing balance sheet items for the previous period and the current period.) Example for 2025: $\frac{1,146,324.7 * 1.0}{44,762,496.3} = 2.6\%$ Example for 2024: $\frac{1,076,139.4 * 1.0}{41,688,546.3} = 2.6\%$	2.6%	2.6%

<sup>72</sup> The NBH's recommendation (5/2017, 24 May) on Alternative Performance Measures (APM) came into effect from 1 June 2017, in line with ESMA's guidance (ESMA/2015/1415) on the same matter. The recommendation is aimed at – amongst other things – enhancing the transparency, reliability, clarity and comparability of those APMs within the framework of regulated information and thus facilitating the protection of existing and potential investors.

<sup>73</sup> Based on the prudential consolidation scope, which is different from the consolidation scope used in this report.

<sup>74</sup> The Liquidity Coverage Ratio (LCR) presented in this document reflects data as of 31 December 2025. This differs from the 253.0% value disclosed on page 58 of the document titled "Summary of the full-year 2025 results", published on 6 March 2026, as well as on page 317 of the General Meeting Documents published on 26 March 2026. The latter figure relates to the reference date of 31 January 2026.

Alternative performance measures name	Description	Calculation (data in HUF million)	2024	2025
Operating profit margin (adjusted, without one-off items), consolidated	The operating profit margin shall be calculated the consolidated adjusted net operating profit without one-off items for the given period divided by the average total assets, thus shows the effectiveness of the operating profit generation on total assets.	The numerator of the indicator is the consolidated adjusted net operating profit without one-off items for the given period, the denominator is the average consolidated total assets. Example for 2025: $\frac{1,700,172.9 *}{44,762,496.3} \cdot 1.0 = 3.80\%$ Example for 2024: $\frac{1,545,377.0 *}{41,688,546.3} \cdot 1.0 = 3.71\%$	3.71%	3.80%
Total income margin (adjusted, without one-off items), consolidated	The total income margin shall be calculated the consolidated adjusted total income without one-off items for the given period divided by the average total assets, thus shows the effectiveness of income generation on total assets.	The numerator of the indicator is the consolidated adjusted total income without one-off items for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets. Example for 2025: $\frac{2,916,961.8 *}{44,762,496.3} \cdot 1.0 = 6.52\%$ Example for 2024: $\frac{2,633,907.7 *}{41,688,546.3} \cdot 1.0 = 6.32\%$	6.32%	6.52%
Net interest margin (adjusted), consolidated	The net interest margin shall be calculated the consolidated adjusted net interest income for the given period divided by the average total assets, thus shows the effectiveness of net interest income generation on total assets.	The numerator of the indicator is the consolidated adjusted net interest income for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets. Example for 2025: $\frac{1,944,624.7 *}{44,762,496.3} \cdot 1.0 = 4.34\%$ Example for 2024: $\frac{1,782,603.6 *}{41,688,546.3} \cdot 1.0 = 4.28\%$	4.28%	4.34%
Operating cost (adjusted)/ total assets, consolidated	The indicator shows the operational efficiency.	The numerator of the indicator is the consolidated adjusted operating cost for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets. Example for 2025: $\frac{1,216,788.9 *}{44,762,496.3} \cdot 1.0 = 2.72\%$ Example for 2024: $\frac{1,088,530.7 *}{41,688,546.3} \cdot 1.0 = 2.61\%$	2.61%	2.72%
Cost/income ratio (adjusted, without one-off items), consolidated	The indicator is another measure of operational efficiency.	The numerator of the indicator is the consolidated adjusted operating cost for the given period, the denominator is the adjusted operating income (without one-off items) for the given period. Example for 2025: $\frac{1,216,788.9}{2,916,961.8} = 41.7\%$ Example for 2024: $\frac{1,088,530.7}{2,633,907.7} = 41.3\%$	41.3%	41.7%
Provision for impairment on loan and placement losses (adjusted)/ average (adjusted) gross loans, consolidated	The indicator provides information on the amount of impairment on loan and placement losses relative to gross customer loans.	The numerator of the indicator is the consolidated adjusted provision for impairment on loan and placement losses for the given period (annualized for periods less than one year), the denominator is the adjusted consolidated gross customer loans for the given period. (The definition of average (adjusted) gross customer loans: calendar day-weighted average of the average balance sheet items in periods comprising the given period, where periods comprising the given period are defined as quarters (and within that months) in case of 1H, 9M and FY periods, and months in case of quarters. Furthermore, the average of the average balance sheet items is computed as the arithmetic average of closing balance sheet items for the previous period and the current period.) Example for 2025: $\frac{168,787.7 *}{25,506,245.5} \cdot 1.0 = 0.66\%$ Example for 2024: $\frac{89,863.8 *}{23,446,341.1} \cdot 1.0 = 0.38\%$	0.38%	0.66%
Total risk cost (adjusted)/ total asset ratio, consolidated	The indicator shows the amount of total risk cost relative to the balance sheet total.	The numerator of the indicator is consolidated adjusted total risk cost for the given period (annualized for periods less than one year), the denominator is the average consolidated total assets for the given period. Example for 2025: $\frac{197,396.4 *}{44,762,496.3} \cdot 1.0 = 0.44\%$ Example for 2024: $\frac{158,494.4 *}{41,688,546.3} \cdot 1.0 = 0.38\%$	0.38%	0.44%

Alternative performance measures name	Description	Calculation (data in HUF million)	2024	2025
Effective tax rate (adjusted), consolidated	The indicator shows the amount of corporate income tax <sup>75</sup> accounted on pre-tax profit.	The numerator of the indicator is consolidated adjusted corporate income tax <sup>75</sup> for the given period, the denominator is the consolidated adjusted pre-tax profit for the given period. Example for 2025: $\frac{356,451.7}{1,502,776.4} = 23.7\%$ Example for 2024: $\frac{310,743.2}{1,386,882.6} = 22.4\%$	22.4%	23.7%
Net loan/deposit ratio (FX-adjusted), consolidated	The net loan to deposit ratio is the indicator for assessing the bank's liquidity position.	The numerator of the indicator is the consolidated net consumer loan volume (gross loan reduced the amount of provision), the denominator is the end of period consolidated consumer FX-adjusted deposit volume. Example for 2025: $\frac{25,829,350.3}{33,734,266.4} = 77\%$ Example for 2024: $\frac{22,406,859.6}{30,383,499.5} = 74\%$	74%	77%

<sup>75</sup> In addition to corporate income taxes, this line includes special taxes on financial institutions (excluding the Hungarian financial transaction levy), the Hungarian local (municipality) taxes and the innovation contributions, as well as the withholding tax applicable to dividend payments by subsidiaries.

## ADJUSTMENTS ON THE CONSOLIDATED STATEMENT OF PROFIT OR LOSS (IFRS)

	2024 HUF million	2025 HUF million
<b>Net interest income</b>	<b>1,745,341</b>	<b>1,940,571</b>
(-) Reclassification due to the introduction of IFRS16	(3,557)	(4,053)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	33,706	0
<b>Net interest income (adj.)</b>	<b>1,782,604</b>	<b>1,944,625</b>
<b>Net fees and commissions</b>	<b>842,654</b>	<b>1,026,245</b>
(+) Financial Transaction Tax	(123,298)	(163,512)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	3,503	0
(-) Structural shift of income from currency exchange from net fees to the FX result	177,228	258,409
<b>Net fees and commissions (adj.)</b>	<b>545,631</b>	<b>604,324</b>
<b>Foreign exchange result</b>	<b>(12,048)</b>	<b>4,156</b>
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(1,705)	0
(+) Structural shift of income from currency exchange from net fees to the FX result	177,228	258,409
<b>Foreign exchange result (adj.)</b>	<b>163,475</b>	<b>262,565</b>
<b>Gain/loss on securities, net</b>	<b>10,326</b>	<b>22,008</b>
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	5,536	0
(+) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Gain/loss on securities, net)	(9,495)	(1,782)
(+) Shifting of the <i>Gains and losses on non-trading securities mandatorily at fair value through profit or loss</i> line from the <i>Net other non-interest income</i> to the <i>Gains or losses from securities</i> line	6,043	21,953
<b>Gain/loss on securities, net (adj.)</b>	<b>12,410</b>	<b>42,180</b>
<b>Gains and losses on real estate transactions</b>	<b>15,918</b>	<b>7,473</b>
<b>Result of discontinued operation and gains from disposal of subsidiaries classified as held for sale (adjusted)</b>	<b>19,756</b>	<b>0</b>
<b>(+) Other non-interest income</b>	<b>129,280</b>	<b>133,281</b>
<b>(+) Net results on derivative instruments and hedge relationships</b>	<b>12,004</b>	<b>(1,315)</b>
<b>(+) Net insurance result</b>	<b>2,697</b>	<b>3,375</b>
<b>(+) Losses on loans measured mandatorily at fair value through other comprehensive income and on securities at amortized cost</b>	<b>27,373</b>	<b>8,278</b>
<b>(+) Profit from associates</b>	<b>12,970</b>	<b>21,443</b>
(-) Shifting of the <i>Gains and losses on non-trading securities mandatorily at fair value through profit or loss</i> line from the <i>Net other non-interest income</i> to the <i>Gains or losses from securities</i> line	6,043	21,953
(+) Other other non-interest expenses	(72,638)	(83,524)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(8,971)	0
(+) Shifting of the costs of mediated services at Merkantil Bérlét Ltd. to the net other non-interest result line	(2,387)	(2,418)
(+) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Net other non-interest result)	(172)	(246)
(+) Shifting of the depreciation of leased vehicles at Merkantil Bérlét Ltd. to the net other non-interest result line		(1,125)
<b>Net other non-interest result (adj.)</b>	<b>129,788</b>	<b>63,269</b>
<b>Gain from derecognition of financial assets at amortized cost</b>	<b>(14,409)</b>	<b>(699)</b>
(-) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Gain/loss on securities, net)	(9,495)	(1,782)
(-) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Provision for impairment on loan losses)	(4,741)	1,329
(-) Structural adjustment due to the Gain from derecognition of financial assets at amortized cost line (against Net other non-interest result)	(172)	(246)
<b>Gain from derecognition of financial assets at amortized cost (adj.)</b>	<b>0</b>	<b>0</b>
<b>Provision for impairment on loan and placement losses</b>	<b>(72,383)</b>	<b>(155,445)</b>
<b>(+) Modification gains or losses</b>	<b>(13,193)</b>	<b>(9,383)</b>
<b>(+) Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss</b>	<b>5,504</b>	<b>111</b>
<b>(+) Loss allowance on securities at fair value through other comprehensive income and on securities at amortized cost</b>	<b>(39,907)</b>	<b>7,417</b>
<b>(+) Provision for commitments and guarantees given</b>	<b>(2,371)</b>	<b>(6,459)</b>
<b>(+) Impairment of assets subject to operating lease and of investment properties</b>	<b>18</b>	<b>(3,699)</b>
(-) Structural correction between Provision for loan losses and Other provisions	(39,890)	3,718
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(4,714)	0
(+) Structural adjustment due to the <i>Gain from derecognition of financial assets at amortized cost</i> line (against <i>Provision for impairment on loan losses</i> )	(4,741)	1,329
(-) Shifting of provision for impairment on placement losses to the other provisions line	(2,035)	(1,060)
<b>Provision for impairment on loan losses (adj.)</b>	<b>(89,864)</b>	<b>(168,788)</b>

	2024 HUF million	2025 HUF million
<b>Depreciation</b>	<b>(134,293)</b>	<b>(153,127)</b>
<b>(+) Goodwill impairment</b>		<b>(674)</b>
(-) Reclassification due to the introduction of IFRS16	(17,358)	(17,960)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(1,692)	0
(-) Shifting of the depreciation of leased vehicles at Merkantil Bérlet Ltd. to the net other non-interest result line		(1,125)
<b>Depreciation (adj.)</b>	<b>(118,628)</b>	<b>(134,716)</b>
<b>Personnel expenses</b>	<b>(550,175)</b>	<b>(630,275)</b>
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(14,198)	0
<b>Personnel expenses (adj.)</b>	<b>(564,374)</b>	<b>(630,275)</b>
<b>Income taxes</b>	<b>(253,440)</b>	<b>(254,926)</b>
(+) Tax deductible transfers to spectator sports (offset against corporate taxes)	(12,092)	(355)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(2,652)	0
(+) Structural reclassification between Corporate income tax and Other non-interest expenses	(4,159)	(3,667)
(+) Special taxes on financial institutions	(38,400)	(97,504)
<b>Corporate income tax (adj.)</b>	<b>(310,743)</b>	<b>(356,452)</b>
<b>Other operating expense</b>	<b>(127,175)</b>	<b>(152,795)</b>
(-) Other costs and expenses	(10,206)	(11,556)
(-) Other non-interest expenses	(89,334)	(108,394)
(+) Structural correction between <i>Provision for loan losses</i> and <i>Other provisions</i>	(39,890)	3,718
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(186)	0
(+) Shifting of provision for impairment on placement losses to the other provisions line	(2,035)	(1,060)
(-) Shifting of certain expenses arising from mediated services from other provisions to the other non-interest expenses line	(1,115)	(1,578)
<b>Other provisions (adj.)</b>	<b>(68,631)</b>	<b>(28,609)</b>
<b>Other general expenses</b>	<b>(528,308)</b>	<b>(659,238)</b>
(+) Other costs and expenses	(10,206)	(11,556)
(+) Other non-interest expenses	(89,334)	(108,394)
(-) Other other non-interest expenses	(72,638)	(83,524)
(-) Special taxes on financial institutions	(38,400)	(97,504)
(-) Tax deductible transfers to spectator sports (offset against corporate taxes)	(12,092)	(355)
(-) Financial Transaction Tax	(123,298)	(163,512)
(-) Direct effect of acquisitions	0	0
(+) Reclassification due to the introduction of IFRS16	(20,914)	(22,013)
(+) Presentation of the contribution from discontinued operation and assets held for sale on the adjusted P&L lines	(8,627)	0
(-) Shifting of the costs of mediated services at Merkantil Bérlet Ltd. to the net other non-interest result line	(2,387)	(2,418)
(+) Shifting of certain expenses arising from mediated services from other provisions to the other non-interest expenses line	(1,115)	(1,578)
(-) Structural reclassification between Corporate income tax and Other non-interest expenses	(4,159)	(3,667)
<b>Other non-interest expenses (adj.)</b>	<b>(405,529)</b>	<b>(451,798)</b>

## ADJUSTMENTS OF CONSOLIDATED IFRS BALANCE SHEET LINES

	2024 HUF million	2025 HUF million
<b>Cash, amounts due from Banks and balances with the National Banks</b>	6,079,012	4,965,634
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	20	0
<b>Cash, amounts due from Banks and balances with the National Banks (adjusted)</b>	6,079,032	4,965,634
<b>Placements with other banks, net of allowance for placement losses</b>	1,891,901	1,991,490
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	0	0
<b>Placements with other banks, net of allowance for placement losses (adjusted)</b>	1,891,901	1,991,490
<b>Securities at fair value through profit and loss</b>	743,399	425,213
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	704	0
<b>Securities at fair value through profit or loss (adjusted)</b>	744,104	425,213
<b>Securities at fair value through other comprehensive income</b>	1,705,554	2,046,413
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	0	0
<b>Securities at fair value through other comprehensive income (adjusted)</b>	1,705,554	2,046,413
<b>Gross customer loans (incl. finance lease receivables and accrued interest receivables related to loans)</b>	24,334,694	26,863,462
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	0	0
<b>Gross customer loans (adjusted)</b>	24,334,694	26,863,462
<b>Allowances for loan losses (incl. impairment of finance lease receivables)</b>	(973,056)	(1,034,112)
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	0	0
<b>Allowances for loan losses (adjusted)</b>	(973,056)	(1,034,112)
<b>Associates and other investments</b>	124,524	160,418
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	0	0
<b>Associates and other investments (adjusted)</b>	124,524	160,418
<b>Securities at amortized costs</b>	7,447,176	7,925,465
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	565	0
<b>Securities at amortized costs (adjusted)</b>	7,447,741	7,925,465
<b>Tangible and intangible assets, net</b>	985,864	1,033,988
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	22	0
<b>Tangible and intangible assets, net (adjusted)</b>	985,886	1,033,988
<b>Other assets</b>	1,080,060	1,049,173
(+) Allocation of <i>Assets classified as held for sale</i> among balance sheet lines	(1,311)	0
<b>Other assets (adjusted)</b>	1,078,749	1,049,173
<b>Amounts due to banks, the National Governments, deposits from the National Banks and other banks, and Financial liabilities designated at fair value through profit or loss</b>	2,094,681	1,581,260
(+) Allocation of <i>Liabilities directly associated with assets classified as held-for-sale</i> among balance sheet lines	0	0
<b>Amounts due to banks, the National Governments, deposits from the National Banks and other banks, and Financial liabilities designated at fair value through profit or loss (adjusted)</b>	2,094,681	1,581,260
<b>Deposits from customers</b>	31,658,190	33,732,763
(+) <b>Fair value changes of the hedged items in portfolio hedge of interest rate risk</b>	8,209	1,503
(+) Allocation of <i>Liabilities directly associated with assets classified as held-for-sale</i> among balance sheet lines	0	0
<b>Deposits from customers (adjusted)</b>	31,666,399	33,734,266
<b>Other liabilities</b>	1,575,553	1,487,281
(+) Allocation of <i>Liabilities directly associated with assets classified as held-for-sale</i> among balance sheet lines	0	0
<b>Other liabilities (adjusted)</b>	1,575,553	1,487,281

STATEMENT OF PROFIT OR LOSS OF OTP BANK PLC., ACCORDING TO IFRS STANDARDS AS ADOPTED BY THE EUROPEAN UNION (CONSOLIDATED)<sup>76</sup>

	2025 HUF million	2024 HUF million	Change %
<b>CONTINUING OPERATIONS</b>			
Interest income calculated using the effective interest method	2,774,226	2,542,138	9
Income similar to interest income	574,954	539,984	6
Interest incomes	3,349,180	3,082,122	9
Interest expenses	(1,408,608)	(1,336,782)	5
<b>NET INTEREST INCOME</b>	<b>1,940,572</b>	<b>1,745,340</b>	<b>11</b>
<b>Risk cost total</b>	<b>(158,075)</b>	<b>(109,142)</b>	<b>45</b>
Loss allowance / Release of loss allowance on loans, placements, amounts due from banks and repo receivables	(155,445)	(72,385)	115
Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit or loss	111	5,504	
Loss allowance / Release of loss allowance on securities at fair value through other comprehensive income and on securities at amortized cost	7,417	(39,907)	
Provision for commitments and guarantees given	(6,459)	(2,371)	172
Impairment / (Release of impairment) of assets subject to operating lease and of investment properties	(3,699)	17	
<b>NET INTEREST INCOME AFTER RISK COST</b>	<b>1,782,497</b>	<b>1,636,198</b>	<b>9</b>
Income from fees and commissions	1,275,518	1,045,987	22
Expense from fees and commissions	(249,271)	(203,332)	23
<b>Net profit from fees and commissions</b>	<b>1,026,247</b>	<b>842,655</b>	<b>22</b>
<b>Modification gain or loss</b>	<b>(9,383)</b>	<b>(13,193)</b>	<b>(29)</b>
Foreign exchange gains / losses, net	2,840	(44)	
Foreign exchange gains / losses, net	4,156	(12,048)	
Net results on derivative instruments and hedge relationships	(1,316)	12,004	
Gains / Losses on securities, net	22,009	10,326	113
Gains / Losses on financial assets /liabilities measured at fair value through profit or loss	8,278	27,374	(70)
Gain from derecognition of financial assets at amortized cost	(699)	(14,409)	(95)
Profit from associates	21,443	12,970	65
Goodwill impairment	(674)	0	
Other operating income	144,130	147,895	(3)
Gains and losses on real estate transactions	7,473	15,918	(53)
Other non-interest income	133,281	129,280	3
Net insurance result	3,375	2,697	25
Other operating expense	(152,797)	(127,174)	20
<b>Net operating income</b>	<b>44,530</b>	<b>56,938</b>	<b>(22)</b>
Personnel expenses	(630,276)	(550,175)	15
Depreciation and amortization	(153,126)	(134,293)	14
Other administrative expenses	(659,238)	(528,306)	25
<b>Other administrative expenses</b>	<b>(1,442,640)</b>	<b>(1,212,774)</b>	<b>19</b>
<b>PROFIT BEFORE INCOME TAX</b>	<b>1,401,251</b>	<b>1,309,824</b>	<b>7</b>
Income tax expense	(254,926)	(253,440)	1
<b>PROFIT AFTER INCOME TAX FOR THE PERIOD FROM CONTINUING OPERATIONS</b>	<b>1,146,325</b>	<b>1,056,384</b>	<b>9</b>
<b>DISCONTINUED OPERATIONS</b>			
<b>Net loss / gain from discontinued operation</b>	<b>0</b>	<b>19,756</b>	
<b>PROFIT AFTER INCOME TAX FROM CONTINUING AND DISCONTINUED OPERATION</b>	<b>1,146,325</b>	<b>1,076,140</b>	<b>7</b>
From this, attributable to:			
Non-controlling interest	5,627	4,227	33
Owners of the company	1,140,698	1,071,913	6

<sup>76</sup> The rows of the table are based on audited numbers, but the structure of the table can differ from the IFRS financial statements presented in the Annual Report (certain rows might be merged or represent different level of aggregation).

STATEMENT OF FINANCIAL POSITION OF OTP BANK PLC., ACCORDING TO IFRS STANDARDS AS ADOPTED BY THE EUROPEAN UNION (CONSOLIDATED)<sup>77</sup>

	2025 HUF million	2024 HUF million	Change %
Cash, amounts due from banks and balances with the National Banks	4,965,635	6,079,012	(18)
Placements with other banks	1,991,489	1,891,901	5
Repo receivables	237,144	331,837	(29)
Financial assets at fair value through profit or loss	425,213	743,400	(43)
Securities at fair value through other comprehensive income	2,046,414	1,705,553	20
Securities at amortized cost	7,925,465	7,447,177	6
Loans at amortized cost	22,299,578	20,290,381	10
Loans mandatorily at fair value through profit or loss	1,941,222	1,559,781	24
Finance lease receivables	1,588,550	1,511,477	5
Associates and other investments	160,418	124,523	29
Property and equipment	601,071	581,240	3
Intangible assets and goodwill	385,796	356,564	8
Right-of-use assets	81,587	79,830	2
Investment properties	92,977	88,240	5
Derivative financial assets designated as hedge accounting	29,625	50,381	(41)
Deferred tax assets	76,274	56,583	35
Current income tax receivable	31,296	7,060	343
Other assets	547,390	514,188	6
<b>TOTAL ASSETS</b>	<b>45,427,144</b>	<b>43,419,128</b>	<b>5</b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks	1,490,921	2,022,191	(26)
Repo liabilities	166,809	132,137	26
Financial liabilities designated at fair value through profit or loss	90,340	72,490	25
Deposits from customers	33,732,764	31,658,189	7
Fair value changes of the hedged items in portfolio hedge of interest rate risk	1,503	8,209	(82)
Liabilities from issued securities	2,512,635	2,593,124	(3)
Derivative financial liabilities held for trading	81,265	114,089	(29)
Derivative financial liabilities designated as hedge accounting	11,501	14,605	(21)
Leasing liabilities	82,401	82,109	0
Deferred tax liabilities	28,347	32,637	(13)
Current income tax payable	35,641	76,787	(54)
Provisions	151,123	131,637	15
Other liabilities	930,194	991,552	(6)
Subordinated bonds and loans	486,084	369,359	32
Liabilities directly associated with assets classified as held for sale	0	0	
<b>TOTAL LIABILITIES</b>	<b>39,801,528</b>	<b>38,299,115</b>	<b>4</b>
Share capital	28,000	28,000	0
Retained earnings and reserves	6,040,575	5,327,652	13
Treasury shares	(458,637)	(245,319)	87
Total equity attributable to the parent	5,609,938	5,110,333	10
Total equity attributable to non-controlling interest	15,678	9,680	62
<b>TOTAL SHAREHOLDERS' EQUITY</b>	<b>5,625,616</b>	<b>5,120,013</b>	<b>10</b>
<b>TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY</b>	<b>45,427,144</b>	<b>43,419,128</b>	<b>5</b>

<sup>77</sup> The rows of the table are based on audited numbers, but the structure of the table can differ from the IFRS financial statements presented in the Annual Report (certain rows might be merged or represent different level of aggregation)

## SECURITY LISTED ON THE BUDAPEST STOCK EXCHANGE BETWEEN 01/01/2015 AND 31/12/2025

Issuer	Type of security	Security name	Date of issue	Date of maturity	Ccy
OTP Bank Plc.	Retail bond	OTP EURO 1 2015/XXVI	09/01/2015	23/01/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/I	30/01/2015	13/02/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/II	20/02/2015	06/03/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/III	20/03/2015	03/04/2016	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 2 2017/I	10/04/2015	10/04/2017	USD
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/IV	10/04/2015	24/04/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/V	24/04/2015	08/05/2016	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 1 2016/VI	24/04/2015	24/04/2016	USD
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/VII	29/05/2015	12/06/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/VIII	30/06/2015	14/07/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/IX	24/07/2015	07/08/2016	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 1 2016/X	24/07/2015	24/07/2016	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2016/XI	25/09/2015	25/09/2016	USD
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/XII	25/09/2015	09/10/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/XIII	30/10/2015	13/11/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/XIV	11/11/2015	25/11/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/XV	27/11/2015	11/12/2016	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2016/XVI	30/12/2015	13/01/2017	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 1 2017/I	29/01/2016	29/01/2017	USD
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/II	29/01/2016	12/02/2017	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/III	12/02/2016	26/02/2017	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/IV	26/02/2016	12/03/2017	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 1 2017/V	18/03/2016	18/03/2017	USD
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/VI	18/03/2016	01/04/2017	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/VII	15/04/2016	29/04/2017	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 1 2017/VIII	27/05/2016	27/05/2017	USD
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/IX	27/05/2016	10/06/2017	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/X	10/06/2016	24/06/2017	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/XI	01/07/2016	15/07/2017	EUR
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/XII	10/08/2016	24/08/2017	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 1 2017/XIII	16/09/2016	16/09/2017	USD
OTP Bank Plc.	Retail bond	OTP EURO 1 2017/XIV	16/09/2016	30/09/2017	EUR
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/I	20/01/2017	20/01/2018	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2021/I	15/02/2017	27/10/2021	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2020/III	23/02/2017	20/05/2020	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2022/I	24/02/2017	24/05/2022	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/II	03/03/2017	03/03/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/III	13/04/2017	13/04/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/IV	02/06/2017	02/06/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/V	14/07/2017	14/07/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/VI	04/08/2017	04/08/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/VII	29/09/2017	29/09/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/VIII	17/11/2017	17/11/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2018/IX	20/12/2017	20/12/2018	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/I	16/02/2018	16/02/2019	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/II	29/03/2018	29/03/2019	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2023/I	05/04/2018	24/11/2023	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/III	18/05/2018	18/05/2019	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/IV	28/06/2018	28/06/2019	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/V	06/08/2018	06/08/2019	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/A	17/09/2018	20/05/2024	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/B	18/09/2018	24/05/2024	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/VI	04/10/2018	04/10/2019	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/II	10/10/2018	24/10/2024	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/VII	15/11/2018	15/11/2019	USD
OTP Bank Plc.	Corporate bond	OTP DK HUF 2019/II	15/12/2018	31/05/2019	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2020/I	15/12/2018	31/05/2020	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2021/I	15/12/2018	31/05/2021	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2022/I	15/12/2018	31/05/2022	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2023/I	15/12/2018	31/05/2023	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2019/VIII	20/12/2018	20/12/2019	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/I	21/02/2019	21/02/2020	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/II	04/04/2019	04/04/2020	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/III	16/05/2019	16/05/2020	USD
OTP Bank Plc.	Corporate bond	OTP DK HUF 2024/I	30/05/2019	31/05/2024	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2025/I	30/05/2019	31/05/2025	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/IV	27/06/2019	27/06/2020	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/V	15/08/2019	15/08/2020	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/VI	26/09/2019	26/09/2020	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/VII	07/11/2019	07/11/2020	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2020/VIII	19/12/2019	19/12/2020	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2025/II	03/02/2020	26/11/2025	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2021/I	20/02/2020	20/02/2021	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2024/C	24/02/2020	24/10/2024	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2021/II	02/04/2020	02/04/2021	USD
OTP Bank Plc.	Retail bond	OTP VK USD 1 2021/III	14/05/2020	14/05/2021	USD
OTP Bank Plc.	Corporate bond	OTP DK HUF 2022/II	29/05/2020	31/05/2022	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2023/II	29/05/2020	31/05/2023	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2024/II	29/05/2020	31/05/2024	HUF

Issuer	Type of security	Security name	Date of issue	Date of maturity	Ccy
OTP Bank Plc.	Corporate bond	OTP DK HUF 2025/II	29/05/2020	31/05/2025	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2026/I	29/05/2020	31/05/2026	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2027/I	29/05/2020	31/05/2027	HUF
OTP Bank Plc.	Retail bond	OTP VK USD 1 2021/IV	18/06/2020	18/06/2021	USD
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2027/I	23/07/2020	27/10/2027	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2025/III	31/05/2021	31/05/2025	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2024/III	31/05/2021	31/05/2024	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2027/II	31/05/2021	31/05/2027	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2026/II	31/05/2021	31/05/2026	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2028/I	31/05/2021	31/05/2028	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2029/I	31/05/2021	31/05/2029	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2030/I	31/05/2021	31/05/2030	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2031/I	18/08/2021	22/10/2031	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2026/III	31/03/2022	31/05/2026	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2027/III	31/03/2022	31/05/2027	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2028/II	31/03/2022	31/05/2028	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2029/II	31/03/2022	31/05/2029	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2030/II	31/03/2022	31/05/2030	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2031/I	31/03/2022	31/05/2031	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2032/I	31/03/2022	31/05/2032	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2029/A	25/07/2022	24/05/2029	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/1	18/11/2022	18/11/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/1	22/12/2022	05/01/2026	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/1	17/02/2023	17/02/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/2	10/03/2023	10/03/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/3	31/03/2023	31/03/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/4	21/04/2023	21/04/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/5	12/05/2023	12/05/2024	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2028/III	01/06/2023	31/05/2028	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2029/III	01/06/2023	31/05/2029	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2030/III	01/06/2023	31/05/2030	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2031/III	01/06/2023	31/05/2031	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2032/II	01/06/2023	31/05/2032	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2033/I	01/06/2023	31/05/2033	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/6	02/06/2023	02/06/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/7	23/06/2023	23/06/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/8	30/06/2023	30/06/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/2	30/06/2023	30/06/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/9	28/07/2023	28/07/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/10	07/08/2023	07/08/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/11	01/09/2023	01/09/2024	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2032/A	20/09/2023	24/11/2032	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/12	25/09/2023	25/09/2024	HUF
OTP Bank Plc.	Retail bond	OTP TBSZ HUF 2028/1	13/10/2023	15/12/2028	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/13	20/10/2023	20/10/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/14	17/11/2023	17/11/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/2	15/12/2023	15/12/2026	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2024/15	20/12/2023	20/12/2024	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/3	12/01/2024	12/01/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/4	02/02/2024	02/02/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/5	01/03/2024	01/03/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/6	28/03/2024	28/03/2025	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2029/B	10/04/2024	20/06/2029	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/7	26/04/2024	26/04/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/8	24/05/2024	24/05/2025	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2029/IV	31/05/2024	31/05/2029	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2030/IV	31/05/2024	31/05/2030	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2031/III	31/05/2024	31/05/2031	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2032/III	31/05/2024	31/05/2032	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2033/II	31/05/2024	31/05/2033	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2034/I	31/05/2024	31/05/2034	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/9	07/06/2024	07/06/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/10	05/07/2024	05/07/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/11	02/08/2024	02/08/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/12	30/08/2024	30/08/2025	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	OJB2029/I	16/09/2024	31/10/2029	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/13	27/09/2024	27/09/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/14	31/10/2024	31/10/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/15	29/11/2024	29/11/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2025/16	18/12/2024	18/12/2025	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/3	17/01/2025	17/01/2026	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/4	31/01/2025	31/01/2026	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/5	14/02/2025	14/02/2026	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/6	14/03/2025	14/03/2026	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/7	11/04/2025	11/04/2026	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/8	09/05/2025	09/05/2026	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2030/V	30/05/2025	31/05/2030	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2031/IV	30/05/2025	31/05/2031	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2032/IV	30/05/2025	31/05/2032	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2033/III	30/05/2025	31/05/2033	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2034/II	30/05/2025	31/05/2034	HUF
OTP Bank Plc.	Corporate bond	OTP DK HUF 2035/I	30/05/2025	31/05/2035	HUF
OTP Bank Plc.	Retail bond	OTP HUF 2026/9	06/06/2025	06/06/2026	HUF

Issuer	Type of security	Security name	Date of issue	Date of maturity	Ccy
OTP Bank Plc.	Retail bond	OTP_HUF_2026/10	27/06/2025	27/06/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/11	16/07/2025	16/07/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/12	15/08/2025	15/08/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/13	12/09/2025	12/09/2026	HUF
OTP Mortgage Bank Ltd.	Mortgage bond	QJB2032/B	22/09/2025	20/12/2032	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/14	10/10/2025	10/10/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/15	31/10/2025	31/10/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/16	21/11/2025	21/11/2026	HUF
OTP Bank Plc.	Retail bond	OTP_HUF_2026/17	12/12/2025	12/12/2026	HUF

**COMPANIES INVOLVED IN THE SCOPE OF CONSOLIDATION**  
**(in IFRS consolidated accounts)**

Name of the company	Country		Initial capital/Equity (in LCY)	Ownership Directly + indirectly (%)	Voting rights (%)	Classification <sup>1</sup>
1 OTP Real Estate Ltd.	Hungary	HUF	1,101,000,000	100.00	100.00	L
2 BANK CENTER No. 1. Ltd.	Hungary	HUF	11,500,000,000	100.00	100.00	L
3 OTP Fund Management Ltd.	Hungary	HUF	900,000,000	100.00	100.00	L
4 OTP Factoring Ltd.	Hungary	HUF	500,000,000	100.00	100.00	L
5 OTP Close Building Society	Hungary	HUF	2,000,000,000	100.00	100.00	L
6 Merkantil Bank Ltd.	Hungary	HUF	3,000,000,000	100.00	100.00	L
7 BANK CENTER No. Kettő Beruházási és Fejlesztési Kft.	Hungary	HUF	3,200,000	100.00	100.00	L
8 Merkantil Bérlet Ltd.	Hungary	HUF	6,000,000	100.00	100.00	L
9 OTP Mortgage Bank Ltd. Ltd.	Hungary	HUF	82,000,000,000	100.00	100.00	L
10 OTP Funds Servicing and Consulting Company Limited	Hungary	HUF	2,351,000,000	100.00	100.00	L
11 DSK Bank AD	Bulgaria	BGN	1,328,659,920	99.92	99.92	L
12 POK DSK-Rodina AD	Bulgaria	BGN	10,010,198	99.85	99.85	L
13 NIMO 2002 Ltd.	Hungary	HUF	1,156,000,000	100.00	100.00	L
14 OTP Real Estate Investment Fund Management Ltd.	Hungary	HUF	100,000,000	100.00	100.00	L
15 DSK Asset Management EAD	Bulgaria	BGN	1,000,000	100.00	100.00	L
16 OTP banka dioničko društvo	Croatia	EUR	539,156,898	100.00	100.00	L
17 Air-Invest Ltd.	Hungary	HUF	700,000,000	100.00	100.00	L
18 OTP Invest društvo s ograničenom odgovornošću za upravljanje fondovima	Croatia	EUR	2,417,030	100.00	100.00	L
19 OTP Nekretnine d.o.o.	Croatia	EUR	39,635,100	100.00	100.00	L
20 SPLC-P Ltd.	Hungary	HUF	15,000,000	100.00	100.00	L
21 SPLC Ltd.	Hungary	HUF	10,000,000	100.00	100.00	L
22 OTP Real Estate Leasing Ltd.	Hungary	HUF	214,000,000	100.00	100.00	L
23 OTP Life Annuity Real Estate Investment Plc.	Hungary	HUF	1,229,300,000	100.00	100.00	L
24 OTP Leasing d.d.	Croatia	EUR	1,067,560	100.00	100.00	L
25 Joint-Stock Company OTP Bank	Ukraine	UAH	6,186,023,111	100.00	100.00	L
26 JSC "OTP Bank" (Russia)	Russia	RUB	2,797,887,853	97.92	97.92	L
27 Montenegrin Commercial Bank Shareholding Company, Podgorica Montenegro	Montenegro	EUR	181,875,221	100.00	100.00	L
28 OTP banka Srbija, joint-stock company, Novi Sad)	Serbia	RSD	56,830,752,260	100.00	100.00	L
29 OTP Nekretnine doo Novi Sad	Serbia	RSD	203,783,061	100.00	100.00	L
30 OTP Ingatlanpont Ltd.	Hungary	HUF	8,500,000	100.00	100.00	L
31 OTP Hungaro-Projekt Ltd.	Hungary	HUF	27,720,000	100.00	100.00	L
32 OTP Mérnöki Ltd.	Hungary	HUF	3,000,000	100.00	100.00	L
33 LLC AMC OTP Capital	Ukraine	UAH	10,000,000	100.00	100.00	L
34 CRESCO d.o.o.	Croatia	EUR	5,170	100.00	100.00	L
35 LLC OTP Leasing	Ukraine	UAH	45,495,340	100.00	100.00	L
36 OTP Financing Solutions	The Netherlands	EUR	18,000	100.00	100.00	L
37 Velvin Ventures Ltd.	Belize	USD	50,000	100.00	100.00	L
38 OTP Insurance Broker EOOD	Bulgaria	BGN	5,000	100.00	100.00	L
39 Portfolion Venture Capital Fund Management Ltd.	Hungary	HUF	59,050,000	66.98	66.98	L
40 OTP Holding Ltd.	Cyprus	EUR	131,000	100.00	100.00	L
41 OTP Debt Collection d.o.o. Podgorica	Montenegro	EUR	49,000,001	100.00	100.00	L
42 OTP Factoring Serbia d.o.o.	Serbia	RSD	782,902,282	100.00	100.00	L
43 MONICOMP Ltd.	Hungary	HUF	320,500,000	100.00	100.00	L
44 CIL Babér Ltd.	Hungary	HUF	71,890,330	100.00	100.00	L
45 Project 01 Consulting, s. r. o.	Slovakia	EUR	22,540,000	100.00	100.00	L
46 R.E. Four d.o.o., Novi Sad	Serbia	RSD	1,983,643,761	100.00	100.00	L
47 OTP Financial point Ltd.	Hungary	HUF	54,000,000	100.00	100.00	L
48 SimplePay Plc.	Hungary	HUF	1,400,000,000	100.00	100.00	L
49 OTP Holding Malta Ltd.	Malta	EUR	104,950,000	100.00	100.00	L
50 OTP Financing Malta Ltd.	Malta	EUR	105,000,000	100.00	100.00	L
51 LLC MFO "OTP Finance"	Russia	RUB	6,533,000,000	100.00	100.00	L
52 OTP Travel Limited	Hungary	HUF	27,000,000	100.00	100.00	L
53 OTP Ecosystem Limited Liability Company; OTP Ecosystem Llc.	Hungary	HUF	281,500,000	100.00	100.00	L
54 DSK ventures EAD	Bulgaria	BGN	250,000	100.00	100.00	L
55 OTP Bank ESOP	Hungary	HUF	183,874,614,179	0.00	0.00	L
56 Portfolion Digital Ltd.	Hungary	HUF	101,000,000	100.00	100.00	L
57 OTP Ingatlankezelő Ltd.	Hungary	HUF	50,000,000	100.00	100.00	L
58 OTP Services Ltd.	Serbia	RSD	40,028	100.00	100.00	L
59 Club Hotel Füred Szálloda Ltd.	Hungary	HUF	90,000,000	100.00	100.00	L
60 DSK DOM EAD	Bulgaria	BGN	100,000	100.00	100.00	L
61 ShiwaForce.com Inc.	Hungary	HUF	114,107,000	84.92	84.92	L
62 OTP Leasing EOOD	Bulgaria	BGN	4,100,000	100.00	100.00	L
63 Regional Urban Development Fund AD	Bulgaria	BGN	250,000	52.00	52.00	L
64 Banka OTP Albania SHA	Albania	ALL	6,740,900,000	100.00	100.00	L
65 OTP Leasing Srbija d.o.o. Beograd	Serbia	RSD	426,968,290	100.00	100.00	L
66 OTP Osiguranje AKCIONARSKO DRUŠTVO ZA	Serbia	RSD	537,606,648	100.00	100.00	L
67 OTP Bank S.A.	Moldavia	MDL	100,000,000	98.26	98.26	L

Name of the company	Country		Initial capital/Equity (in LCY)	Ownership Directly + indirectly (%)	Voting rights (%)	Classification <sup>1</sup>
68 SKB Leasing d.o.o.	Slovenia	EUR	16,809,031	100.00	100.00	L
69 SKB Leasing Select d.o.o.	Slovenia	EUR	5,000,000	100.00	100.00	L
70 OTP Home Solutions Limited Liability Company	Hungary	HUF	30,000,000	100.00	100.00	L
71 OTP banka d.d.	Slovenia	EUR	150,000,000	100.00	100.00	L
72 OTP factoring d.o.o.	Slovenia	EUR	500,000	100.00	100.00	L
73 OTP Luxembourg S.à r.l.	Luxembourg	EUR	2,711,440	100.00	100.00	L
74 Foglajorvost Online Ltd	Hungary	HUF	7,202,400	100.00	100.00	L
75 Mendota Invest, Nepremicninska druzba, d.o.o.	Slovenia	EUR	257,500	100.00	100.00	L
76 OD Ltd.	Hungary	HUF	6,000,000	60.00	60.00	L
77 JN Parkoló Ltd.	Hungary	HUF	11,000,000	100.00	100.00	L
78 JSCMB "IPOTEKA BANK"	Uzbekistan	UZS	3,834,217,638,941	79.83	98.99	L
79 OTP INVEST DRUŠTVO ZA UPRAVLJANJE UCITS I ALTERNATIVNIM FONDOVIMA AD BEOGRAD	Serbia	RSD	411,432,000	100.00	100.00	L
80 Hello Pay IT and Service cPlc.	Hungary	HUF	5,000,000	100.00	100.00	L
81 LLC OTP Financial Technologies	Russia	RUB	10,000	100.00	100.00	L
82 Portfolion Munkavállalói Rész tulajdonosi Program Szervezet	Hungary	HUF	2,030,000,000	0.00	0.00	L
83 Balanz Real Estate Institute Fund	Hungary	HUF	45,812,856,452	100.00	100.00	L
84 Portfolion Zöld Fund	Hungary	HUF	37,500,000,000	100.00	100.00	L
85 Portfolion Digitális Magántőkealap I.	Hungary	HUF	7,000,000,000	100.00	100.00	L
86 Portfolion Regionális Fund II.	Hungary	HUF	25,060,000,000	49.88	49.88	L
87 Portfolion Partner Fund	Hungary	HUF	72,004,608,295	30.56	30.56	L
88 Portfolion Digitális Magántőkealap II.	Hungary	HUF	14,000,000,000	100.00	100.00	L
89 Portfolion Agrár Magántőkealap II.	Hungary	HUF	40,000,000,000	100.00	100.00	L
90 "Nemesszalóki Mezőgazdasági" Állattenyésztési, Növénytermesztési, Termelő és Szolgáltató Plc.	Hungary	HUF	924,124,000	100.00	100.00	L
91 ZA-Invest Béta Ltd.	Hungary	HUF	8,000,000	100.00	100.00	L
92 NAGISZ Plc.	Hungary	HUF	3,802,080,000	100.00	100.00	L
93 Nádudvari Élelmiszer Feldolgozó és Kereskedelmi Ltd.	Hungary	HUF	1,954,680,000	99.97	99.97	L
94 HAGE Ltd.	Hungary	HUF	2,689,000,000	99.61	99.61	L
95 AFP Private Equity Invest Plc.	Hungary	EUR	452,000	29.14	29.14	L
96 ZA-Invest Delta Ltd.	Hungary	HUF	4,000,000	100.00	100.00	L
97 ZA-Invest Kappa Ltd.	Hungary	HUF	11,000,000	100.00	100.00	L
98 ZA Invest Gamma Ltd.	Hungary	HUF	3,100,000	100.00	100.00	L
99 ZA Gamma HoldCo Ltd.	Hungary	HUF	3,100,000	100.00	100.00	L
100 Aranykalász 1955. Ltd.	Hungary	HUF	55,560,000	75.00	100.00	L
101 AGROMAG-PLUSZ Ltd.	Hungary	HUF	39,110,000	74.99	100.00	L
102 ARANYMEZŐ 2001. Ltd.	Hungary	HUF	3,000,000	75.00	100.00	L
103 Agricultural Privatey Held Joint-Stock Company Szekszárd	Hungary	HUF	862,000,000	100.00	100.00	L
104 Szajk Agricultural Closed Company Limited by shares	Hungary	HUF	659,859,000	100.00	100.00	L
105 ZA-Invest Poultry Korlátolt Felelősségű Társaság	Hungary	HUF	8,000,000	50.10	50.10	L
106 "YASHIL FERMA" Joint Venture Limited Liability Company	Uzbekistan	UZS	277,042,231,632	66.67	66.67	L
107 ZA-Invest Lambda Korlátolt Felelősségű Társaság	Hungary	HUF	4,950,000	100.00	100.00	L
108 ZA Lambda Holdco Korlátolt Felelősségű Társaság	Hungary	HUF	4,000,000	100.00	100.00	L
109 BAKONYI AGRÁR Mezőgazdasági, Vagyonkezelő és Szolgáltató Kft	Hungary	HUF	480,000,000	98.71	98.71	L
110 AGRO-MILCH Mezőgazdasági és Szolgáltató Kft.	Hungary	HUF	69,060,000	99.42	99.42	L
111 BOSFLÖR Mezőgazdasági és Szolgáltató Kft.	Hungary	HUF	80,420,000	97.81	97.81	L

<sup>1</sup> Full consolidated - L

## INDEPENDENT AUDITOR'S REPORT 2025



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## This is a translation of the Hungarian Report

### Independent Auditors' Report

To the Shareholders of OTP Bank Nyrt.

#### Report on the audit of the separate financial statements

#### Opinion

We have audited the accompanying 2025 separate financial statements of OTP Bank Nyrt. ("the Company") included in the accompanying 529900W3MO000A18X956-2025-12-31-1-hu.zip<sup>1</sup> digital file, which comprise the separate statement of financial position as at 31 December 2025 - showing a total assets of HUF 19,001,373 million -, and a separate statement of comprehensive income - showing a total comprehensive income for the year of HUF 664,738 million -, the related separate statement of profit or loss, separate statement of changes in equity, separate statement of cash-flows for the year then ended and notes to the separate financial statements, including material accounting policy information.

In our opinion the separate financial statements give a true and fair view of the financial position of the Company as at 31 December 2025 and of its financial performance and its cash flows for the financial year then ended in accordance with International Financial Reporting Standards as adopted by the EU ("EU IFRSs") and have been prepared, in all material respects, in accordance with the supplementary requirements of Act C of 2000 on Accounting ("Hungarian Accounting Law") relevant for separate financial statements prepared in accordance with EU IFRSs.

#### Basis for opinion

We conducted our audit in accordance with Hungarian National Auditing Standards and with applicable laws and regulations in Hungary, including also Regulation (EU) No. 537/2014 of the European Parliament and of the Council of 16 April 2014 on specific requirements regarding statutory audit of public-interest entities ("Regulation (EU) No. 537/2014"). Our responsibilities under those standards are further described in the "Auditor's responsibilities for the audit of the separate financial statements" section of our report.

We are independent of the Company in accordance with the applicable ethical requirements according to relevant laws in effect in Hungary and the policy of the Chamber of Hungarian Auditors on the ethical rules and disciplinary proceedings and with the International Ethics Standards Board of Accountants' (IESBA) International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) as applicable to audits of financial statements of public interest entities, and we have fulfilled our other ethical responsibilities relevant to audits of the financial statements of public interest entities in accordance with these requirements.

<sup>1</sup> Digital identification of the above referred digital file, using SHA 256 HASH algorithm is E78D815B8BCCA95E3D1F5E6DC40DA5647AFEB64DE088489E1F746457B99A9AF2



We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the separate financial statements of the current period. These matters were addressed in the context of our audit of the separate financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For each matter below, our description of how our audit addressed the matter is provided in that context.

We have fulfilled the responsibilities described in the “Auditor’s responsibilities for the audit of the separate financial statements” section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the separate financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying separate financial statements.

#### Determination of loss allowance on loans at amortised cost and provision according to IFRS9 (referred together as “expected credit losses” or “ECL”)

Credit impairment is a highly subjective area due to the level of judgement applied by management in determining ECL. The identification of expected credit losses and the determination of the recoverable amount are inherently uncertain processes involving various assumptions and factors. Such factors may include the financial condition of the counterparty, expected future cash flows, and expected net selling prices of collateral. The portfolios which give rise to the greatest uncertainty are typically those where expected credit loss is derived from estimates of future cash flows and the realisable value of collateral, calculated using collective ECL models, which are unsecured or are subject to potential collateral shortfalls. These models require the significant periodic judgment of management regarding correct segmentation, the identification of significant changes in credit risk, the inclusion of forward-looking elements as well as the application of management overlay (to

We involved valuation specialists to assist us in performing our audit procedures on ECL. Our audit procedures included among others the following procedures.

We evaluated the design and tested the operating effectiveness of internal controls over the approval, recording and monitoring of loans at amortized cost and controls over ECL calculations, including the quality of underlying data and applications.

We evaluated the controls over the general IT environment of the applications relevant from an audit perspective related to the determination of ECL.

For ECL calculated on an individual basis, we tested the assumptions used by the management underlying the expected credit loss identification and quantification focusing on borrowers with the most significant potential impact on the separate financial statements. We also evaluated management’s assumptions on the expected future cash flows, including

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reflect on circumstances beyond the modelling capabilities).

Given the economic uncertainties arising from the Russian - Ukrainian conflict and the risks to the global economy, significant judgement is required in the assessment of significant changes in credit risk, the definition of default, the estimation of future cash-flows (including the value of realisable collateral) and the evaluation of forward-looking information.

Due to the significance of loans at amortised cost (representing 25% of Total Assets as of 31 December 2025) and the ECL related estimation uncertainty, this is considered a key audit matter.

the value of realisable collateral and estimates of recovery based on our own understanding and available market information.

We evaluated management's assumptions relating to the overall uncertainties arising from the geopolitical and economic situation caused by the Russian-Ukrainian conflict.

For ECL calculated on a collective basis we evaluated the model governance, methodologies, inputs and management assumptions used (probability of default, loss given default, significant increase in credit risk and forward-looking elements).

We considered the regulatory measures on the assumptions applied by the management for ECL estimation purposes.

We also evaluated whether the disclosures in the separate financial statements appropriately reflect the Company's exposure to credit risk and are compliant with the EU IFRSs.

The Company's disclosures about its risk management policies are included in Note 2.6 Loss allowance and 36.1 Credit risk which specifically explains the key assumptions used when determining credit risk and their evaluation are detailed in Note 11 Loans and Note 30 Risk cost.

#### General Information Technology controls over the financial reporting process

A significant part of the Company's financial reporting process, including revenue recognition, is significantly reliant on IT systems with embedded automated processes and controls over the capture, storage and extraction of information. A fundamental component of these processes and controls is ensuring appropriate user access and change management protocols exist and are being adhered to.

We focused our audit on those IT systems and controls that are significant for the Company's financial reporting. As audit procedures over the IT systems and application controls require specific expertise, we involved IT audit specialists to assist us in performing our audit procedures. Our audit procedures included among others the following procedures.



These protocols are important because they ensure that access and changes to IT systems and related data are made and authorized in an appropriate manner.

As our audit of the standalone financial statements sought to place a high level of reliance on IT systems and application controls related to financial reporting, a high proportion of the overall audit effort has been carried out regarding to understand and test IT infrastructure and applications including relevant application controls. Furthermore, the complexity of IT systems and nature of application controls requires special technology expertise and specialized skills to be involved in the audit we therefore consider this as a key audit matter.

We understood and assessed the overall IT control environment and the controls in place which included controls over access to systems and data, as well as system changes. We adjusted our audit approach based on the financial significance of the system and whether there were automated procedures supported by that system.

As part of our audit procedures we tested the operating effectiveness of controls over appropriate access rights to assess whether only appropriate users had the ability to create, modify or delete user accounts for the relevant in-scope applications. We also tested the operating effectiveness of controls around system development and program changes to establish that changes to the system were appropriately authorized, developed and implemented. Additionally, we assessed and tested the design and operating effectiveness of the application controls embedded in the processes relevant to our audit.

The Company's disclosures about its IT systems and related IT general and application controls are included in section System of internal controls and IT Controls of the Management report.

Estimation uncertainties as a result of the Russian - Ukrainian conflict (excluding expected credit losses relating to loans at amortised cost)

On 24 February 2022, the Russian army started military operations in Ukraine, which are still ongoing at the date of our audit report.

In connection to this, there have been, among others, impacts on businesses in Ukraine and Russia. The sanctions implemented caused an unforeseen rise and volatility of market prices, foreign exchange and interest rates. It is

We involved valuation specialists to assist us in performing our audit procedures, which included among others the following procedures.

We evaluated the appropriateness of the Company's controls over the valuation of impacted financial instruments, deferred tax assets and investments in subsidiaries.

Our procedures included an



difficult to estimate the further development of market prices and the key macroeconomic indicators. As a consequence, the valuation of financial instruments, investments in subsidiaries and the recoverability of deferred tax assets are a highly subjective area due to the level of judgement applied by the management.

Cash flow estimates and yield curves applied for the valuation of financial instruments which are related to the Russian financial market (Russian sovereign debt) contain significant judgements. As such, the exposures identified are mainly categorized as Level 3 financial instruments. The valuation of these instruments involves unobservable inputs as well and, as such, there is greater estimation uncertainty in the determination of their value.

The Company performed an impairment test on investments in subsidiaries. As a result, the Company has an impairment on its investments significantly impacted by the Russian-Ukrainian conflict. The investment impairment test model includes sensitive inputs as key assumptions, including revenue growth, operating margin and discount rate.

As a consequence of differences between the accounting and tax treatment of ECL and valuation adjustments of financial instruments the Company recognized related deductible temporary differences in the net deferred tax position in the financial statements. The recoverability of the deductible temporary differences involve significant judgement applied by the management.

Due to the significance of assets impacted by the Russian - Ukrainian conflict (representing 3% of Total Assets as of 31 December 2025) and the related estimation uncertainty, this is considered a key audit matter.

assessment of the suitability of the valuation model and the key assumptions and judgements applied by management. As part of our procedures, we reviewed key market-related assumptions in management's valuation models, country budgets and we performed benchmarking of foreign exchange rates, discount rates against external data where available. We also tested the mathematical accuracy of the cash flow models and agreed relevant data to Board approved business plans.

We evaluated pricing model methodologies against industry practice and valuation guidelines. We performed independent valuations for selected instruments and used external source data where available. We compared results of our valuations to the Company's valuations.

We also evaluated whether the disclosures in the separate financial statements appropriately reflect the estimation uncertainties of the Company as a result of the Russian - Ukrainian conflict and are compliant with the EU IFRSs.

The Company's disclosures about its risk valuation policies are included in Note 2.4 Investments in subsidiaries, associated companies and other investments, associated companies and other investments, Note 2.5.7 Securities at fair value through other comprehensive income ("FVOCI securities"), Note 2.5.2 Securities at amortised cost, Note 4: Macro environment, impact of economic situation on the Bank and which specifically explains the accounting policies and key assumptions used when determining the estimations and their evaluation are detailed in Note 9 Securities at fair value through other comprehensive income, Note 10 Securities at amortized cost and Note 12 Investments in subsidiaries, associates, joint ventures and other

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investments and Note 45.4 Fair value classes.

### Other information

Other information consists of the 2025 management report of the Company and the "Management's Analysis" section of the annual report which have been made available to us before the date of our independent auditor's report and of the "Message to the Shareholders", "Corporate Governance" and "Macroeconomic and financial environment in 2025" sections of the annual report which are expected to be made available after the date of our independent auditor's report but do not include the separate financial statements and our independent auditor's report. Management is responsible for the other information, including preparation of the management report in accordance with the Hungarian Accounting Law and other relevant legal requirements, if any. Our opinion on the separate financial statements does not cover the other information.

In connection with our audit of the separate financial statements, our responsibility is to read the other information and, in doing so, consider whether 1) the other information is materially inconsistent with the separate financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated and 2) the management report has been prepared in accordance with the Hungarian Accounting Law and other relevant legal requirements, if any, not including the requirements of Section III/A of the Hungarian Accounting Law relevant to the sustainability statement.

Our opinion on the management report should include the information required according to Subsection (2) e) and f) of Section 95/B of the Hungarian Accounting Law and we are required to confirm also whether the information prescribed in Subsection (2) a)-d) and g)-h) of Section 95/B of the Hungarian Accounting Law have been made available and whether the management report includes the sustainability statement according to Section III/A of the Hungarian Accounting Law.

When fulfilling this responsibility we have considered the following law: Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 on Supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format ("ESEF Regulation"), as such prescribing specific requirements for the management report, in relation with forming our opinion on the management report.

In our opinion, the management report of the Company, including the information required according to Subsection (2) e) and f) of Section 95/B of the Hungarian Accounting Law for 2025 is consistent, in all material respects, with the 2025 separate financial statements of the Company and the relevant requirements of the Hungarian Accounting Law and the other law listed above, not including the requirements of Section III/A of the Hungarian Accounting Law relevant to the sustainability statement.

We also confirm that the Company have made available the information required according to Subsection (2) a)-d) and g)-h) of Section 95/B of the Hungarian Accounting Law.



We also confirm, that due to the exemption applied according to Subsection 95/F of the Hungarian Accounting Law the business report does not include the sustainability statement according to Section III/A of the Hungarian Accounting Law.

Further to the above, based on the knowledge we have obtained about the Company and its environment in the course of the audit we are required to report whether we have identified any material misstatement in the other information, and if so, the nature of the misstatement in question. We have nothing to report in this regard.

When we read the sections of the annual report, which had not yet been made available to us at the date of this report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance.

#### **Responsibilities of management and those charged with governance for the separate financial statements**

Management is responsible for the preparation of separate financial statements that give a true and fair view in accordance with EU IFRSs and for the preparation in accordance with the supplementary requirements of the Hungarian Accounting Law relevant for separate financial statements prepared in accordance with EU IFRSs, and for such internal control as management determines is necessary to enable the preparation of separate financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

#### **Auditor's responsibilities for the audit of the separate financial statements**

Our objectives are to obtain reasonable assurance about whether the separate financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Hungarian National Auditing Standards and with applicable laws and regulations in Hungary, including also Regulation (EU) No. 537/2014 will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate financial statements.

As part of an audit in accordance with Hungarian National Auditing Standards and with applicable laws and regulations in Hungary, including also Regulation (EU) No. 537/2014, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:



- ▶ Identify and assess the risks of material misstatement of the separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- ▶ Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- ▶ Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- ▶ Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- ▶ Evaluate the overall presentation, structure and content of the separate financial statements, including the disclosures, and whether the separate financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance we determine those matters that were of most significance in the audit of the separate financial statements of the current period and are therefore the key audit matters.



## Report on other legal and regulatory requirements

### Report on compliance with the requirements of the regulation on the European Single Electronic Format

We have undertaken a reasonable assurance engagement on the compliance of the financial statements included in the digital file - identified in our report - prepared by the Company ("financial statements in ESEF format") with the requirements set out in the ESEF Regulation.

Responsibilities of the management and those charged with governance for the financial statements in ESEF format

The Company's management is responsible for preparing the financial statements in ESEF format that comply with the ESEF Regulation. This responsibility includes:

- ▶ the preparation of financial statements in the applicable XHTML format; and
- ▶ the design, implementation and maintenance of internal controls relevant to the application of the ESEF Regulation.

Those charged with governance are responsible for overseeing the Company's financial reporting process including compliance with the ESEF Regulation.

### Our responsibility and summary of the work performed

Our responsibility is to express an opinion on whether the financial statements in ESEF format complies, in all material respects, with the requirements of the ESEF Regulation based on the evidence we have obtained. We conducted our reasonable assurance engagement in accordance with Hungarian National Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (ISAE 3000).

A reasonable assurance engagement in accordance with ISAE 3000 involves performing procedures to obtain evidence about compliance with the ESEF Regulation. The nature, timing and extent of procedures selected depend on the auditor's judgment, including the assessment of the risks of material departures from the requirements set out in the ESEF Regulation, whether due to fraud or error. Our reasonable assurance engagement included obtaining an understanding of the Company's internal controls relevant to the application of the requirements of the ESEF Regulation and verifying whether the XHTML format was applied properly.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Opinion

In our opinion, the financial statements in ESEF format of the Company for the year ended 31 December 2025 included in the digital file - identified in our report - complies, in all material respects, with the requirements of the ESEF Regulation.



**Reporting requirements on content of auditor's report in compliance with Regulation (EU) No. 537/2014:**

**Appointment of Auditor**

We were appointed as the statutory auditor of the Company by the General Assembly of Shareholders of the Company on 25 April 2025. Total uninterrupted engagement period, including previous renewals (extension of the period for which we were originally appointed) and reappointments for the statutory auditor, has lasted for five years.

**Consistency with Additional Report to Audit Committee**

Our audit opinion on the separate financial statements expressed herein is consistent with the additional report to the audit committee of the Company, which we issued in accordance with Article 11 of the Regulation (EU) No. 537/2014 on the same date as the date of this report.

**Non-audit Services**

We declare that no prohibited non-audit services referred to in Article 5(1) of Regulation (EU) No. 537/2014 were provided by us to the Company and its controlled undertakings and we remained independent from the Company in conducting the audit.

In addition to statutory audit services and services disclosed in the management report and in the separate financial statements, no other services were provided by us to the Company and its controlled undertakings.

The engagement partner on the audit resulting in this independent auditor's report is Kónya Zsolt.

Budapest, 17 March 2026

(The original Hungarian version has been signed.)

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## This is a translation of the Hungarian Report

### Independent Auditors' Report

To the Shareholders of OTP Bank Nyrt.

#### Report on the audit of the consolidated financial statements

#### Opinion

We have audited the accompanying 2025 consolidated financial statements of OTP Bank Nyrt. ("the Company") and its subsidiaries (altogether "the Group") included in the accompanying 529900W3M0000A18X956-2025-12-31-1-hu.zip<sup>1</sup> digital file, which comprise the consolidated statement of financial position as at 31 December 2025 - showing a total assets of HUF 45,427,144 million - and a consolidated statement of comprehensive income - showing a total comprehensive income for the year of HUF 962,036 million -, the related consolidated statement of profit or loss, consolidated statement of changes in equity, consolidated statement of cash-flows for the year then ended and notes to the consolidated financial statements, including material accounting policy information.

In our opinion the consolidated financial statements give a true and fair view of the consolidated financial position of the Group as at 31 December 2025 and of its consolidated financial performance and its consolidated cash flows for the financial year then ended in accordance with International Financial Reporting Standards as adopted by the EU ("EU IFRSs") and have been prepared, in all material respects, in accordance with the supplementary requirements of Act C of 2000 on Accounting ("Hungarian Accounting Law") relevant for consolidated financial statements prepared in accordance with EU IFRSs.

#### Basis for opinion

We conducted our audit in accordance with Hungarian National Auditing Standards and with applicable laws and regulations in Hungary, including also Regulation (EU) No. 537/2014 of the European Parliament and of the Council of 16 April 2014 on specific requirements regarding statutory audit of public-interest entities ("Regulation (EU) No. 537/2014"). Our responsibilities under those standards are further described in the "Auditor's responsibilities for the audit of the consolidated financial statements" section of our report.

We are independent of the Group in accordance with the applicable ethical requirements according to relevant laws in effect in Hungary and the policy of the Chamber of Hungarian Auditors on the ethical rules and disciplinary proceedings and with the International Ethics Standards Board of Accountants' (IESBA)

<sup>1</sup> Digital identification of the above referred digital file, using SHA 256 HASH algorithm is E78D815B8BCCA95E3D1F5E6DC40DA5647AFEB64DE088489E1F746457B99A9AF2



International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) as applicable to audits of financial statements of public interest entities, and we have fulfilled our other ethical responsibilities relevant to audits of the financial statements of public interest entities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For each matter below, our description of how our audit addressed the matter is provided in that context.

We have fulfilled the responsibilities described in the "Auditor's responsibilities for the audit of the consolidated financial statements" section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the consolidated financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying consolidated financial statements.

#### Determination of loss allowance on loans at amortised cost and provision according to IFRS9 (referred together as "expected credit losses" or "ECL")

Credit impairment is a highly subjective area due to the level of judgement applied by management in determining ECL. The identification of expected credit losses and the determination of the recoverable amount are inherently uncertain processes involving various assumptions and factors. Such factors may include the financial condition of the counterparty, expected future cash flows, and expected net selling prices of collateral. The portfolios which give rise to the greatest uncertainty are typically those where expected credit loss is derived from estimates of future cash flows and the realisable value of collateral, calculated using collective ECL models, which are unsecured or are subject to potential collateral shortfalls. These models require the significant periodic judgment of management

We involved valuation specialists to assist us in performing our audit procedures on ECL. Our audit procedures included among others the following procedures.

We evaluated the design and tested the operating effectiveness of internal controls over the approval, recording and monitoring of loans at amortized cost and controls over ECL calculations, including the quality of underlying data and applications.

We evaluated the controls over the general IT environment of the applications relevant from an audit perspective related to the determination of ECL.

We evaluated management's assumptions relating to the overall uncertainties arising from the



regarding correct segmentation, the identification of significant changes in credit risk, the inclusion of forward-looking elements as well as the application of management overlay (to reflect on circumstances beyond the modelling capabilities).

Given the economic uncertainties arising from the Russian - Ukrainian conflict and the risks to the global economy, significant judgement is required in the assessment of significant changes in credit risk, the definition of default, the estimation of future cash-flows (including the value of realisable collateral) and the evaluation of forward-looking information.

Due to the significance of loans at amortised cost (representing 48% of Total Assets as of 31 December 2025) and the ECL related estimation uncertainty, this is considered a key audit matter.

geopolitical and economic situation caused by the Russian-Ukrainian conflict.

For ECL calculated on an individual basis, we tested the assumptions used by the management underlying the expected credit loss identification and quantification, focusing on borrowers with the most significant potential impact on the consolidated financial statements. We also evaluated management's assumptions on the expected future cash flows, including the value of realisable collateral and estimates of recovery, based on our own understanding and available market information.

For ECL calculated on a collective basis we evaluated the model governance, methodologies, inputs and management assumptions used (probability of default, loss given default, significant increase in credit risk and forward-looking elements).

For exposures subject to increased uncertainties arising from the Russian-Ukrainian conflict we designed additional procedures to address the higher estimation uncertainty. Such procedures, among others included: an assessment of the overall changes in the ECL model (including its parameters), an assessment of the additional criteria applied for the identification of significant changes in credit risk, territorial analysis of the value of realisable collateral of the exposures which are directly or indirectly impacted by the Russian-Ukrainian conflict, and benchmarking of the ECL coverage of the portfolio against other market participants. We assessed the sensitivity of the Ukrainian ECL models to reasonable alternative forward-looking assumptions.

We considered the regulatory measures on the assumptions applied by the management for ECL estimation purposes.

We also evaluated whether the

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disclosures in the consolidated financial statements appropriately reflect the Group's exposure to credit risk and are compliant with the EU IFRSs.

The Group's disclosures about its risk management policies are included in Note 2.6 Loss allowance and Note 37.1 Credit risk which specifically explains the key assumptions used when determining credit risk and their evaluation are described in Note 4: Macro environment, impact of economic situation on the Group, Note 11 Loans at amortized cost and at fair value and Note 31 Loss allowances / Impairment / Provisions.

#### General Information Technology controls over the financial reporting process

A significant part of the Group's financial reporting process, including revenue recognition, is significantly reliant on IT systems with embedded automated processes and controls over the capture, storage and extraction of information. A fundamental component of these processes and controls is ensuring appropriate user access and change management protocols exist and are being adhered to.

These protocols are important because they ensure that access and changes to IT systems and related data are made and authorized in an appropriate manner.

As our audit of the consolidated financial statements sought to place a high level of reliance on IT systems and application controls related to financial reporting, a high proportion of the overall audit effort has been carried out regarding to understand and test IT infrastructure and applications including relevant application controls. Furthermore, the complexity of IT systems and nature of application controls requires special technology expertise and specialized skills to be involved in the audit we therefore consider this as a key audit matter.

We focused our audit on those IT systems and controls that are significant for the Group's financial reporting. As audit procedures over the IT systems and application controls require specific expertise, we involved IT audit specialists to assist us in performing our audit procedures. Our audit procedures included among others the following procedures.

We understood and assessed the overall IT control environment and the controls in place which included controls over access to systems and data, as well as system changes. We adjusted our audit approach based on the financial significance of the system and whether there were automated procedures supported by that system.

As part of our audit procedures, we tested the operating effectiveness of controls over appropriate access rights to assess whether only appropriate users had the ability to create, modify or delete user accounts for the relevant in-scope applications. We also tested the operating effectiveness of controls around system development and



program changes to establish that changes to the system were appropriately authorized, developed and implemented. Additionally, we assessed and tested the design and operating effectiveness of the application controls embedded in the processes relevant to our audit.

The Group's disclosures about its IT systems and related IT general and application controls are included in section System of internal controls and IT Controls in the consolidated management report.

Estimation uncertainties as a result of the Russian - Ukrainian conflict (excluding expected credit losses relating to loans at amortised cost)

On 24 February 2022, the Russian army started military operations in Ukraine, which are still ongoing at the date of our audit report. In connection to this, there have been, among others, impacts on businesses in Ukraine and Russia. The sanctions implemented caused an unforeseen rise and volatility of market prices, foreign exchange and interest rates. It is difficult to estimate the further development of market prices and the key macroeconomic indicators. As a consequence, the valuation of financial instruments, goodwill and the recoverability of deferred tax assets are a highly subjective area due to the level of judgement applied by the management.

Cash flow estimates and yield curves applied for the valuation of financial instruments which are related to the Russian and Ukrainian financial markets (Russian and Ukrainian sovereign debt, derivatives linked to Ukrainian Hryvnia or Russian Rubles), contain significant judgements. As such, the exposures identified are mainly categorized as Level 3 financial instruments. The valuation of these instruments involves unobservable inputs as well and, as such, there is greater estimation uncertainty in the determination of their value.

We involved valuation specialists to assist us in performing our audit procedures which included among others the following procedures.

We evaluated the appropriateness of the Group's controls over the valuation of impacted financial instruments, deferred tax assets and goodwill.

Our procedures included an assessment of the suitability of the valuation model and the key assumptions and judgements applied by management. As part of our procedures, we reviewed key market-related assumptions in management's valuation models, country budgets and we performed benchmarking of foreign exchange rates, discount rates against external data where available. We also tested the mathematical accuracy of the cash flow models and agreed relevant data to Board approved business plans.

We evaluated pricing model methodologies against industry practice and valuation guidelines. We performed independent valuations for selected instruments and used external source data where available. We compared results of our valuations to the Group's valuations.



As a consequence of differences between the accounting and tax treatment of ECL and valuation adjustments of financial instruments, the Russian operation of the Group recognized deferred tax assets. Based on the available business plans the Russian operation of the Group will be able to utilize the deferred tax assets. The recoverability of deferred tax assets involves significant judgement applied by the management.

Due to the conflict, the Group performed an impairment test of goodwill. As a result, the Group fully impaired the goodwill relating to the Russian operation in 2022 and as such the book value at the end of 2025 is nil. The goodwill impairment test model includes sensitive inputs and significant judgement applied by the management as key assumptions.

Due to the significance of assets impacted by the Russian - Ukrainian conflict (representing 2% of Total Assets as of 31 December 2025) and the related estimation uncertainty, this is considered a key audit matter.

We also evaluated whether the disclosures in the consolidated financial statements appropriately reflect the estimation uncertainties of the Group as a result of the Russian - Ukrainian conflict and are compliant with the EU IFRSs.

The Group's disclosures about its risk valuation policies are included in Note 2.5.3. Financial assets at fair value through profit or loss, Note 2.5.7 Securities at fair value through other comprehensive income, Note 2.5.2 Securities at amortized cost, Note 3.4. Impairment on goodwill, Note 4: Macro environment, impact of economic situation on the Group, which specifically explains the accounting policies and key assumptions used when determining the estimations and their evaluation, are detailed in Note 8 Financial assets at fair value through profit or loss, Note 9 Securities at fair value through other comprehensive income, Note 10 Securities at amortized cost, Note 13 Property, equipment and intangible assets, Note 35 Income taxes and Note 47.4. Fair value levels.

### Other information

Other information consists of the 2025 consolidated management report of the Group and the "Management's Analysis" section of the annual report which have been made available to us before the date of our independent auditor's report and of the "Message to the Shareholders", "Corporate Governance" and "Macroeconomic and financial environment in 2025" sections of the annual report which are expected to be made available after the date of our independent auditor's report but do not include the consolidated financial statements and our independent auditor's report. Management is responsible for the other information, including preparation of the consolidated management report in accordance with the Hungarian Accounting Law and other relevant legal requirements, if any. Our opinion on the consolidated financial statements does not cover the other information.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether 1) the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated and 2) the consolidated management report has been prepared in accordance with the Hungarian Accounting Law and other relevant legal



requirements, if any, not including the requirements of Section VI/C of the Hungarian Accounting Law relevant to the consolidated sustainability statement.

Our opinion on the consolidated management report should include the information required according to Subsection (2) e) and f) of Section 95/B of the Hungarian Accounting Law and we are required to confirm also whether the information prescribed in Subsection (2) a)-d) and g)-h) of Section 95/B of the Hungarian Accounting Law have been made available and whether the consolidated management report includes the consolidated sustainability statement according to Section VI/C of the Hungarian Accounting Law.

When fulfilling this responsibility we have considered the following law: Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 on Supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format ("ESEF Regulation"), as such prescribing specific requirements for the consolidated management report, in relation with forming our opinion on the consolidated management report.

In our opinion, the consolidated management report of the Group, including the information required according to Subsection (2) e) and f) of Section 95/B of the Hungarian Accounting Law for 2025 is consistent, in all material respects, with the 2025 consolidated financial statements of the Group and the relevant requirements of the Hungarian Accounting Law and the other law listed above, not including the requirements of Section VI/C of the Hungarian Accounting Law relevant to the consolidated sustainability statement.

We also confirm that the Group have made available the information required according to Subsection (2) a)-d) and g)-h) of Section 95/B of the Hungarian Accounting Law.

We also confirm that the consolidated management report includes the consolidated sustainability statement according to Section VI/C of the Hungarian Accounting Law. Based on limited assurance engagement we issue separate report whether the consolidated sustainability statement is prepared in accordance with the requirements of Section VI/C of the Hungarian Accounting Law relevant to the consolidated sustainability statement.

Further to the above, based on the knowledge we have obtained about the Group and its environment in the course of the audit we are required to report whether we have identified any material misstatement in the other information, and if so, the nature of the misstatement in question. We have nothing to report in this regard.

When we read the sections of the annual report, which had not yet been made available to us at the date of this report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance.



### **Responsibilities of management and those charged with governance for the consolidated financial statements**

Management is responsible for the preparation of consolidated financial statements that give a true and fair view in accordance with EU IFRSs and for the preparation in accordance with the supplementary requirements of the Hungarian Accounting Law relevant for consolidated financial statements prepared in accordance with EU IFRSs, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

### **Auditor's responsibilities for the audit of the consolidated financial statements**

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Hungarian National Auditing Standards and with applicable laws and regulations in Hungary, including also Regulation (EU) No. 537/2014 will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with Hungarian National Auditing Standards and with applicable laws and regulations in Hungary, including also Regulation (EU) No. 537/2014, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- ▶ Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- ▶ Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- ▶ Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.



- ▶ Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- ▶ Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- ▶ Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters.

#### Report on other legal and regulatory requirements

##### Report on compliance with the requirements of the regulation on the European Single Electronic Format:

We have undertaken a reasonable assurance engagement on the compliance of the consolidated financial statements included in the digital file - identified in our report - prepared by the Group ("consolidated financial statements in ESEF format") with the requirements set out in the ESEF Regulation.

Responsibilities of the management and those charged with governance for the consolidated financial statements in ESEF format



The Company's management is responsible for preparing the consolidated financial statements in ESEF format that comply with the ESEF Regulation. This responsibility includes:

- ▶ the preparation of the consolidated financial statements in the applicable XHTML format;
- ▶ the selection and application of appropriate iXBRL tags as required by ESEF Regulation using judgement where necessary; including completeness of use of the relevant tags, appropriateness of creation and anchoring of the extension elements; and
- ▶ the design, implementation and maintenance of internal controls relevant to the application of the ESEF Regulation.

Those charged with governance are responsible for overseeing the Group's financial reporting process including compliance with the ESEF Regulation.

#### Our responsibility and summary of the work performed

Our responsibility is to express an opinion on whether the consolidated financial statements in ESEF format complies, in all material respects, with the requirements of the ESEF Regulation based on the evidence we have obtained. We conducted our reasonable assurance engagement in accordance with Hungarian National Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (ISAE 3000).

A reasonable assurance engagement in accordance with ISAE 3000 involves performing procedures to obtain evidence about compliance with the ESEF Regulation. The nature, timing and extent of procedures selected depend on the auditor's judgment, including the assessment of the risks of material departures from the requirements set out in the ESEF Regulation whether due to fraud or error. Our reasonable assurance engagement included obtaining an understanding of the tagging, obtaining an understanding of the Group's internal controls relevant to the application of the requirements of the ESEF Regulation, verifying whether the XHTML format was applied properly, evaluating the completeness of the Group's tagging of the consolidated financial statements using the XBRL markup language, evaluating the appropriateness of the Group's use of iXBRL elements selected from the ESEF taxonomy and the creation of extension elements where no suitable element in the ESEF taxonomy has been identified and evaluating the use of anchoring in relation to the extension elements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### Opinion

In our opinion, the consolidated financial statements in ESEF format of the Group for the year ended 31 December 2025 included in the digital files -identified in our report - complies, in all material respects, with the requirements of the ESEF Regulation.



### Reporting requirements on content of auditor's report in compliance with Regulation (EU) No. 537/2014:

#### Appointment of Auditor

We were appointed as the statutory auditor of OTP Bank Nyrt. by the General Assembly of Shareholders of the Company on 25 April 2025. Total uninterrupted engagement period, including previous renewals (extension of the period for which we were originally appointed) and reappointments for the statutory auditor, has lasted for five years.

#### Consistency with Additional Report to Audit Committee

Our audit opinion on the consolidated financial statements expressed herein is consistent with the additional report to the audit committee of the Company, which we issued in accordance with Article 11 of the Regulation (EU) No. 537/2014 on the same date as the date of this report.

#### Non-audit Services

We declare that no prohibited non-audit services referred to in Article 5(1) of Regulation (EU) No. 537/2014 were provided by us to the Company and its controlled undertakings and we remained independent from the Group in conducting the audit.

In addition to statutory audit services and services disclosed in the consolidated management report and in the consolidated financial statements, no other services were provided by us to the Company and its controlled undertakings.

The engagement partner on the audit resulting in this independent auditor's report is Kónya Zsolt.

Budapest, 17 March 2026

(The original Hungarian version has been signed.)

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This is a translation of the Hungarian Report  
Independent auditor's limited assurance report

To the Shareholders of OTP Bank Nyrt.

### Scope

We have been engaged by OTP Bank Nyrt. ("the Company") to perform a 'limited assurance engagement', as defined by Hungarian National Standards on Assurance Engagements, here after referred to as the engagement, to report on the consolidated sustainability statement of the Company and its subsidiaries (altogether the "Group") as at 31 December 2025 and for the financial year then ended, presented in section "OTP Group Sustainability Report 2025" of the consolidated management report included in the accompanying 529900W3MOO00A18X956-2025-12-31-1-hu.zip digital file<sup>1</sup>.

### Criteria applied by the Group

In preparing the consolidated sustainability statement, the Group applied the requirements set out in VI/C - in case of consolidated Chapter of Act C of 2000 on Accounting ("Hungarian Accounting Law") - which implements Article 29(a) of Directive 2013/34/EU of the European Parliament and of the Council - on consolidated sustainability statement, including:

- compliance with the European Sustainability Reporting Standards ("ESRS"), including that the double materiality assessment process carried out by the Group to identify the information reported in the consolidated sustainability statement ("Double Materiality Assessment") is in accordance with ESRS and with the description disclosed in section "1.4 Impact, risk and opportunity management" of the consolidated sustainability statement, as required by ESRS 2 IRO-1, and
- compliance of the disclosures presented in section "2.3 EU Taxonomy: Disclosures under the EU Taxonomy Regulation" of the consolidated sustainability statement with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 ("Taxonomy Regulation"),

All together referred as "the Criteria".

<sup>1</sup> Digital identification of the above referred digital file, using SHA 256 HASH algorithm is E78D815B8BCCA95E3D1F5E6DC40DA5647AFEB64DE088489E1F746457B99A9AF2



### Inherent limitations in preparing the consolidated sustainability statement

Non-financial performance information has inherent limitations compared to financial information, given the characteristics of its subject matter, the methods used to define, calculate, sample and estimate such information.

The Criteria, the nature of sustainability statements and the lack of long-standing guidance, common application and reporting practices allow for the use of different but acceptable measurement methods, which may result in differences between organizations. The qualitative interpretation of relevance, materiality and accuracy of data depends on individual assumptions and judgements. It is therefore important that the information is interpreted in conjunction with the methodology applied by management and described in the consolidated sustainability statement, for which management is responsible.

The measurement methods used may also affect the comparability of sustainability issues reported by different companies and, in the case of the Group, from one year to another, as the methodologies used may vary.

In reporting forward-looking information in accordance with ESRS, management of the Company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the consolidated sustainability statement, management of the Company interprets undefined legal and other terms, which may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

### Responsibilities of management and those charged with governance for the consolidated sustainability statement

The Company's management is responsible for presenting the consolidated sustainability statement, in accordance with the Criteria in all material respects, including the compliance with Hungarian Accounting Law, ESRS, Taxonomy regulation including:

- maintaining adequate records relevant for the consolidated sustainability statement,
- establishing and maintaining internal controls that management determines are necessary to enable the preparation of the consolidated sustainability statement, that it is free from material misstatement, whether due to fraud or error,
- selection and application of appropriate sustainability reporting methods, and
- making assumptions and estimates of each sustainability disclosure that are reasonable in the circumstances.

Management of the Company is responsible for the Double Materiality Assessment to identify the information to be reported in the consolidated sustainability statement in accordance with the ESRS and for disclosing this process in the consolidated sustainability statement.



This responsibility includes:

- understanding the context in which the Company's activities and business relationships take place and developing an understanding of its affected stakeholders, and identifying the needs of stakeholders as intended users of sustainability information;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the entity's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate materiality thresholds; and
- making assumptions that are reasonable in the circumstances.

The management of the Company is further responsible for the additional entity-specific disclosures selected are suitable in accordance with ESRS and available to the users of the consolidated sustainability statement.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.

#### Auditor's responsibilities for the assurance engagement

Our responsibility is to express a conclusion on the presentation of the consolidated sustainability statement based on the evidence we have obtained.

We conducted our engagement in accordance with the Hungarian National Standards for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE 3000 (Revised)") and for Assurance engagements on Greenhouse gas Statements ("ISAE 3410") and we exercise professional judgement and maintain professional skepticism throughout the engagement.

Those standards require that we plan and perform our engagement to obtain limited assurance about whether the consolidated sustainability statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error. Misstatements are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the consolidated sustainability statement as a whole. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.



Our responsibilities in respect of the consolidated sustainability statement, in relation to the Double Materiality Assessment, include:

- obtaining an understanding of the Double Materiality Assessment process carried out by the Group, but not for the purpose of providing a conclusion on its effectiveness, including its outcome,
- considering whether the identified information complies with the applicable disclosure requirements of the ESRS,
- designing and performing procedures to evaluate whether the Double Materiality Assessment is consistent with the description disclosed in the consolidated sustainability statement

Our other responsibilities in respect of the consolidated sustainability statement include:

- obtaining an understanding of the Group's control environment, processes and information systems relevant to the preparation of the consolidated sustainability statement but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness,
- identifying disclosures where material misstatements are likely to arise, whether due to fraud or error,
- designing and performing procedures responsive to disclosures where material misstatements are likely to arise.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

Our independence and quality management

We are independent of the Group in accordance with the applicable ethical requirements according to relevant laws in effect in Hungary and the policy of the Chamber of Hungarian Auditors on the ethical rules and disciplinary proceedings and with the International Ethics Standards Board of Accountants' (IESBA) International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) as applicable to audits of financial statements of public interest entities, and we have fulfilled our other ethical responsibilities relevant to audits of the financial statements of public interest entities in accordance with these requirements.

Our firm applies Hungarian National Standard on Quality Management 1 (ISQM1), Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



### Summary of procedures performed

A limited assurance engagement involves performing procedures to obtain evidence related to sustainability information. Both the procedures for assessing risks, including an understanding of internal controls, and the procedures performed in response to the assessed risks in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we obtained understanding and considered the effectiveness of Group's internal controls, processes and information systems relevant to the preparation of Double Materiality Assessment and the consolidated sustainability statement when determining the nature and extent of our procedures, our limited assurance engagement was not designed to provide assurance on design and operating effectiveness of the internal controls, processes and information systems, including the outcome of the Double Materiality Assessment. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within information systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the consolidated sustainability statement and related sustainability information, observing processes carried out, reviewing documents, assessing the adequacy of the quantification methods and the reporting policies developed and applying analytical, reconciliation and other review procedures.

Our procedures included the following, we:

1. involved sustainability specialists to evaluate compliance of the consolidated sustainability statement with the Criteria,
2. conducted interviews with the management, the key personnel and with the management's experts to obtain an understanding of the Group's governance structure, policies, procedures, internal controls and information systems relevant for the preparation and presentation of the consolidated sustainability statement,
3. in relation to the Double Materiality Assessment we performed the following procedures:
  - a. we conducted interviews with management, key personnel and management's experts and reviewed the Company's Double Materiality Assessment to obtain understanding of the process and to understand the sources of the information used by management,
  - b. reviewed the Company's internal documentation and assessed whether the Double Materiality Assessment is in accordance with ESRS and with the description disclosed in consolidated sustainability statement,
4. conducted risk assessment including setting levels of materiality and identified sustainability information and disclosures of the consolidated sustainability statement where risk of material misstatements are likely to arise, whether due to fraud or error,



5. involved component assurance teams based on the risk assessment,
6. evaluated whether information identified by the Double Materiality Assessment as material information is included in the consolidated sustainability statement,
7. evaluated whether the structure and the presentation of the consolidated sustainability statement is in accordance with the ESRS,
8. on selected material sustainability information and disclosures of the consolidated sustainability statement we performed procedures as follows:
  - a. conducted interviews with key personnel from relevant organizational units of the Group and conducted site visits (if required) to obtain understanding of the process for collecting, collating and reporting the sustainability information and disclosures,
  - b. obtained evidence on the methods for developing material estimates and forward-looking information and on how these methods were applied, and what data and assumptions were used,
  - c. designed and executed basic review procedures including among others analytical review procedures, sample testing, recalculation and inspection of substantiating evidences,
  - d. evaluated the mathematical accuracy of quantitative sustainability information and disclosures,
  - e. reviewed the boundaries of reporting and whether there are material omissions in accordance with ESRS,
  - f. evaluated the completeness and compliance with ESRS and the mandatory disclosures therein,
  - g. evaluated the appropriateness of entity-specific disclosures
  - h. reviewed consistency with the consolidated financial statements of the Group as at 31 December 2025, and with other information obtained from interviews, internal policies and other external and internal communications and publications about the Company's sustainability agenda and strategy,
9. obtained an understanding of the process to calculate the Green Asset Ratio and the preparation of corresponding disclosures in the Sustainability Statement and evaluated the completeness and compliance with Taxonomy Regulation.

We also performed such other procedures as we considered necessary in the circumstances.

#### Other matter

Section 134/L of the Hungarian Accounting Law requires that we provide limited assurance conclusion on the compliance of the consolidated sustainability statement prepared in the electronic reporting format (XHTML) with the tagging requirements in accordance with the applicable ESEF taxonomy set out in Commission Delegated Regulation (EU) 2019/815 (ESEF Regulation) relevant for sustainability disclosures, including those required according to article 8 of Regulation (EU) 2020/852 as well. Considering that the ESEF taxonomy relevant for sustainability statement has not been adopted yet, the Company, as it is presented in Section 1.1.1 General basis for preparation of the sustainability statement of the consolidated sustainability statement, was unable to carry out the tagging of the sustainability disclosures, and consequently we are unable to draw any conclusion in this regard.



## Conclusion

Based on our procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the consolidated sustainability statement of the Group as at 31 December 2025 and for the financial year then ended, is not prepared, in all material respects, in accordance with the Criteria.

Budapest, 17 March 2026

(The original Hungarian version has been signed.)

Kónya Zsolt  
Ernst & Young Kft.  
1132 Budapest, Váci út 20.  
Registration No. 001165

Kónya Zsolt  
Registered auditor  
Chamber membership No.: 007383

# IFRS FINANCIAL STATEMENTS ON 2025

(SEPARATE)

**OTP BANK PLC.**  
**SEPARATE STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2025**  
**(in HUF mn)**

	Note	31 December 2025	31 December 2024
Cash, amounts due from banks and balances with the National Bank of Hungary	5.	1,359,760	2,075,179
Placements with other banks	6.	3,161,544	2,948,536
Repo receivables	7.	322,368	238,079
Financial assets at fair value through profit or loss	8.	350,781	651,236
Financial assets at fair value through other comprehensive income	9.	1,265,443	592,602
Securities at amortised cost	10.	3,368,087	3,334,145
Loans at amortised cost	11.	5,135,324	4,670,795
Loans mandatorily measured at fair value through profit or loss	11.	1,082,688	998,410
Investments in subsidiaries	12.	2,170,130	2,169,031
Property and equipment	13.	120,331	111,772
Intangible assets	13.	190,825	137,860
Right of use assets	35.	58,916	58,956
Investment properties	14.	4,332	4,227
Deferred tax assets	34.	568	-
Derivative financial assets designated as hedge accounting	15.	27,099	43,130
Other assets	16.	<u>383,177</u>	<u>357,095</u>
<b>TOTAL ASSETS</b>		<b><u>19,001,373</u></b>	<b><u>18,391,053</u></b>
Amounts due to banks and deposits from the National Bank of Hungary and other banks	17.	1,656,367	1,606,969
Repo liabilities	18.	377,532	227,632
Deposits from customers	19.	11,391,727	10,891,924
Fair value changes of the hedged items in portfolio hedge of interest rate risk	19.	471	4,303
Leasing liabilities	35.	62,640	64,380
Liabilities from issued securities	20.	1,341,250	1,750,893
Financial liabilities designated at fair value through profit or loss	21.	15,279	17,024
Derivative financial liabilities designated as held for trading	22.	94,022	144,499
Derivative financial liabilities designated as hedge accounting	23.	6,682	19,438
Deferred tax liabilities	34.	-	1,707
Current tax liabilities	34.	18,589	23,591
Provisions	24.	50,347	25,647
Other liabilities	24.	483,161	449,522
Subordinated bonds and loans	25.	<u>493,587</u>	<u>362,271</u>
<b>TOTAL LIABILITIES</b>		<b><u>15,991,654</u></b>	<b><u>15,589,800</u></b>
Share capital	26.	28,000	28,000
Retained earnings and reserves	27.	3,309,633	2,896,319
Treasury shares	28.	<u>(327,914)</u>	<u>(123,066)</u>
<b>TOTAL SHAREHOLDERS' EQUITY</b>		<b><u>3,009,719</u></b>	<b><u>2,801,253</u></b>
<b>TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY</b>		<b><u>19,001,373</u></b>	<b><u>18,391,053</u></b>

Budapest, 17 March 2026

Dr. Sándor Csányi  
Chairman of the Board of Directors

Péter Csányi  
Chief Executive Officer

**OTP BANK PLC.**  
**SEPARATE STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED**  
**31 DECEMBER 2025 (in HUF mn)**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<i>Interest Income:</i>			
Interest income calculated using the effective interest method	29.	952,686	1,040,534
Income similar to interest income	29.	<u>590,190</u>	<u>585,619</u>
<b>Interest income and similar to interest income total</b>		<b><u>1,542,876</u></b>	<b><u>1,626,153</u></b>
<i>Interest Expense:</i>			
<b>Interest expenses total</b>	29.	<b><u>(944,802)</u></b>	<b><u>(1,107,551)</u></b>
<b>NET INTEREST INCOME</b>		<b><u>598,074</u></b>	<b><u>518,602</u></b>
Loss allowance on loan, placement and repo receivables losses	6., 7., 11., 30.	(10,222)	(19,955)
Release of loss allowance / (Loss allowance) on securities at fair value through other comprehensive income and on securities at amortised cost	9., 10., 30.	4,101	(35,128)
Provision for loan commitments and financial guarantees given	24., 30.	(744)	(2,565)
Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit or loss	45.4.	<u>1,016</u>	<u>4,193</u>
<b>Risk cost total</b>		<b><u>(5,849)</u></b>	<b><u>(53,455)</u></b>
<b>NET INTEREST INCOME AFTER RISK COST</b>		<b><u>592,225</u></b>	<b><u>465,147</u></b>
<b>LOSSES ARISING FROM DERECOGNITION OF FINANCIAL ASSETS MEASURED AT AMORTISED COST</b>		<b><u>(5,223)</u></b>	<b><u>(9,856)</u></b>
<b>MODIFICATION LOSS</b>	4.	<b><u>(1,470)</u></b>	<b><u>(1,999)</u></b>
Income from fees and commissions	31.	569,658	468,566
Expenses from fees and commissions	31.	<u>(119,110)</u>	<u>(92,217)</u>
<b>NET PROFIT FROM FEES AND COMMISSIONS</b>		<b><u>450,548</u></b>	<b><u>376,349</u></b>
Foreign exchange gains and (losses)	32.	52	(6,885)
Gains on securities, net	32.	20,964	120,863
(Losses) / Gains on financial instruments at fair value through profit or loss	32.	(8,123)	27,377
Net results on derivative instruments and hedge relationships	32.	30,159	(6,063)
Dividend income	32.	412,324	413,262
Other operating income	33.	35,523	18,380
Other operating expenses	33.	<u>(91,505)</u>	<u>(37,072)</u>
<b>NET OPERATING INCOME</b>		<b><u>399,394</u></b>	<b><u>529,862</u></b>
Personnel expenses	33.	(230,611)	(200,268)
Depreciation and amortization	33.	(76,122)	(63,551)
Other administrative expenses	33.	<u>(397,772)</u>	<u>(284,128)</u>
<b>OTHER ADMINISTRATIVE EXPENSES</b>		<b><u>(704,505)</u></b>	<b><u>(547,947)</u></b>
<b>PROFIT BEFORE INCOME TAX</b>		<b><u>730,969</u></b>	<b><u>811,556</u></b>
Income tax expense	34.	<u>(67,710)</u>	<u>(66,557)</u>
<b>PROFIT AFTER INCOME TAX</b>		<b><u>663,259</u></b>	<b><u>744,999</u></b>
Earnings per share (in HUF)			
Basic	43.	<u>2,464</u>	<u>2,692</u>
Diluted	43.	<u>2,464</u>	<u>2,692</u>

**OTP BANK PLC.**  
**SEPARATE STATEMENT OF COMPREHENSIVE INCOME**  
**FOR THE YEAR ENDED 31 DECEMBER 2025 (in HUF mn)**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>PROFIT AFTER INCOME TAX</b>		<b><u>663,259</u></b>	<b><u>744,999</u></b>
<b>Items that may be reclassified subsequently to profit or loss:</b>			
Fair value adjustment of debt instruments at fair value through other comprehensive income		(641)	9,751
Deferred tax related to fair value adjustment of debt instruments at fair value through other comprehensive income	34.	75	(848)
Gains / (Losses) on separated currency spread of financial instruments designated as hedging instrument		1,551	(359)
Deferred tax related to gains / (losses) on separated currency spread of financial instruments designated as hedging instrument	34.	(140)	32
Gains on derivative financial instruments designated as cash flow hedge		1,291	136
<b>Items that will not be reclassified to profit or loss:</b>			
Fair value adjustment of equity instruments at fair value through other comprehensive income		(741)	11,547
Deferred tax related to equity instruments at fair value through other comprehensive income	34.	<u>84</u>	<u>(1,305)</u>
<b>Total</b>		<b><u>1,479</u></b>	<b><u>18,954</u></b>
<b>TOTAL COMPREHENSIVE INCOME</b>		<b><u>664,738</u></b>	<b><u>763,953</u></b>

**OTP BANK PLC.**  
**SEPARATE STATEMENT OF CHANGES IN SHAREHOLDERS' EQUITY FOR THE YEAR ENDED 31**  
**DECEMBER 2025**  
(in HUF mn)

	Note	Share Capital	Capital reserve	Retained earnings and other reserves	Treasury Shares	Total
<b>Balance as at 1 January 2024</b>		<b>28,000</b>	<b>52</b>	<b>2,276,707</b>	<b>(6,154)</b>	<b>2,298,605</b>
Profit after income tax		-	-	744,999	-	744,999
Other comprehensive income		=	=	<u>18,954</u>	=	<u>18,954</u>
<b>Total comprehensive income</b>		=	=	<b><u>763,953</u></b>	=	<b><u>763,953</u></b>
Share-based payment	39.	-	-	4,411	-	4,411
Sale of treasury shares	28.	-	-	-	36,193	36,193
Acquisition of treasury shares	28.	-	-	-	(153,105)	(153,105)
Loss on treasury shares	28.	-	-	1,196	-	1,196
Dividend for the year 2023		=	=	<u>(150,000)</u>	=	<u>(150,000)</u>
<b>Other transaction with owners</b>		=	=	<b><u>(144,393)</u></b>	<b><u>(116,912)</u></b>	<b><u>(261,305)</u></b>
<b>Balance as at 31 December 2024</b>		<b><u>28,000</u></b>	<b><u>52</u></b>	<b><u>2,896,267</u></b>	<b><u>(123,066)</u></b>	<b><u>2,801,253</u></b>
<b>Balance as at 1 January 2025</b>		<b>28,000</b>	<b>52</b>	<b>2,896,267</b>	<b>(123,066)</b>	<b>2,801,253</b>
Profit after income tax		-	-	663,259	-	663,259
Other comprehensive income		=	=	<u>1,479</u>	=	<u>1,479</u>
<b>Total comprehensive income</b>		=	=	<b><u>664,738</u></b>	=	<b><u>664,738</u></b>
Share-based payment	39.	-	-	5,391	-	5,391
Sale of treasury shares	28.	-	-	-	44,896	44,896
Acquisition of treasury shares	28.	-	-	-	(249,744)	(249,744)
Loss on sale of treasury shares	28.	-	-	13,185	-	13,185
Dividend for the year 2024		=	=	<u>(270,000)</u>	=	<u>(270,000)</u>
<b>Other transaction with owners</b>		=	=	<b><u>(251,424)</u></b>	<b><u>(204,848)</u></b>	<b><u>(456,272)</u></b>
<b>Balance as at 31 December 2025</b>		<b><u>28,000</u></b>	<b><u>52</u></b>	<b><u>3,309,581</u></b>	<b><u>(327,914)</u></b>	<b><u>3,009,719</u></b>

**OTP BANK PLC.**  
**SEPARATE STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2025**  
**(in HUF mn)**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>OPERATING ACTIVITIES</b>			
<b>Profit before income tax</b>		<b>730,969</b>	<b>811,556</b>
Net accrued interest		(45,875)	8,015
Depreciation and amortization	13.	76,283	63,700
Loss allowance on loans and placements	30.	14,050	23,478
Loss allowance on securities at fair value through other comprehensive income	9.	972	24,560
Impairment loss on investments in subsidiaries	12.	44,299	7,428
(Release of loss allowance) / Loss allowance on securities at amortised	10.	(5,073)	10,568
Loss allowance on other assets	16.	12,914	5,514
Provision on off-balance sheet commitments and contingent liabilities	24.	23,728	2,561
Share-based payment	39.	5,391	4,411
Unrealised losses / (gains) on fair value adjustment of financial instruments at fair value through profit or loss	45.	6,872	(31,315)
Unrealised gains on fair value adjustment of derivative financial	45.	(34,354)	(21,014)
Gains on securities	32.	2,031	7,017
Interest expense from leasing liabilities	35.	(2,443)	(2,495)
Foreign exchange gain / (loss)	32.	(86,008)	69,407
Proceeds from sale of tangible and intangible assets	33.	(1,245)	19
<b><u>Net changes in assets and liabilities in operating activities</u></b>			
Net increase in placements with other banks and repo receivables before allowance for placement losses	6., 7.	(366,965)	(214,250)
Changes in held for trading securities	8.	290,219	(419,957)
Change in financial instruments mandatorily measured at fair value through profit or loss	8.	(2,228)	3,727
Changes in derivative financial instruments at fair value through profit	8.	(81,242)	108,979
Net (increase) / decrease in loans	11.	(717,596)	87,202
(Increase) / Decrease in other assets, excluding advances for investments and before provisions for losses	16.	(85,866)	(6,918)
Net increase in amounts due to banks and deposits from the National Bank of Hungary and other banks and repo liabilities	17., 18.	368,241	(523,976)
Financial liabilities designated as fair value through profit or loss	21.	(1,398)	(1,446)
Net increase in deposits from customers	19.	702,651	(48,969)
Increase/(decrease) in other liabilities	24.	26,161	133,922
Net decrease / (increase) in the compulsory reserve established by the National Bank of Hungary	5.	161,345	(20,036)
Dividend income	12.	(412,324)	(413,262)
Income tax paid		<u>(63,338)</u>	<u>(37,966)</u>
<b>Net cash provided by operating activities</b>		<b><u>560,171</u></b>	<b><u>(369,540)</u></b>

**OTP BANK PLC.**  
**SEPARATE STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2025**  
**(in HUF mn) [continued]**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>INVESTING ACTIVITIES</b>			
Purchase securities at fair value through other comprehensive income	9.	(1,085,985)	(375,295)
Proceeds from sale of securities at fair value through other comprehensive income	9.	415,859	347,083
Change in derivative financial instruments designated as hedge accounting		(48,889)	(22,624)
Increase in investments in subsidiaries	12.	(70,088)	(16,479)
Dividend income		428,803	435,295
Increase in securities at amortised cost	10.	(30,356,872)	(90,219,009)
Redemption of securities at amortised cost	10.	30,234,395	89,669,606
Additions to property, equipment and intangible assets	13.	(107,352)	(101,092)
Disposal of property, equipment and intangible assets	13.	1,875	333
Net increase in investment properties	14.	<u>(266)</u>	<u>(173)</u>
<b>Net cash used in investing activities</b>		<b><u>(588,520)</u></b>	<b><u>(282,355)</u></b>
<b>FINANCING ACTIVITIES</b>			
Leasing payments		(6,827)	(6,594)
Cash received from issuance of securities	20.	220,447	960,124
Cash used for redemption of issued securities	20.	(496,552)	(491,946)
Cash received from issuance of subordinated bonds and loans	25.	362,293	16,314
Cash used for redemption of subordinated bonds and loans	25.	(143,553)	(213,410)
Purchase of Treasury shares	28.	(249,744)	(153,105)
Sale of Treasury shares	28.	58,081	37,389
Dividends paid	27.	<u>(269,870)</u>	<u>(149,966)</u>
<b>Net cash used in financing activities</b>		<b><u>(525,725)</u></b>	<b><u>(1,194)</u></b>
<b>Net decrease in cash and cash equivalents</b>		<b><u>(554,074)</u></b>	<b><u>(653,089)</u></b>
<b>Cash and cash equivalents at the beginning of the year</b>		<b><u>911,836</u></b>	<b><u>1,564,925</u></b>
<b>Cash and cash equivalents at the end of the year</b>		<b><u>357,762</u></b>	<b><u>911,836</u></b>
<i>Interest received</i>		<i>1,476,496</i>	<i>1,574,048</i>
<i>Interest paid</i>		<i>907,254</i>	<i>1,016,302</i>

**NOTE 1: ORGANIZATION AND BASIS OF FINANCIAL STATEMENTS****1.1. General information**

OTP Bank Plc. ("Bank" or "OTP Bank") was established on 31 December 1990, when the previously State-owned company was transformed into a limited liability company.

The Bank's registered office address is 16, Nádor Street, Budapest 1051. Internet homepage: <http://www.otpbank.hu/>

These Separate Financial Statements were approved by the Board of Directors and authorised for issue on 17 March 2026. Signatory of the separate financial statements is the Chairman of the Board of Directors, dr. Sándor Csányi and Chief Executive Officer, Péter Csányi.

The Bank's owners have the power to amend the separate financial statements after issue if applicable.

Responsible person for the control and management of accounting services: Zoltán Tuboly (Budapest), Managing Director of Accounting and Financial Directorate, Registration Number: 177289, IFRS qualified chartered accountant.

Due to Hungarian legislation audit services are statutory for OTP Bank. Disclosure information about the auditor: Ernst & Young Audit Ltd. (001165), 1132 Budapest Váci Street 20. Registered under 01-09-267553 by Budapest-Capital Regional Court, as registry court. Statutory registered auditor: Zsolt Kónya, registration number: 007383.

Audit service fee agreed by the Annual General Meeting of the Bank for the year ended 2025 is an amount of EUR 458 thousand + VAT.

All other fees charged by the Auditor for non-audit services during the financial year are disclosed in the consolidated financial statements of the Bank.

In 1995, the shares of the Bank were introduced on the Budapest and the Luxembourg Stock Exchanges and were also traded on the SEAQ board on the London Stock Exchange and PORTAL in the USA.

The structure of the Share capital by shareholders (%):

	31 December 2025	31 December 2024
Domestic and foreign private and institutional investors	94.19%	96.77%
Employees	0.50%	0.51%
Treasury shares	5.15%	2.52%
Other	<u>0.16%</u>	<u>0.20%</u>
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

The Bank's Registered Capital consists of 280.000.010 pieces of ordinary shares with the nominal value of HUF 100 each, representing the same rights to the shareholders.

The Bank provides a full range of commercial banking services through a nationwide network of 301 branches in Hungary.

	31 December 2025	31 December 2024
Number of employees	10,671	10,679
Average number of employees	10,897	10,820

**NOTE 1: ORGANIZATION AND BASIS OF FINANCIAL STATEMENTS****1.2. Basis of accounting**

These Separate Financial Statements were prepared based on the assumption of the Management that the Bank will remain in business for the foreseeable future. The Bank will not be forced to halt operations and liquidate its assets in the near term at what may be very low fire-sale prices.

The Bank maintains its accounting records and prepares their statutory accounts in accordance with the commercial, banking and fiscal regulations prevailing in Hungary.

The presentation and functional currency of the Bank is the Hungarian Forint ("HUF").

The separate financial statements have been prepared in accordance with International Financial Reporting Standards ("IFRS") as adopted by the European Union ("EU").

**NOTE 1: ORGANIZATION AND BASIS OF FINANCIAL STATEMENTS [continued]****1.2.1. The effect of adopting new and revised IFRS standards effective from 1 January 2025**

The following amendments to the existing standards and new interpretation issued by the International Accounting Standards Board (IASB) and adopted by the EU are effective for the current reporting period:

- **IAS 21 The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability (Amendments)** - The amendments are effective for annual reporting periods beginning on or after January 1, 2025, with earlier application permitted.
  - The amendments specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. A currency is considered to be exchangeable into another currency when an entity is able to obtain the other currency within a time frame that allows for a normal administrative delay and through a market or exchange mechanism in which an exchange transaction would create enforceable rights and obligations. If a currency is not exchangeable into another currency, an entity is required to estimate the spot exchange rate at the measurement date. An entity's objective in estimating the spot exchange rate is to reflect the rate at which an orderly exchange transaction would take place at the measurement date between market participants under prevailing economic conditions. The amendments note that an entity can use an observable exchange rate without adjustment or another estimation technique.

The adoption of this amendment to the existing standard has not led to any material changes in these Separate Financial Statements.

**1.2.2. New and revised Standards and Interpretations issued by IASB and adopted by the EU but not yet effective**

- **IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures - Classification and Measurement of Financial Instruments (Amendments)** - The amendments are effective for annual reporting periods beginning on or after January 1, 2026. Early adoption of amendments related to the classification of financial assets and the related disclosures is permitted, with the option to apply the other amendments at a later date.
  - The amendments clarify that a financial liability is derecognised on the 'settlement date', when the obligation is discharged, cancelled, expired, or otherwise qualifies for derecognition. They introduce an accounting policy option to derecognise liabilities settled via electronic payment systems before the settlement date, subject to specific conditions. They also provide guidance on assessing the contractual cash flow characteristics of financial assets with environmental, social, and governance (ESG)-linked features or other similar contingent features. Additionally, they clarify the treatment of non-recourse assets and contractually linked instruments and require additional disclosures under IFRS 7 for financial assets and liabilities with contingent event references (including ESG-linked) and equity instruments classified at fair value through other comprehensive income.
- **IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures - Contracts Referencing Nature-dependent Electricity (Amendments)** - The amendments are effective for annual reporting periods beginning on or after January 1, 2026, with earlier application permitted.
  - The amendments include clarifying the application of the 'own-use' requirements, permitting hedge accounting if contracts in scope of the amendments are used as hedging instruments, and introduce new disclosure requirements to enable investors to understand the impact of these contracts on a company's financial performance and cash flows. The clarifications regarding the 'own-use' requirements must be applied retrospectively, but the guidance permitting hedge accounting have to be applied prospectively to new hedging relationships designated on or after the date of initial application.
- **Annual Improvements to IFRS Accounting Standards – Volume 11** - An entity shall apply those amendments for annual reporting periods beginning on or after January 1, 2026.
  - The IASB's annual improvements process deals with non-urgent, but necessary, clarifications and amendments to IFRS. In July 2024, the IASB issued Annual Improvements to IFRS Accounting Standards — Volume 11. The Annual Improvements to IFRS Accounting Standards - Volume 11, includes amendments to IFRS 1, IFRS 7, IFRS 9, IFRS 10, and IAS 7. These amendments aim to clarify wording, correct minor unintended consequences, oversights, or conflicts between requirements in the standards.

The Bank anticipates that the adoption of these new standards, amendments to the existing Standards and new interpretations will have no significant impact on the Separate Financial Statements of the Ban in the period of initial application.

**NOTE 1: ORGANIZATION AND BASIS OF FINANCIAL STATEMENTS [continued]****1.2.2. New and revised Standards and Interpretations issued by IASB and adopted by the EU but not yet effective [continued]**

- **IFRS 18 Presentation and Disclosure in Financial Statements** - IFRS 18 is effective for reporting periods beginning on or after January 1, 2027, with earlier application permitted. Retrospective application is required in both annual and interim financial statements.
  - IFRS 18 introduces new requirements on presentation within the statement of profit or loss. It requires an entity to classify all income and expenses within its statement of profit or loss into one of the five categories: operating; investing; financing; income taxes; and discontinued operations. These categories are complemented by the requirements to present subtotals and totals for 'operating profit or loss', 'profit or loss before financing and income taxes' and 'profit or loss'. It also requires disclosure of management-defined performance measures and includes new requirements for aggregation and disaggregation of financial information based on the identified 'roles' of the primary financial statements and the notes. In addition, there are consequential amendments to other accounting standards.

The Bank has initiated its IFRS 18 implementation project following the issuance of the new standard, which becomes effective for annual reporting periods beginning on or after 1 January 2027. Work is currently ongoing to assess and align internal reporting structures with the revised presentation and disclosure requirements, including the introduction of management-defined performance measures (MPMs). Based on the assessments performed to date, the Bank does not expect IFRS 18 to have a material impact on its statement of profit or loss, although the structure and presentation of certain line items may be updated to reflect the new categorisation and subtotals required by the standard. In particular, three items are expected to fall outside the operating profit category: profit from associates, profit on investment properties and operating leases and the expense on lease liabilities. In addition, the Bank is in the process of developing a new note to the financial statements that will present and explain its MPMs in accordance with IFRS 18.

**1.2.3. Standards and Interpretations issued by IASB but not yet adopted by the EU**

At present, IFRS as adopted by the EU do not significantly differ from regulations adopted by the IASB except for the following new standards, amendments to the existing standards and new interpretation, which were not endorsed for use in EU as at date of publication of these financial statements:

- **IFRS 19 Subsidiaries without Public Accountability: Disclosures (including the amendments)** - IFRS 19 (including the amendments) is effective for reporting periods beginning on or after January 1, 2027, with early application permitted.
  - IFRS 19 permits subsidiaries without public accountability to use reduced disclosure requirements if their parent company (either ultimate or intermediate) prepares publicly available consolidated financial statements in compliance with IFRS accounting standards. These subsidiaries must still apply the recognition, measurement and presentation requirements in other IFRS accounting standards. Unless otherwise specified, eligible entities that elect to apply IFRS 19 will not need to apply the disclosure requirements in other IFRS accounting standards. The amendments issued in August 2025 reduce the disclosure requirements of new IFRS accounting standards, which had been included in full when IFRS 19 was first issued.
- **Amendment in IFRS 10 Consolidated Financial Statements and IAS 28 Investments in Associates and Joint Ventures: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture** - In December 2015 the IASB postponed the effective date of this amendment indefinitely pending the outcome of its research project on the equity method of accounting.
  - The amendments address an acknowledged inconsistency between the requirements in IFRS 10 and those in IAS 28, in dealing with the sale or contribution of assets between an investor and its associate or joint venture. The main consequence of the amendments is that a full gain or loss is recognised when a transaction involves a business (whether it is housed in a subsidiary or not). A partial gain or loss is recognised when a transaction involves assets that do not constitute a business, even if these assets are housed in a subsidiary.

**NOTE 1: ORGANIZATION AND BASIS OF FINANCIAL STATEMENTS [continued]****1.2.3. Standards and Interpretations issued by IASB but not yet adopted by the EU [continued]**

- **IAS 21 The Effects of Changes in Foreign Exchange Rates: Translation to a Hyperinflationary Presentation Currency (Amendments)** - The amendments are effective for annual reporting periods beginning on or after January 1, 2027, with earlier application permitted.
  - The amendments require translation from a non-hyperinflationary functional currency into a hyperinflationary presentation currency at the closing rate. If an entity's functional currency is the currency of a non-hyperinflationary economy, but its presentation currency is the currency of a hyperinflationary economy, its results and financial position are translated into the presentation currency by translating all amounts (i.e., assets, liabilities, equity items, income and expenses) and all comparatives at the closing rate at the date of the most recent statement of financial position. An entity whose functional currency and presentation currency are the currency of a hyperinflationary economy, restates the comparative amounts of a foreign operation, whose functional currency is that of a non-hyperinflationary economy, by applying the general price index, to the foreign operation's comparative figures. The amendments also introduce certain additional disclosure requirements.

The Bank anticipates that the adoption of these new standards, amendments to the existing standards and new interpretations will have no material impact on the financial statements of the Bank in the period of initial application.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES**

Significant accounting policies applied in the preparation of the accompanying separate financial statements are summarized below:

**2.1. Basis of presentation**

These separate financial statements have been prepared under the historical cost convention with the exception of certain financial instruments, which are recorded at fair value. Revenues and expenses are recorded in the period in which they are earned or incurred. The Bank does not offset assets and liabilities or income and expenses unless it is required or permitted by an IFRS standard.

During the preparation of separate financial statements assets and liabilities, income and expenses are presented separately, except in certain cases, when one of the IFRS standards prescribes net presenting related to certain items. (See below 2.5.5.)

The presentation of separate financial statements in conformity with IFRS requires the Management of the Bank to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities as at the date of the financial statements and their reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Future changes in economic conditions, business strategies, regulatory requirements, accounting rules and other factors could result in a change in estimates that could have a material impact on future separate financial statements.

**2.2. Foreign currency translation**

Monetary assets and liabilities denominated in foreign currencies are translated into HUF that is the presentation currency, at exchange rates quoted by the National Bank of Hungary ("NBH") as at the date of the separate financial statements. Income and expenses arising in foreign currencies are converted at the rate of exchange on the transaction date. Resulting foreign exchange gains or losses are recorded to the separate statement of profit or loss.

**2.3. Consolidated financial statements**

These financial statements present the separate financial position and results of operations of the Bank. Consolidated financial statements are prepared by the Bank and consolidated net profit for the year and shareholders' equity differs significantly from that presented in these separate financial statements. See Note 2.4 for the description of the method of accounting for investments in subsidiaries and associated companies in these separate financial statements. The consolidated financial statements and the separate financial statements will be published on the same date.

**2.4. Investments in subsidiaries, associated companies and other investments**

Investments in subsidiaries comprise those investments where OTP Bank, through direct and indirect ownership interest, controls the investee. Control is achieved when the Bank has power over the investee, is exposed or has rights, to variable returns from its involvement with the investee and has the ability to use its power to affect its returns.

Investments in subsidiaries are recorded at the cost of acquisition, less impairment for permanent diminution in value, when appropriate. After initial measurement investments in subsidiaries are measured at cost, in the case of foreign currency denominated investments for the measurement the Bank uses the exchange rate at the date of transaction.

Impairment is determined based on the future economic benefits of the subsidiary and macroeconomic factors.

OTP Bank calculates the fair value based on discounted cash flow model. The 3 year period explicit cash flow model serves as a basis for the impairment test by which the Bank defines the impairment need on investment in subsidiaries based on the strategic factors and financial data of its cash-generating units.

OTP Bank in its strategic plan has taken into consideration the cautious recovery of global economic situation and outlook, the associated risks and their possible effect on the financial sector as well as the current and expected availability of wholesale funding.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets****2.5.1. Business model and SPPI test**

A business model refers how the Bank manages its financial instruments in order to generate cash flows. It is determined at a level that reflects how groups of financial instruments are managed rather than at an instrument level.

The financial assets held by the Bank are classified into three categories depending on the business model within the financial assets are managed.

- Business model whose objective is to hold financial assets in order to collect contractual cash flows. Some sales can be consistent with hold to collect business model and the Bank assesses the nature, frequency and significance of any sales occurring. The Bank does not consider the sale frequent when at least six months have elapsed between sales. The significant sales are those when the sales exceed 2% of the total hold to collect portfolio. Within this business model the Bank manages mainly loans and advances and long term securities and other financial assets.
- Business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Within this business model the Bank only manages securities.
- Business model whose objective is to achieve gains in a short term period. Within this business model the Bank manages securities and derivative financial instrument.

If cash flows are realised in a way that is different from the expectations at the date that the Bank assessed the business model, that does not give rise to a prior error in the Bank's financial statements nor does it change the classification of the remaining financial assets held in that business model.

When, and only when the Bank changes its business model for managing financial assets it reclassifies all affected assets. Such changes are determined by the Bank's senior management as a result of external or internal changes and must be significant to the Bank's operations and demonstrable to external parties. The Bank shall not reclassify any financial liability.

Classification of a financial asset is based on the characteristics of its contractual cash flows if the financial asset is held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets.

The Bank should determine whether the asset's contractual cash flows are solely payments of principal and interest on the principal amount outstanding (SPPI test). Contractual cash flows that are solely payments of principal and interest on the principal amount outstanding are consistent with a basic lending arrangement.

Contractual terms that introduce exposure to risks or volatility in the contractual cash flows that is unrelated to a basic lending arrangement, such as exposure to changes in equity prices or commodity prices, do not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding. The Bank assesses whether contractual cash flows are solely payments of principal and interest on the principal amount outstanding for the currency in which the financial asset is denominated.

Time value of money is the element of interest that provides consideration for only the passage of time. However, in some cases, the time value of money element may be modified. In such cases, the Bank assesses the modification to determine whether the contractual cash flows represent solely payments of principal and interest on the principal amount outstanding.

When assessing a modified time value of money element, the objective is to determine how different the undiscounted contractual cash flows could be from undiscounted cash flows that would arise if the time value of money element was not modified (the benchmark cash flows). The benchmark instrument can be an actual or a hypothetical financial asset. If the undiscounted contractual cash flows significantly – above 2% – differ from the undiscounted benchmark cash flows, the financial asset should be subsequently measured at fair value through profit or loss.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5.2. Securities at amortised cost**

The Bank measures at amortized cost those securities which are held for contractual cash collecting purposes, and contractual terms of these securities give rise to cash flows that are solely payment of principal and interest on the principal amount outstanding. The Bank initially recognises these securities at fair value. Securities at amortised cost are subsequently measured using the effective interest (EIR) method and are subject to impairment. The amortisation of any discount or premium on the acquisition of a security at amortized cost is part of the amortized cost and is recognised as interest income so that the revenue recognized in each period represents a constant yield on the investment. Securities at amortized cost are accounted for on a trade date basis. Such securities comprise mainly securities issued by the Hungarian Government bonds and corporate bonds.

**2.5.3. Financial assets at fair value through profit or loss****2.5.3.1. Securities held for trading**

Investments in securities are accounted for on a trade date basis and are initially measured at fair value. Securities held for trading are measured at subsequent reporting dates at fair value. Unrealised gains and losses on held for trading securities are recognized in profit or loss and are included in the separate statement of profit or loss for the period. The Bank holds held for trading securities within the business model to obtain short-term gains, consequently realised and unrealised gains and losses are recognized in the net operating income, while interest income is recognised in income similar to interest income. The Bank applies FIFO<sup>1</sup> inventory valuation method for securities held for trading. Such securities consist of discounted and interest bearing Treasury bills, Hungarian Government bonds, mortgage bonds, shares in non-financial commercial companies, shares in investment funds, shares in venture capital funds and shares in financial institutions.

**2.5.3.2. Derivative financial instruments**

In the normal course of business, the Bank is a party to contracts for derivative financial instruments, which represent a low initial investment compared to the notional value of the contract and their value depends on value of underlying asset and are settled in the future. The derivative financial instruments used include interest rate forward or swap agreements and currency forward or swap agreements and options. These financial instruments are used by the Bank both for trading purposes and to hedge interest rate risk and currency exposures associated with its transactions in the financial markets. (It is the so-called economic hedge, accounting hedge is described later.)

Derivative financial instruments are accounted for on a trade date basis and are initially measured at fair value and at subsequent reporting dates also at fair value. Fair values are obtained from quoted market prices, discounted cash flow models and option pricing models as appropriate. OTP Bank adopts multi curve valuation approach for calculating the net present value of future cash flows – based on different curves used for determining forward rates and used for discounting purposes. It shows the best estimation of such derivative deals that are collateralised as OTP Bank has almost its entire open derivative transactions collateralised. Changes in the fair value of derivative financial instruments that do not qualify for hedge accounting are recognized in profit or loss and are included in the separate statement of profit or loss for the period. Each derivative deal is determined as asset when fair value is positive and as liability when fair value is negative.

Certain derivative transactions, while providing effective economic hedges under risk management positions of the Bank, do not qualify for hedge accounting under the specific rules of IFRS 9 and are therefore treated as derivatives held for trading with fair value gains and losses charged directly to the separate statement of profit or loss.

***Foreign currency contracts***

Foreign currency contracts are agreements to exchange specific amounts of currencies at a specified rate of exchange, at a spot date (settlement occurs two days after the trade date) or at a forward date (settlement occurs more than two days after the trade date). The notional amount of forward contracts does not represent the actual market or credit risk associated with these contracts.

Foreign currency contracts are used by the Bank for risk management and trading purposes. The Bank's risk management foreign currency contracts were used to hedge the exchange rate fluctuations of loans and deposits denominated in foreign currency.

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<sup>1</sup> First In First Out

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5.3.2. Derivative financial instruments [continued]*****Foreign exchange swaps and interest rate swaps***

The Bank enters into foreign-exchange swap and interest rate swap (“IRS”) transactions. The swap transaction is a complex agreement concerning the swap of certain financial instruments, which usually consists of a spot and one or more forward contracts.

Interest rate swaps obligate two parties to exchange one or more payments calculated with reference to fixed or periodically reset rates of interest applied to a specific notional principal amount (the base of the interest calculation). Notional principal is the amount upon which interest rates are applied to determine the payment streams under interest rate swaps.

Such notional principal amounts are often used to express the volume of these transactions but are not actually exchanged between the counterparties. The Bank’s interest rate swap contracts can be hedging or held for trading contracts.

***Cross-currency interest rate swaps***

The Bank enters into cross-currency interest rate swap (“CCIRS”) transactions which have special attributes, i.e. the parties exchange the notional amount at the beginning and also at the maturity of the transaction. A special type of these deals is the mark-to-market CCIRS agreements. At this kind of deals the parties – in accordance with the foreign exchange prices – revalue the notional amount during lifetime of the transaction.

***Equity and commodity swaps***

Equity swaps obligate two parties to exchange more payments calculated with reference periodically reset rates of interest and performance of indices. A specific notional principal amount is the base of the interest calculation. The payment of index return is calculated on the basis of current market price compared to the previous market price. In case of commodity swaps payments are calculated on the basis of the strike price of a predefined commodity compared to its average market price in a period.

***Forward rate agreements (“FRA”)***

A forward rate agreement is an agreement to settle amounts at a specified future date based on the difference between an interest rate index and an agreed upon fixed rate. Market risk arises from changes in the market value of contractual positions caused by movements in interest rates.

The Bank limits its exposure to market risk by entering into generally matching or offsetting positions and by establishing and monitoring limits on unmatched positions. Credit risk is managed through approval procedures that establish specific limits for individual counter-parties. The Bank’s forward rate agreements were transacted for management of interest rate exposures.

***Foreign exchange options***

A foreign exchange option is a derivative financial instrument that gives the owner the right to exchange money denominated in one currency into another currency at a pre-agreed exchange rate at a specified future date. The transaction, for a fee, guarantees a worst-case exchange rate for the futures purchase of one currency for another. These options protect against unfavourable currency movements while preserving the ability to participate in favourable movements.

**2.5.4. Hedge accounting**

The Bank implemented hedge accounting rules for micro hedge transactions prescribed by IFRS 9 in 2018.

The Bank elected – as an accounting policy choice permitted under IFRS 9 – to apply IAS 39 hedge accounting rules for portfolio (macro) hedge transactions.

For further details please see Note 45.3

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5.4. Hedge accounting [continued]****2.5.4.1. Derivative financial instruments designated as fair value****Micro hedge transactions**

The Bank elected to apply IFRS 9 for the micro hedge transactions.

Changes in the fair value of derivatives that are designated and qualify as hedging instruments fair value hedges and that prove to be highly effective in relation to the hedged risk, are recorded in the separate statement of profit or loss along with the corresponding change in fair value of the hedged asset or liability that is attributable to the specific hedged risk. Changes in the fair value of the hedging instrument in fair value hedges are charged directly to the separate statement of profit or loss. The conditions of hedge accounting applied by the Bank are the following: formally designated as hedging relationship, proper hedge documentation is prepared, effectiveness test is performed and based on it the hedge is qualified as effective.

In the case of a financial instrument measured at amortised cost the Bank recognises the hedging gain or loss on the hedged item as the modification of its carrying amount and it is recognised in profit or loss. These adjustments of the carrying amount are amortised to the profit or loss using the effective interest rate method. The Bank starts the amortisation when the hedged item is no longer adjusted by the hedging gains or losses. If the hedged item is derecognised, the Bank recognises the unamortised fair value in profit or loss immediately. For the fair value hedges inefficiencies and the net revaluation of hedged and hedging item are recognised in the Net result on derivative instruments and hedge relationships.

**Macro (portfolio) hedge transactions**

The Bank elected, as a policy choice permitted under IFRS 9, to continue to apply hedge accounting in accordance with IAS 39 in the case of macro hedge transactions.

The Bank applies macro fair value hedging to its core part sight deposit to mitigate the interest rate risk arising from the interest rate mismatch of assets with floating behaviour and the fixed rate nature of the deposit. The nature of the hedged risk is interest rate risk arising from the fixed nature and the term structure of the interest rate risk characteristics of the hedged core sight deposits.

The hedging instruments are fixed-to-floater interest rate swaps measured at fair value through profit or loss designated in a proportion defined as the declared hedging ratio.

The hedging gain or loss is recognized in accordance with IAS39 paragraph 89 and 90.

The gain or loss on the hedging instrument is recognized in profit or loss, the fair value adjustment attributable to the hedged risk is presented on a separate line in the separate statement of financial position.

The assessment of hedge effectiveness is measured on a monthly basis. The hedging relationship is considered appropriate if the difference of fair value change of the hedging instrument and the hedged item is between the 80% -125% range in the case of all or all but one valid stress scenarios.

The aggregated fair value changes on the hedged assets are recognised on the Derivative financial asset / liability designated as hedge accounting in the Separate Statement of Financial Position.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5.4. Hedge accounting [continued]****2.5.4.2. Derivative financial instruments designated as cash flow hedge**

Changes in fair value of derivatives that are designated and qualify as hedging instrument in cash flow hedges and that prove to be highly effective in relation to hedged risk are recognized as reserve in other comprehensive income. Amounts deferred in other comprehensive income are transferred to the separate statement of profit or loss and classified as revenue or expense in the periods during which the hedged assets and liabilities effect the separate statement of recognized and comprehensive income for the period. The ineffective element of the hedge is charged directly to the separate statement of profit or loss. The Bank terminates the hedge accounting if the hedging instrument expires or is sold, terminated, or exercised, or the hedge no longer meets the criteria for hedge accounting. In case of cash flow hedges - in line with the standard – hedge accounting is still applied as long as the underlying asset is derecognised or terminated.

When the Bank discontinues hedge accounting to a cash-flow hedge the amount in the cash flow hedge reserve is reclassified to the profit or loss if the hedged future cash flows are no longer expected to occur. If the hedged future cash flows are still expected to occur, the amount remains in the cashflow hedge reserve and reclassified to the profit and loss only when the future cash flows occur.

**2.5.5. Offsetting**

Financial assets and liabilities may be offset and the net amount is reported in the statement of financial position when the Bank has a legally enforceable right to set off the recognised amounts and the transactions are intended to be reported in the statement of financial position on a net basis. In the case of the derivative financial instruments the Bank applies offsetting and net presentation in the Statement of Financial Position when the Bank has the right and the ability to settle the assets and liabilities on a net basis.

**2.5.6. Embedded derivatives**

Sometimes, a derivative may be a component of a combined or hybrid contract that includes a host contract and a derivative (the embedded derivative) affecting cash flows or otherwise modifying the characteristics of the host instrument. An embedded derivative must be separated from the host instrument and accounted for as a separate derivative if, and only if:

- The economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host contract;
- A separate financial instrument with the same terms as the embedded derivative would meet the definition of a derivative as a stand-alone instrument; and
- The host instrument is not measured at fair or is measured at fair value but changes in fair value are recognised in other comprehensive income.

As long as a hybrid contract contains a host that is a financial asset the general accounting rules for classification, recognition and measurement of financial assets are applicable for the whole contract and no embedded derivative is separated.

Derivatives that are required to be separated are measured at fair value at initial recognition and subsequently. If the Bank is unable to measure the embedded derivative separately either at acquisition or at the end of a subsequent financial reporting period, the Group shall designate the entire hybrid contract as at fair value through profit or loss. The Bank shall assess whether an embedded derivative is required to be separated from the host contract and accounted for as a derivative when the Bank first becomes a party to the contract.

The separation rules for embedded derivatives are only relevant for financial liabilities.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5.7. Securities at fair value through other comprehensive income (“FVOCI securities”)**

FVOCI securities are held within a business model whose objective is achieved by both collecting of contractual cash flows and selling securities. Furthermore contractual terms of FVOCI securities give rise on specified dates to cash flows that are solely payment of principal and interest on the principal amount outstanding.

**Debt instruments**

Investments in debt securities are accounted for on a trade date basis and are initially measured at fair value. Securities at fair value through other comprehensive income are measured at subsequent reporting dates at fair value. Unrealised gains and losses on FVOCI financial instruments are recognized in other comprehensive income, except for interest and foreign exchange gains/losses on monetary items, unless such FVOCI security is part of an effective hedge. Such gains and losses will be reported when realised in profit or loss for the applicable period. The Bank applies FIFO<sup>2</sup> inventory valuation method for FVOCI securities.

For debt securities at fair value through other comprehensive income the loss allowance is calculated based on expected credit loss model. The expected credit loss is accounted for against Other Comprehensive Income.

FVOCI securities are remeasured at fair value based on quoted prices or values derived from cash flow models. In circumstances where the quoted market prices are not readily available, the fair value of debt securities is estimated using the present value of the future cash flows and the fair value of any unquoted equity instruments are calculated using the EPS ratio.

**Fair value through other comprehensive income option for equity instruments**

In some cases the Bank made an irrevocable election at initial recognition for certain non-trading investments in an equity instrument to present subsequent changes in fair value of these securities in other comprehensive income instead of in profit or loss.

The use of the fair value option is based only on direct decision of management of the Bank.

FVOCI securities are held within a business model whose objective is achieved by both collecting of contractual cash flows and selling securities. Furthermore contractual terms of FVOCI securities give rise on specified dates to cash flows that are solely payment of principal and interest on the principal amount outstanding.

**2.5.8. Loans, placements with other banks, repo receivables and loss allowance for loan, placements and repo receivables losses**

The Bank measures Loans, placements with other banks and repo receivables at amortised cost, which are held to collect contractual cash flows, and contractual terms of these assets give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. The Bank recognises loans, which are not held for trading and do not give rise contractual cash flows that are solely payments of principal and interest on the principal amount outstanding as loans measured at fair value through profit or loss (“FVTPL loans”).

Loans, placements with other banks and repo receivables are accounted at amortised cost, stated at the principal amounts outstanding including accrued interest, net of allowance for loan or placement losses, respectively.

In case of the above mentioned financial assets measured at amortised cost transaction fees and charges adjust the carrying amount at initial recognition and are included in effective interest calculation. In case of FVTPL loans fees and charges are recognised when incurred in the separate statement of profit or loss.

Loans, placements with other banks and repo receivables loans are derecognised when the contractual rights to the cash flows expire or they are transferred. When a financial asset is derecognised the difference of the carrying amount and the consideration received is recognised in the profit or loss. In case of the above mentioned financial assets at amortised cost gains or losses from derecognition are presented in “Gains/losses arising from derecognition of financial assets at amortised cost” line. In case of FVTPL loans gains or losses from derecognition are presented in “Net operating income”.

Change in the fair value of FVTPL loans is broken down into two components and presented in the separate statement of profit or loss as follows:

- Portion of the change in fair value arising from changes in credit risk are presented within “Risk cost” as “Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit or loss”.
- The remaining component of the change is presented in fair value within “Net operating income” as “Gains/(Losses) on financial instruments at fair value through profit or loss”.

<sup>2</sup> First In First Out

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5.8. Loans, placements with other banks, repo receivables and loss allowance for loan, placements and repo receivables losses [continued]**

Initially, financial assets shall be recognised at fair value which is usually equal to the transaction value in case of loans and placements. However, when the amounts are not equal, the initial fair value difference should be recognized.

If the fair value of financial assets is based on a valuation technique using only inputs observable in market transactions, the Bank recognises the initial fair value difference in the Separate Statement of Profit or Loss.

When the fair value of financial assets is based on models for which inputs are not observable, the difference between the transaction price and the fair value is deferred and only recognised in profit or loss when the instrument is derecognised or the inputs became observable.

Initial fair value of loans lent at interest below market conditions is lower than their transaction price, the subsequent measurement of these loans is under IFRS 9.

Allowance for losses on loans, placements with other banks and repo receivables represent management assessment for potential losses in relation to these activities.

The Bank recognises a loss allowance for expected credit losses on a financial asset at each reporting date. The loss allowance for a financial asset equals to 12-month expected credit loss or equals to the lifetime expected credit losses. The maximum period over which expected credit losses shall be measured is the maximum contractual period over which the Bank is exposed to credit risk.

If the credit risk on a financial asset has not increased significantly since initial recognition then 12-month expected credit losses, otherwise (in case of significant credit risk increase) lifetime expected credit losses should be calculated. The expected credit loss is the present value of the difference between the contractual cash flows that are due to the Bank under the contract and the cash flows that the Bank expects to receive.

When the contractual cash flows of a financial asset are modified and the modification does not result in the derecognition of the financial asset the Bank recalculate the gross carrying amount of the financial asset by discounting the expected future cash flows with the original effective interest rate of the asset. The difference between the carrying amount and the present value of the expected cash flows is recognised as a “Modification gain or loss” in the statement of profit or loss. Interest income and amortised cost are accounted for using the effective interest rate method.

Write-offs are generally recorded after all reasonable restructuring or collection activities have taken place and the possibility of further recovery is considered to be remote. The loan is written off against the related account “Loss allowance on loan, placement and repo receivables losses” in the Statement of Profit or loss.

OTP Bank applies partial or full write-off for loans based on the definitions and prescriptions of financial instruments in accordance with IFRS 9. If OTP Bank has no reasonable expectations regarding a financial asset (loan) to be recovered, it will be written off partially or fully at the time of emergence.

The gross amount and loss allowance of the loans shall be written off in the same amount to the estimated maximum recovery amount while the net carrying value remains unchanged.

If there are reasonable expectations of recovery for a financial asset that is written-off fully or partially, OTP Bank shall re-estimate cash flows of that financial asset and write-off reversal is applied in the financial statements.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5.9. Modification of contractual cash flows**

If the net present value of the contracted cash flows changes due to the modification of the contractual terms and it is not qualified as derecognition, modification gain or loss should be calculated and accounted for in the separate statement of profit or loss. Modification gain or loss is accounted in cases like restructuring – as defined in internal policies of the Bank – prolongation, renewal with unchanged terms, renewal with shorter terms and prescribing capital repayment rate, if it doesn't exist or has not been earlier.

The changes of net present value should be calculated on portfolio level in case of retail exposures. Each retail contract is restructured based on restructuring frameworks. The Bank has to evaluate these frameworks (and not individual contracts). The changes of net present value should be calculated individually on contract level in case of corporate portfolio.

Among the possible contract amendments, the Group considers as a derecognition and a new recognition the followings:

- merging several debts into a single debt, or one single debt splitting into several tranches,
- change of currency,
- change in counterparty,
- failing SPPI test after modification,
- interest rate change (fixed to floating or floating to fixed),

when the discounted present value – discounted at the original effective interest rate – of the cash flows under the new terms is at least 10 per cent different from the discounted present value of the remaining cash flows.

In case of derecognition and new recognition of a financial asset, the unamortized fees of the derecognized asset should be presented as Income similar to interest income. The newly recognized financial asset is initially measured at fair value and is placed in stage 1 if the derecognized financial asset was in stage 1 or stage 2 portfolio. The newly recognized financial asset will be purchased or originated credit impaired financial asset ("POCI") if the derecognized financial asset was in stage 3 portfolio or it was POCI.

The modification gain or loss shall be calculated at each contract amendments unless they are handled as a derecognition and new recognition. In case of modification the Bank recalculates the gross carrying amount of the financial asset. To do this, the new contractual cash flows should be discounted using the financial asset's original effective interest rate (or credit-adjusted effective interest rate for POCI financial asset). Any costs or fees incurred adjust the carrying amount of the modified financial asset are amortized over the remaining term of the modified financial asset.

**2.5.10. Purchased or originated credit impaired financial assets**

Purchased or originated financial assets are credit-impaired on initial recognition. A financial asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that financial asset have occurred.

A purchased credit-impaired asset is likely to be acquired at a deep discount. In unusual circumstances, it may be possible that an entity originates a credit-impaired asset, for example, following a substantial modification of a distressed financial asset that resulted in the derecognition of the original financial asset.

In the case of POCI financial assets, interest income is always recognized by applying the credit-adjusted effective interest rate.

For POCI financial assets, in subsequent reporting periods an entity is required to recognize:

- the cumulative changes in lifetime expected credit losses since initial recognition as a loss allowance,
- the impairment gain or loss which is the amount of any change in lifetime expected credit losses.

An impairment gain is recognized (with the parallel increase of the net amortized cost of receivable) if due to the favourable changes after initial recognition the lifetime expected credit loss estimation is becoming lower than the original estimated credit losses at initial recognition.

The POCI qualification remains from initial recognition to derecognition in the Bank's books.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.6. Loss allowance**

Loss Allowance for loans and placements with other banks and repo receivables are recognised by the Bank based on the expected credit loss model in accordance with IFRS 9. Based on the three stage model loss allowance is recognised in amount of 12 month expected credit loss from the initial recognition. Financial assets with significantly increased credit risk or credit impaired financial assets (based on objective evidences) loss allowance is recognised in amount of lifetime expected credit loss.

In case of purchased or originated credit impaired financial assets loss allowance is recognised in amount of lifetime expected credit loss since initial recognition. Impairment gain is recognised if lifetime expected credit loss for purchased or originated credit impaired financial assets at measurement date are less than the estimated credit loss at initial recognition.

A loss allowance for loans and placements with other banks and repo receivables represents Management's assessment for potential losses in relation to these activities.

The default occurs when either or both of the following events have taken place:

- objective criterion meaning that the credit obligation of the client is overdue exceeding the materiality threshold for more than 90 consecutive days (90+ default DPD), or the obligor has breached the limit of the overdraft with an amount exceeding the materiality threshold for more than 90 consecutive days (90+ default DPD), or
- probability criterion meaning the probability that the obligor will be unable to pay its credit obligations in full (UTP= Unlikely to Pay). The following conditions indicate the occurrence of the probability criterion: specific credit risk adjustment, sell of credit obligation with significant loss, distressed restructuring, termination of the contract on the initiative of the Bank, Bankruptcy, liquidation, personal bankruptcy, forced deleted status.

Previously described conditions should result in default status mandatorily. Moreover, during the individual expert-based assessment the client's default status shall be established if in the specific case the default can be justified on subjective basis. The default status should be terminated if in the last 3 months no other default criterion exists and the condition (either probability criterion or objective criterion) that resulted in the default status ceased at least 3 months ago.

The expected loss calculation should be forward looking. Available forward-looking information has to be included in the parameter estimation by using different scenarios, including forecasts of future economic conditions. The determination of probability-weighted forward-looking scenarios are based on the OTP Group' macro model. In general, there are two crisis scenarios (4-5), and three non-crisis scenarios (1-3) but the calculation of impairment should be based on at least two scenarios in the OTP Group. The macro conditioning is performed by Vasicek-model, which captures the relationship between point-in-time (PiT) and through-the-cycle (TTC) PD.

The Vasicek PD transformation can also be used to estimate the PIT PDs of the buckets. The required parameters (such as correlation coefficient and macro condition parameter) can be derived from the OTP's macro model.

In the collective provisioning methodology credit risk and the change of credit risk can be correctly captured by understanding the risk characteristics of the portfolio. At portfolio segmentation, setting the segments is a key element of the provisioning calculation and requires the extensive knowledge of the portfolio. The segmentation is expected to stay stable from month to month. The segmentation must be performed separately for each parameter, since in each case different factors may have relevance.

The estimation of one-year and lifetime probability of default (PD) of collectively assessed exposures is performed via transition matrices. The assets should be allocated to groups representing similar credit risk based on major credit risk characteristics and their capability to fulfil contractual obligations. The mandatory variables of the group level assessment procedure are payment delay, deal/client rating, the restructured flag, the default status and product type. Further segmentation is advisable in case significant differences are observed in probability of default. Transition matrices should be determined for each portfolio segment separately. The Group model handles healing (from default) rate in the PD parameter, thus the calculated probabilities should be reduced by this rate.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.6. Loss allowance [continued]**

Two different methods are applied in OTP Group for LGD parameter calculation: Retail mortgage loans and non-retail portfolios (MSE and Wholesale) that are significantly secured by mortgage: modified LGD methodology based on the Asset Quality Review (AQR) – the primary source of the recovery the collateral itself but cash recovery is also taken into account. The calculation is performed for each exposure individually based on the estimated parameters (main parameters: FSR – foreclosure success rate, SR – sales ratio, TTS – time to sale, C – cost, REC – cash recovery) and the actual value of collaterals (e.g. property, guarantee, surety, bail).

For Consumer loans and car finance: recovery based LGD methodology estimated from historical recoveries. The LGD calculation should not be automatically identified with historic actual data. The direction and degree of the shift in the factors impacting the LGD, also considering the macroeconomic effects, in addition to the anticipated developments in those, must always be analysed. The LGD – just like the PD – is not independent of the business cycles either; typically it increases in parallel with the economic downturn.

Loss allowance for loan and placements are determined at a level that provides coverage for individually identified credit losses. Collective impairment loss is recognised for loans with similar credit risk characteristics when it is not possible to determine the amount of the individually identified credit loss in the absence of objective evidence. The expected cash flows for loan portfolios are estimated based on historical loss experience.

At subsequent measurement the Bank recognises through “Loss allowance on loan, placement and repo receivables losses” in the Statement of Profit or Loss impairment gain or loss as an amount of expected credit losses or reversal that is required to adjust the loss allowance at the reporting date to the amount that is required to be recognised in accordance with IFRS 9.

If a financial asset, which previously classified in the first stage, classified subsequently in the second or third stage than loss allowance is adjusted to lifetime expected credit loss. If a financial asset, which previously classified in the second or third stages, classified subsequently in the first stage than loss allowance is adjusted to level of 12 month expected credit loss.

**Classification into risk classes**

According to the requirements of the IFRS9 standard, the Bank classifies financial assets measured at amortised cost and fair value through other comprehensive income, and loan commitments and financial guarantees into the following categories in accordance with IFRS9:

Stage 1	Performing
Stage 2	Performing, but compared to the initial recognition it shows significant increase in credit risk
Stage 3	Non-performing
POCI	Purchased or originated credit impaired

In the case of trade receivables, contract assets and lease receivables the Group applies the simplified approach and calculates only lifetime expected credit loss. Simplified approach is the following:

- for the past 3 years the average annual balance of receivables under simplified approach is calculated,
- the written-off receivables under simplified approach are determined in the past 3 years,
- the loss allowance ratio will be the sum of the written-off amounts divided by the sum of the average balances,
- historical losses are adjusted to reflect information about current conditions and reasonable forecasts of future economic conditions,
- the loss allowance is multiplied by the end-of-year balance and it will be the actual loss allowance on these receivables,
- loss allowance should be recalculated annually.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****Classification into risk classes [continued]**

The Bank assumes that the credit risk on a financial instrument has not increased significantly since initial recognition if the financial asset is determined to have low credit risk at the reporting date. This might occur if the financial asset has a low risk of default, the borrower has a strong capacity to meet its contractual cash flow obligations in the near term and adverse changes in economic and business conditions in the longer term may, but will not necessarily, reduce the ability of the borrower to fulfil its contractual cash flow obligations. The Bank considers sovereign exposures having low credit risk.

Stage 1: financial instruments for which the events and conditions specified in respect of Stage 2 and Stage 3 do not exist on the reporting date.

A financial instrument shows significant increase in credit risk, and is allocated to Stage 2, if in respect of which any of the following triggers exist on the reporting date, without fulfilling any of the conditions for the allocation to the non-performing stage (stage 3):

- the payment delay exceeds 30 days,
- it is classified as performing forborne,
- based on individual decision, its currency suffered a significant "shock" since the disbursement of the loan,
- the transaction/client rating exceeds a predefined value or falls into a determined range, or compared to the historic value it deteriorates to a predefined degree,
- in the case retail mortgage loans, the loan-to-value ratio exceeds a predefined rate,
- default on another loan of the retail client, if no cross-default exists,
- monitoring classification of corporate and municipal clients above different thresholds defined on group
  - financial difficulties at the debtor (capital adequacy, liquidity, deterioration of the instrument quality),
  - significant decrease of the liquidity or the activity on the active market of the financial instrument can be observed,
  - the rating of the client reflects high risk, but it is better than the default one,
  - significantly decrease in the value of the recovery from which the debtor would disburse the loan,
  - clients under liquidation.

A financial instrument is non-performing and it is allocated to Stage 3 when any of the following events or conditions exists on the reporting date:

- default (based on the group level default definition),
- classified as non-performing forborne (based on the group level forborne definition),
- the monitoring classification of corporate and municipal clients above different thresholds defined on group level (including but not limited to):
  - breaching of contracts,
  - significant financial difficulties of the debtor (like capital adequacy, liquidity, deterioration of the instrument quality),
  - bankruptcy, liquidation, debt settlement processes against debtor,
  - forced strike-off started against debtor,
  - termination of loan contract by the Bank,
  - occurrence of fraud event,
  - termination of the active market of the financial instrument.

If the exposure is no longer considered as credit impaired, the Bank allocates this exposure to Stage 2.

When loss allowance is calculated at exposures categorized into stages the following process is needed by stages:

- Stage 1 (performing): loss allowance at an amount equal to 12-month expected credit loss should be recognized,
- Stage 2 (significant increase in credit risk): loss allowance at an amount equal to lifetime expected credit loss should be recognized,
- Stage 3 (non-performing): loss allowance at an amount equal to lifetime expected credit loss should be recognized.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****Classification into risk classes [continued]**

For lifetime expected credit losses, the Bank shall estimate the risk of a default occurring on the financial instrument during its expected life. 12-month expected credit losses are a portion of the lifetime expected credit losses and represent cash flow shortfalls that will result if a default occurs in the 12 months after the reporting date (or a shorter period if the expected life of the financial instrument is less than 12 months), weighted by the probability of that default occurring.

An entity shall measure expected credit losses of a financial instrument in a way that reflects:

- an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes,
- the time value of money, and

reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

**2.7. Option to designate a financial asset/liability measured at fair value through profit or loss (FVTPL option)**

The Bank may, at initial recognition, irrevocably designate a financial asset or liability as measured at fair value through profit or loss. The Bank may use FVTPL option in the following cases:

- if doing so eliminates or significantly reduces a measurement or recognition inconsistency (accounting mismatch) that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases
- if the group of financial liabilities or assets is managed and its performance is evaluated on a fair value basis, in accordance with a documented risk management or investment strategy, and information about the group is provided internally on that basis to the Bank's key management personnel.

The use of the fair value option is limited only to special situations, and it can be based only on direct decision of management of the Bank.

**2.8. Sale and repurchase agreements, security lending**

Where debt or equity securities are sold under a commitment to repurchase them at a pre-determined price, they remain on the statement of financial position and the consideration received is recorded in Other liabilities or Amounts due to banks and deposits from the National Bank of Hungary and other banks, or Deposits from customers. Conversely, debt or equity securities purchased under a commitment to resell are not recognized in the statement of financial position and the consideration paid is recorded either in Placements with other banks or Deposits from customers. Interest is accrued evenly over the life of the repurchase agreement. In the case of security lending transactions the Bank does not recognize or derecognize the securities because it is believed that the transferor retains substantially all the risks and rewards of the ownership of the securities. Only a financial liability or financial receivable is recognized for the consideration amount.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.9. Property, equipment and intangible assets**

Property, equipment and intangible assets are stated at cost, less accumulated depreciation and amortization and impairment, if any. The depreciable amount (book value less residual value) of the non-current assets must be allocated over their useful lives. Depreciation and amortization are calculated using the straight-line method over the estimated useful lives of the assets based on the following annual percentages:

	Depreciation key	Useful lifetime (years)
Intangible assets		
Software	20%-33%	3-5
Property rights	17%-50%	2-6
Property	1%-7%	15-100
Office equipment and vehicles	7%-50%	2-15

Depreciation and amortization on properties, equipment and intangible assets starts on the day when such assets are placed into service. At each balance sheet date, the Bank reviews the carrying value of its tangible and intangible assets to determine if there is any indication that those assets have suffered an impairment loss.

If such indication exists, the recoverable amount of the asset is estimated to determine the extent (if any) of the impairment loss. Where it is not possible to estimate the recoverable amount of an individual asset, the Bank estimates the recoverable amount of the cash-generating unit to which the asset belongs.

Where the carrying value of property, equipment, other tangible fixed assets and intangible assets is greater than the estimated recoverable amount, it is impaired immediately to the estimated recoverable amount.

**2.10. Inventories**

The inventories shall be measured at the lower of cost and net realisable value. The cost of inventories shall comprise all costs of purchase, costs of conversion and other costs incurred in bringing the inventories to their present location and condition. The Bank uses generally FIFO formulas to the measurement of inventories. Inventories shall be removed from books when they are sold, unusable or destroyed. When inventories are sold, the carrying amount of those inventories shall be recognized as an expense in the period in which the related revenue is recognized. Repossessed assets are classified as inventories. The Bank's policy is to sell repossessed assets and not to use them for its internal operations.

**2.11. Investment properties**

Investment properties of the Bank are land, buildings, part of buildings which are held (as the owner or as the lessee under a finance lease) to earn rentals or for capital appreciation or both, rather than for use in the production or supply of services or for administrative purposes or sale in the ordinary course of business. The Bank measures the investment properties at cost less accumulated depreciation and impairment, if any. The depreciable amount (book value less residual value) of the investment properties must be allocated over their useful lives. Depreciation and amortization are calculated using the straight-line method over the estimated useful lives of the assets.

The fair value of the investment properties is established mainly by external experts. According to the opinion of the Management there is no significant difference between the fair value and the carrying value of these properties.

**2.12. Financial liabilities**

The financial liabilities are presented within these lines in the Separate Financial Statements:

- Amount due to banks, the National Governments, deposits from the National Banks and other banks
- Repo liabilities
- Financial liabilities designated at fair value through profit or loss
- Deposits from customers
- Liabilities from issued securities
- Derivative financial liabilities held for trading
- Derivative financial liabilities designated as hedge accounting
- Other financial liabilities

At initial recognition, the Bank measures financial liabilities at fair value plus or minus – in the case of a financial liability not at fair value through profit or loss – transaction costs that are directly attributable to the acquisition or issue of the financial liability.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.12. Financial liabilities [continued]**

Usually, the initial fair value of financial liabilities equals to transaction value. However, when the amounts are not equal, the initial fair value difference should be recognized.

If the fair value of financial liabilities is based on a valuation technique using only inputs observable in market transactions, the Bank recognizes the initial fair value difference in the Separate Statement of Profit or Loss.

When the fair value of financial liabilities is based on models for which inputs are not observable, the difference between the transaction price and the fair value is deferred and only recognized in profit or loss when the instrument is derecognized or the inputs became observable.

Financial liabilities at fair value through profit or loss are either financial liabilities held for trading or they are designated upon initial recognition as at fair value through profit or loss.

In connection to the derivative financial liabilities measured at fair value through profit or loss, the Bank presents the amount of change in their fair value originated from the changes of market conditions and business environment.

The Bank designated some financial liabilities upon initial recognition to measure at fair value through profit or loss. This classification eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases ("accounting mismatch"). The changes in fair value of these liabilities are recognized in profit or loss, except the fair value changes attributable to credit risk which are recognized among other comprehensive income.

In the case of financial liabilities measured at amortised cost, fees and commissions related to the origination of the financial liability are recognised through profit or loss during the maturity of the instrument. In certain cases the Bank repurchases a part of financial liabilities (mainly issued securities or subordinated bonds) and the difference between the carrying amount of the financial liability and the amount paid for it is recognised in the statement of profit or loss and included in other operating income.

**2.13. Leases**

An agreement is a lease or contains a lease if it transfers the rights to control the use of an identified asset for a given period in exchange for compensation.

Expenses related to the use of lease assets, the majority of which were previously recognised in external services costs, will be currently classified as depreciation/amortisation and interest costs. Usufruct rights are depreciated using a straight line method, while lease liabilities are settled using an effective discount rate.

**Recognition of lease liabilities**

The Bank will recognise lease liabilities related to leases which were previously classified as "operating leases" in accordance with IAS 17 Leases. These liabilities will be measured at the present value of lease payments receivable as at the date of commencement of the application of IFRS 16. Lease payments shall be discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the incremental borrowing rate.

At their date of initial recognition, lease payments contained in the measurement of lease liabilities comprise the following types of payments for the right to use the underlying asset for the life of the lease:

- fixed lease payments less any lease incentives,
- variable lease payments which are dependent on market indices,
- amounts expected to be payable by the lessee under residual value guarantees,
- the strike price of a purchase option, if it is reasonably certain that the option will be exercised, and
- payment of contractual penalties for terminating the lease, if the lease period reflects that the lessee used the option of terminating the lease.

The Bank makes use of expedients with respect to short-term leases (less than 12 months) as well as in the case of leases in respect of which the underlying asset has a low value (less than HUF 1.4 million) and for which agreements it will not recognise financial liabilities nor any respective right-of-use assets. These types of lease payments will be recognised as costs using the straight-line method during the life of the lease.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.13. Leases [continued]****Recognition of right-of-use assets**

Right-of-use assets are initially measured at cost.

The cost of a right-of-use asset comprises:

- the amount of the initial measurement of lease liabilities,
- any lease payments made at or before the commencement date, less any lease incentives received,
- any initial direct costs incurred by the lessee,
- estimates of costs to be incurred by the lessee as a result of an obligation to disassemble and remove an underlying asset or to carry out renovation/restoration.

Right-of-use assets are presented separately in the financial statements.

**2.14. Share capital**

Share capital is the capital determined in the Articles of Association and registered by the Budapest-Capital Regional Court. Share capital is the capital the Bank raised by issuing common stocks at the date the shares were issued. The amount of share capital has not changed over the current period.

**2.15. Treasury shares**

Treasury shares are shares which are purchased on the stock exchange and the over-the-counter market by the Bank and are presented in the separate statement of financial position at acquisition cost as a deduction from shareholders' equity. Gains and losses on the sale of treasury shares are recognised directly to shareholder's equity. Derecognition of treasury shares is based on the FIFO method.

**2.16. Interest income, income similar to interest income and interest expense**

Interest income and expenses are recognised in profit or loss in the period to which they relate, using the effective interest rate method.

For exposures categorized into stage 1 and stage 2 the interest income is recognized on a gross basis. For exposures categorized into stage 3 (using effective interest rate) and for POCI (using credit-adjusted effective interest rate) the interest income is recognized on a net basis.

The time-proportional income similar to interest income of derivative financial instruments calculated without using the effective interest method and the positive fair value adjustment of interest rate swaps are also included in income similar to interest income. Interest income of FVTPL loans is calculated based on interest fixed in the contract and presented in "Income similar to interest income" line.

Interest from loans and deposits are accrued on a daily basis. Interest income and expense include certain transaction cost and the amortisation of any discount and premium between the initial carrying amount of an interest-bearing instrument and its amount at maturity calculated on an effective interest rate basis.

All interest income and expense recognised are arising from loans, placements with other banks, repo receivables, securities at fair value through other comprehensive income, securities at amortised cost, and amounts due to banks, repo liabilities, deposits from customers, liabilities from issued securities, subordinated bonds and loans are presented under these lines of financial statements

**2.17. Fees and Commissions**

Fees and commissions that are not involved in the amortised cost model are recognised in the Separate Statement of Profit or Loss on an accrual basis according to IFRS 15 (For details see Note 31). These fees are related to deposits, cash withdrawal, security trading, bank card, etc.

The Bank earns fee and commission income from a diverse range of financial services it provides to its customers. Fee and commission income is recognised at an amount that reflects the consideration to which the Bank expects to be entitled in exchange for providing the services. The performance obligations, as well as the timing of their satisfaction, are identified, and determined, at the inception of the contract. When the Bank provides a service to its customers, consideration is invoiced and generally due immediately because it typically controls the services before transferring them to the customer.

The Bank provides foreign exchange trading services to its customers, the profit margin achieved on these transactions is presented as Net profit from fees and commissions in the Separate Statement of Profit or Loss.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.17 Fees and Commissions [continued]**

Performance obligations satisfied over time include asset management, deposit and account maintenance services, where the customer simultaneously receives and consumes the benefits provided by the Bank's performance as the Bank performs.

**The Bank's fee and commission income from services where performance obligations are satisfied over time are followings:**

**Deposit and account maintenance fees and commissions and fees related to cash withdrawal**

The Bank provides a number of account management services for both retail and corporate customers in which they charge a fee. Fees related to these services can be typically account transaction fees (money transfer fees, direct debit fees, money standing order fees, etc.), internet banking fees (e.g. OTP Direct fee), account control fees (e.g. sms fee), or other fees for occasional services (account statement fees, other administration fees, etc.). Fees for ongoing account management services are charged to the customer's account on a monthly basis. The fees are commonly fixed amounts that can vary per account package and customer category. In the case of the transaction-based fees where the services include money transfer the fee is charged when the transaction takes place. The rate of the fee is typically determined in a certain % of the transaction amount. In the case of other transaction-based fees (e.g. SMS fee), the fee is settled monthly. In the case of occasional services, the Bank basically charges the fees when the services are used by the customer. The fees can be fixed fees or they can be set in %. The rates are reviewed by the Bank regularly.

These fees for ongoing account management services are charged on a monthly basis during the period when they are provided. Transaction-based fees are charged when the transaction takes place or charged monthly at the end of the month.

**Fees and commission related to the issued bank cards**

The Bank provides a variety of bank cards to its customers, for which different fees are charged. The fees are basically charged in connection with the issuance of cards and the related card transactions. The annual fees of the cards are charged in advance in a fixed amount. The amount of the annual card fee depends on the type of card. In case of transaction-based fees (e.g. cash withdrawal/payment fee, merchant fee, interchange fee, etc.), the settlement of the fees will take place immediately after the transaction or on a monthly basis. The fee is typically determined in % of the transaction with a fixed minimum amount. For all other cases where the Bank provides a continuous service to the customers (e.g. card closing fee), the fees are charged monthly. The fee is calculated in a fixed amount. The rates are reviewed by the Bank regularly.

These fees for ongoing services are charged on a monthly basis during the period when they are provided. Transaction-based fees are charged when the transaction takes place or charged monthly at the end of the month.

**Fees and commissions related to security account management services**

The Bank provides its clients security account management services. Fees will be charged for account management and transactions on accounts. Account management fees are typically charged quarterly or annually. The amount is determined in %, based on the stocks of securities managed by the clients on the account in a given period. Fees for transactions on the securities account are charged immediately after the transaction. They are determined in %, based on the transaction amount. Fees for complex services provided to clients (e.g. portfolio management or custody) are typically charged monthly or annually. The fees are fixed monthly amounts and in some cases a bonus fee are charged.

These fees for ongoing services are charged quarterly or annually during the period when they are provided. The fees are accrued monthly. Transaction-based fees are charged when the transaction takes place.

**Fees and commissions related to fund management**

Fees from fund management services provided to investment funds and from portfolio management provided to insurance companies, funds. The fee income are calculated on the basis of net asset value of the portfolio and by the fee rates determined in the contracts about portfolio management.

These fees for ongoing services are charged usually on monthly (mutual funds) or semi-annually (venture capital funds) during the period when they are provided but accrued monthly.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.17 Fees and Commissions [continued]****Net insurance fee income**

Due to the fact that the Bank rarely provides insurance services to its clients, only acts as an agent, the fee income charged to the customers and fees payable to the insurance company are presented net in the fee income. In addition, agency fee charged for the sale of insurance contracts is also recorded in this line. The fee is charged on a monthly basis and determined in %.

Fees for ongoing services are charged on a monthly basis during the period when they are provided.

**Other fees**

Fees that are not significant in the Bank total income are included in Other fees category. Such fees are safe lease, special procedure fee, account rent fee, fee of a copy of document, etc. Other fees may include charges for continuous services or for ad hoc administration services. Continuous fees are charged monthly (e.g., safe lease fees) at the beginning of the period, typically at a fixed rate. Fees for ad hoc services are charged immediately after the service obligation were met, usually in a fixed amount.

These fees for ongoing services are charged on a monthly basis during the period when they are provided. Fees for ad hoc services are charged when the transaction takes place.

**2.18. Dividend income**

Dividend income refers to any distribution of entity's earnings to shareholders from stocks or mutual funds that is owned by the Bank. The Bank recognizes dividend income in the separate financial statements when its right to receive the payment is established.

**2.19. Income tax**

The Bank considers corporate income tax and local business tax and the innovation contribution as income tax in Hungary. The annual taxation charge is based on the tax payable under Hungarian fiscal law, adjusted for deferred taxation. Deferred taxation is accounted for using the balance sheet liability method in respect of temporary differences between the tax bases of assets and liabilities and their carrying value for financial reporting purposes, measured at the tax rates that are expected to apply when the asset is realised or the liability is settled.

Current tax asset or current tax liability is presented related to income tax and innovation contribution separately in the Separate Statement of Financial Position.

Pillar Two – Global Anti-base Erosion Model Rules (“GloBE”), global minimum tax – introduced a minimum effective tax rate of at least 15%, calculated based on a specific rule set. Pillar Two legislation has been enacted in certain jurisdictions where the Bank operates. The legislation became effective for the Bank's financial year beginning 1 January 2024. The Bank considers this top-up tax as an income tax according to IAS 12.

Deferred tax assets are recognized by the Bank for the amounts of income tax that are recoverable in future periods in respect of deductible temporary differences as well as the carry forward of unused tax losses and the carryforward of unused tax credits.

The Bank recognizes a deferred tax asset for all deductible temporary differences arising from investments in subsidiaries, branches and associates, and interests in joint arrangements, to the extent that, and only to the extent that, it is probable that:

- the temporary difference will reverse in the foreseeable future; and
- taxable profit will be available against which the temporary difference can be utilised.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.19 Income tax [continued]**

The Bank considers the availability of qualifying taxable temporary differences and the probability of other future taxable profits to determine whether future taxable profits will be available.

The Bank recognizes a deferred tax liability for all taxable temporary differences associated with investments in subsidiaries, branches and associates, and interests in joint arrangements, except to the extent that both of the following conditions are satisfied:

- the Bank is able to control the timing of the reversal of the temporary difference, and
- it is probable that the temporary difference will not reverse in the foreseeable future.

The Bank only offsets its deferred tax liabilities against deferred tax assets when:

- there is a legally enforceable right to set-off current tax liabilities against current tax assets, and
- the taxes are levied by the same taxation authorities on either
  - the same taxable entity or
  - different taxable entities which intend to settle current tax liabilities and assets on a net basis.

**2.20. Banking tax**

The Bank is obliged to pay banking tax based on Act LIX of 2006. As the calculation is not based on the taxable profit (but the adjusted Assets total calculated based on the Separate Financial Statements for the second period preceding the current tax year), banking tax is not considered as income tax. Therefore, the banking tax is considered as an other administrative expense, not as income tax.

Pursuant to Government Decree No. 197/2022 published on 4 June 2022, the Hungarian Government decided to impose a windfall tax on credit institutions and financial enterprises temporarily, that is for 2022 and 2023.

During 2024, the Government amended the Decree on the windfall tax and the obligation was extended to 2025.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.21. Off-balance sheet commitments and contingent liabilities, provisions**

In the ordinary course of its business, the Bank has entered into off-balance sheet commitments such as guarantees, commitments to extend credit, letters of credit and transactions with financial instruments. The provision on off-balance sheet commitments and contingent liabilities is maintained at a level adequate to absorb probable future losses which are probable and relate to present obligations.

Those commitments and contingent liabilities Management determines the adequacy of the provision based upon reviews of individual items, recent loss experience, current economic conditions, the risk characteristics of the various categories of transactions and other pertinent factors.

The Bank recognizes a provision for off-balance sheet commitment and contingent liabilities in accordance with IAS 37 when it has a present obligation as a result of a past event; it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation; and a reliable estimate can be made of the obligation.

Expected credit loss model is applied for given financial guarantees and loan commitments which are under IFRS 9 the, when the provision is calculated (see more details in Note 2.6.). After initial recognition the Group subsequently measures those contracts at a higher of the amount of the loss allowance or of the amount initially recognised less the cumulative amount of income recognized in accordance with IFRS 15.

**2.22. Share-based payment**

The Bank has applied the requirements of IFRS 2 Share-based Payment.

In its separate financial statements, OTP Bank treats OTP Bank Employee Stock Ownership Plan Organization (“OTP ESOP”) as a distinct reporting entity and therefore recognises the transfer of assets to OTP ESOP in a manner consistent with the transaction’s legal form.

The Bank issues equity-settled share-based payments to certain employees. Equity-settled share-based payments are measured at fair value at the grant date. The fair value determined at the grant date of the equity-settled share-based payments is expensed on a straight-line basis over the year, based on the Bank’s estimate of shares that will eventually vest.

Fair value is measured by use of a binomial model. The expected life used in the model has been adjusted, based on Management’s best estimate, for the effects of non-transferability, exercise restrictions, and behavioural considerations.

**2.23. Employee benefits**

The Bank has applied the requirement of IAS 19 Employee Benefits. The Bank’s short-term employee benefits are wages, salaries and bonuses, premium, paid annual leave and paid sick leave and other free services (health care, reward holiday). Short-term employee benefits are expected to pay by the Bank within 12 month. These benefits are recognised as an expense and liability undiscounted in the separate financial statements.

Short-term employee benefits are employee benefits (other than termination benefits) that are expected to be settled wholly before twelve months after the end of the annual reporting period in which the employees render the related service. These can be wages, salaries and bonuses, premium, paid annual leave and paid sick leave and other free services (health care, reward holiday). Long-term employee benefits are mostly the jubilee reward.

Post-employment benefits are employee benefits (other than termination and short-term employee benefits) that are payable after the completion of employment. Post-employment benefit plans are formal or informal arrangements under which an entity provides post-employment benefits for one or more employees. Post-employment benefit plans are classified as either defined contribution plans or defined benefit plans, depending on the economic substance of the plan as derived from its principal terms and conditions.

Termination benefits are employee benefits provided in exchange for the termination of an employee’s employment as a result of either: an entity’s decision to terminate an employee’s employment before the normal retirement date or an employee’s decision to accept an offer of benefits in exchange for the termination of employment. Other long-term employee benefits are all employee benefits other than short-term employee benefits, postemployment benefits and termination benefits.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.24. Separate statement of cash flows**

Cash flows arising from the operating, investing or financing activities are reported in the Statement of Cash-Flows of the Bank primarily on a gross basis. Net basis reporting are applied by the Bank in the following cases:

- when the cash flows reflect the activities of the customer rather than those of the Bank, and
- for items in which the turnover is quick, the amounts are large, and the maturities are short.

For the purposes of reporting cash flows “Cash, due from banks and balances with the NBH” line item excluding compulsory reserve are considered as cash and cash equivalents by the Bank. This line item shows balances of HUF and foreign currency cash amounts, and sight deposits from NBH and from other banks, furthermore balances of current accounts.

Cash flows from hedging activities are classified in the same category as the item being hedged. The unrealised gains and losses from the translation of monetary items to the closing foreign exchange rates and the unrealised gains and losses from derivative financial instruments are presented separately net in the statement of cash flows for the monetary items which have been revaluated.

**2.25. Segment reporting**

IFRS 8 Operating Segments requires operating segments to be identified on the basis of internal reports about components of the Bank that are regularly reviewed by the chief operating decision maker in order to allocate resources to the segments and to assess their performance.

At separate level, the Management does not separate and makes decisions based on different segments; the segments are identified by the Bank only at consolidated level in line with IFRS 8 paragraph 4. At Group level the segments identified by the Bank are the business and geographical segments.

The Group's operating segments under IFRS 8 are therefore as follows: OTP Core Hungary, Russia, Ukraine, Bulgaria, Romania, Serbia, Croatia, Montenegro, Albania, Moldova, Slovenia, Uzbekistan, Merkantil Group, Asset Management subsidiaries, other subsidiaries, Corporate Centre. Romanian segment is classified as discontinued operation from 2023 but in line with management report it is still presented in Segment reporting as separate segment.

**2.26. Comparative figures**

These separate financial statements are prepared in accordance with the same accounting policies in all respects as the Financial Statements prepared in accordance with IFRS as adopted by the EU for the year ended 31 December 2024

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**NOTE 3: SIGNIFICANT ACCOUNTING ESTIMATES AND DECISIONS IN THE APPLICATION OF ACCOUNTING POLICIES**

The presentation of separate financial statements in conformity with IFRS requires the Management of the Bank to make judgements about estimates and assumptions that affect the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities as at the date of the financial statements and their reported amounts of revenues and expenses during the reporting period. The estimates and associated assumptions are based on expected loss and other factors that are considered to be relevant. The estimates and underlying assumptions are reviewed on an on-going basis. Revisions to accounting estimates are recognized in the period. Actual results could differ from those estimates. Significant areas of subjective judgements include:

**3.1. Loss allowance on financial instruments**

The Bank regularly assesses its financial instruments for impairment. Management determines the adequacy of the allowances based upon reviews of individual loans and placements, recent loss experience, current economic conditions, the risk characteristics of the various categories of loans and other pertinent factors. The use of a new, three stage model was implemented for IFRS 9 purposes. The new impairment methodology is used to classify financial instruments in order to determine whether credit risk has significantly increased since initial recognition and able to identify credit-impaired assets. For instruments with credit-impairment or significant increase of credit risk lifetime expected losses will be recognized. (For details see note 36.1.1.)

**3.2. Valuation of instruments without direct quotations**

Financial instruments without direct quotations in an active market are valued using the valuation model technique. The models are regularly reviewed and each model is calibrated for the most recent available market data. While the models are built only on available data, their use is subject to certain assumptions and estimates (e.g. for correlations, volatilities, etc). Changes in the model assumptions may affect the reported fair value of the relevant financial instruments.

IFRS 13 Fair Value Measurement seeks to increase consistency and comparability in fair value measurements and related disclosures through a 'fair value hierarchy'. The hierarchy categorises the inputs used in valuation techniques into three levels. The hierarchy gives the highest priority to (unadjusted) quoted prices in active markets for identical assets or liabilities and the lowest priority to unobservable inputs. The Bank evaluates the levelling at each reporting period on an instrument-by-instrument basis and reclassifies instruments when necessary, based on the facts at the beginning of the reporting period. The objective of a fair value measurement is to estimate the price at which an orderly transaction to sell the asset or to transfer the liability would take place between market participants at the measurement date under current market conditions.

**3.3. Provisions**

Provision is recognised and measured for commitments to extend credit and for warranties arising from banking activities based on IFRS 9 Financial Instruments. Provision for these instruments is recognised based on the credit conversion factor, which shows the proportion of the undrawn credit line that will be probably drawn.

Other provision is recognised and measured based on IAS 37 Provisions, Contingent Liabilities and Contingent Assets. The Bank is involved in a number of ongoing legal disputes. Based upon historical experience and expert reports, the Bank assesses the developments in these cases, and the likelihood and the amount of potential financial losses which are appropriately provided for. (See Note 24.)

Other provision for off-balance sheet items includes provision for litigation, provision for retirement and expected liabilities and provision for Confirmed letter of credit.

A provision is recognised by the Bank when it has a present obligation as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation.

**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK****Macro economy and financial situation in Hungary**

The Trump administration, which took office on 20 January 2025, significantly changed the global economy in 2025, when it began to implement campaign promises, including the introduction of import tariffs. The unfolding tariff war caused huge turbulence in the markets through unpredictability, economic damage and the disruption of trade relations. Year 2025 also brought a major change in the direction of the USA's foreign policy, which, amid increasing geopolitical conflicts around the world, forced its allies, including NATO members, to boost their defence spending, placing a serious burden on their budgets. After the increase in yields owing to Donald Trump's victory in 2024, developed markets' bond yields declined somewhat in 2025, and the dollar has weakened against the euro.

In the first quarter of 2025, the US economy felt the pain of preparing for the tariff war: to avoid tariffs, imports were brought forward, which, through falling net exports, has slowed economic growth to a halt but this was reversed in the second and third quarters. Overall, the US economy sailed through the first year of the second Trump administration with a better performance than the 1.5-2.0% growth expected at the beginning of 2025. Based on the available data, annual growth exceeded 2%, fuelled by consumer spending and AI investments. The outlook for the labour market was clouded by Donald Trump's strict immigration policy, by demographic trends, and by the rapid rise of artificial intelligence, while, despite the US president's plans, the industry failed to create a large number of new jobs. Nevertheless, the situation in the labour market, which deteriorated rapidly in the first half of the year, stabilized by the end of 2025. Despite the inflationary economic policy measures of the new administration, inflation did not accelerate, yet it remained above the Fed's 2% target, which justified caution regarding interest rate cuts, despite deteriorating labour market conditions. The interest rate cut cycle that began at the end of 2024 came to a halt at the beginning of 2025 and the next cut did not come before September. Thus, the base rate was reduced by a total of 75 basis points, to 3.5-3.75%, by the end of the year. There is still significant tension in the bond market, because the debt-to-GDP ratio is at an all-time high, around 125%, and the deficit remained at an elevated level, above 5% of GDP, because despite the significant improvement in the budget balance thanks to tariff revenues, the Trump administration's Big Beautiful Bill extended tax breaks, while the promised spending cuts were not implemented.

Despite the tariff war and increasing geopolitical tensions, the eurozone's recovery from previous shocks (energy crisis, war, inflation, and interest rate shocks) continued throughout 2025. Adding to the euro area economy's problems, the block is forced to reallocate huge amounts of money to defence spending, meanwhile, the car industry, the flagship of the European manufacturing industry, is lagging behind in technological transition. In 2025, the eurozone's GDP expanded by 1.5% including Ireland's extremely volatile figures; without Ireland, the growth rate was 1.0%. The unemployment rate was at a historic low of 6.2% in December. Inflation was still well above the 2% target in the first months of the year, but in the rest of the year both headline and core inflation fell back, drawing closer to the ECB's target. Wage growth, which had previously fuelled inflation, slowed in the second half of 2025, so by the end of the year only the high level of services inflation was a cause for concern. In the first half-year, the ECB cut the effective (deposit) rate from 2.75% to 2.0%, the main refinancing rate from 3.15% to 2.15%, and the marginal lending rate from 3.15% to 2.4%, and they remained at these levels until the end of the year. In Europe, investors also focus on concerns about fiscal sustainability, especially in France, which is struggling with 110% public debt and 6% deficit, as well as political crises.

Hungary's economy has been practically stagnant since 2023 on account of the energy crisis, shrinking export markets, strong exposure to the automotive and battery industries, the freezing of EU funds, the collapse of the previous investment boom, and pressure for strictness in economic policy. Although fiscal austerity ended in 2025 and Europe's growth also improved towards the end of 2025, Hungary's economic growth remained pale throughout last year, when GDP expanded by barely 0.4%, according to preliminary data from the KSH statistical office, as consumption growth was offset by shrinking investment and declining exports. The tightness of the labour market clearly decreased during the year, but the unemployment rate did not increase meaningfully.

By the beginning of 2025, headline and constant tax core inflation (the latter is closely watched by the MNB) both accelerated to almost 6%. The reasons for the walking inflation are manifold: inflation expectations stuck at elevated levels, corporations' rapid repricing, the weak forint at the end of 2024, rising food prices, excessively high wage dynamics, and passed-on special taxes all contributed. The government and the MNB both reacted to the high inflation. The government has been curbing price increases with a number of administrative measures since spring 2025, which have held back price growth by around 1.5 percentage points. In order to achieve the inflation target, the MNB's new leadership broke with the policy of the weak forint and, despite expectations of an interest rate cut, left the key interest rate at 6.5% until the end of 2025. This, together with several other favourable factors, strengthened the forint, helping to bring down the EUR/HUF below 385 by the end of 2025, from around 410 at the year-beginning.

**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK  
[continued]****Macro economy and financial situation in Hungary [continued]**

According to the Ministry of National Economy, Hungary's budget deficit amounted to 4.9% of GDP in 2025, while public debt could be around 74.6% of GDP, in an increase from 73.5% at the end of 2024. The government announced a string of fiscal stimulus measures in 2025, but most of them will affect the budget from 2026 onwards.

Given that Hungary's current account surplus is around 2% of GDP, the gross external debt ratio is between 60% and 65% of GDP, and as foreign exchange reserves are about EUR 10 billion higher than the reserve adequacy rules require, Hungary's external balance position is much stronger than the level that be considered sustainable.

All international credit rating agencies rated Hungary's sovereign debt as investment grade last year.

In 2025, Hungary's housing market was significantly boosted by the expansion of available subsidies, the Home Start programme, which reduced the effective lending rate to 3%, and by the rapid wage growth. As a result, the growth of household credit volumes accelerated to 14% (from 9% at the end of 2024), and that of housing loans to 20%, up from 13%.

**Summary of economic policy measures made and other relevant regulatory changes in the period under review****Windfall tax**

- On 19 June 2025, the Parliament decided, through Act No. LIV of 2025, to maintain the windfall tax obligation for financial institutions for the year 2026 as well. In 2026, the tax base is the adjusted profit for the year 2024, and the rate increases to 8% up to a tax base of HUF 20 billion, and to 20% above that (from the previous 18%). The option to halve the payable tax remains available under the conditions specified in the act, similarly to previous years.
- In accordance with Government Decree No. 358/2025 (XI. 13.), the provisions of the windfall tax legislation shall be applied with the following amendments: from 2026, the tax rate will be 10% (instead of 8%) up to HUF 20 billion tax base, and 30% (instead of 20%) above. In 2026, the rules on tax reduction related to the purchase of government securities were tightened: the reduction may not exceed 10% of the increase in the relevant government securities holdings and may not exceed 30% (instead of 50%) of the windfall tax calculated without taking this reduction into account.

**Interest rate cap:**

- On 26 June 2025, Government Decree No. 170/2025 (VI.26) enacted the extension of the interest rate cap on certain housing loans, until 31 December 2025.
- On 26 November 2025, Government Decree No. 364/2025 (XI.26) enacted the extension of the interest rate cap on certain housing loans, until 30 June 2026.

**Freeze on retail banking fees**

- On 9 April 2025, the Hungarian Banking Association agreed with the Ministry of National Economy that banks will not apply fee changes resulting from inflation indexation or increase in other operating cost items to their retail customers until 30 June 2026. Those banks that had already announced their inflation indexation for 2025 according to the law, shall reverse such increases either through itemized refunds or by providing a permanent discount, or with a refund of the same amount at customer group's level.  
Within this framework, on 8 April 2025, OTP Bank announced that it was ready to reduce the fees of its retail customers by a total of almost HUF 2 billion and to extend certain preferential promotions worth several billions of HUF.
- On the other hand, the banking sector, via the representatives of the Hungarian Banking Association, have also concluded an agreement with the Hungarian National Bank. This agreement, in addition to temporarily reducing the monthly fee of so-called basic accounts which represent a narrow range of bank accounts, also makes a wide range of retail bank accounts simpler and more transparent.

**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK  
[continued]**

**Summary of economic policy measures made and other relevant regulatory changes in the period under review  
[continued]**

**Cash withdrawals**

- On 29 April 2025, Hungary's National Assembly decided that payment service providers shall provide their customers with cash withdrawal services in all settlements. Based on a decree of the Ministry of National Economy from the end of May, banks are obliged to provide cash withdrawal services to their customers in all settlements with more than 1,000 inhabitants by 31 December 2025, and in all settlements with more than 500 inhabitants by 31 December 2026. Based on the MNB's decree of the end of June, in the case of OTP this means the installation of 195 new or relocated ATMs across Hungary in 2025 and further 233 in 2026.
- Pursuant to Act C of 2025, the monthly limit for free cash withdrawals, available twice per month, was increased to HUF 300,000 effective from 1 February 2026, replacing the former limit of HUF 150,000, that was applicable until the end of January 2026.

**Family support schemes and economic stimulus measures**

- The Workers' Loan Program became available at credit institutions from 2 January 2025. The maximum amount of this interest-free, free-use, state-guaranteed subsidised loan is HUF 4 million, with a term of 10 years. The scheme also features a partial repayment by the State depending on the birth of children.
- From 1 January 2025, housing loans are available for energy-efficient homes up to 90% of the collateral value, and the repayment instalment may reach 60% of the borrower's income, regardless of the income.
- On 1 January 2025, the Rural Home Renovation Subsidy was launched in settlements with less than 5,000 residents with a maximum amount of HUF 3 million, for up to 50% of the labour and material costs. The range of applicants has been modified several times, so now the subsidy is also available to pensioners. For the advance investment costs, borrowers may apply for a subsidised home renovation mortgage loan in a maximum amount of HUF 6 million, with a fixed 3% interest rate.
- On 15 October 2025, the conditions of the energy home renovation programme, targeting the modernisation of family homes built before 2007, were amended. The maximum available amount increased from HUF 6 million to HUF 10 million, of which HUF 5 million is a non-refundable grant and HUF 5 million can be taken as an interest-free loan. The required own contribution was reduced to 5%, mandatory contractor registration was abolished, and the range of eligible renovation activities were widened with for example shading devices, solar collectors, and control systems being included into the list.
- From 6 January 2025, as part of the Demján Sándor program, export stimulating loan and leasing structures are available in the total sum of HUF 400 billion, partly refinanced by EXIM Hungary. Some of the products are also available for enterprises planning to start export activities in the future.
- The interest rate of certain products under the Széchenyi Card Program MAX+ scheme was significantly reduced for contracts concluded after 1 March 2025: the interest rate on investment loans and the leasing scheme was reduced to 3%, while the interest rate on the Széchenyi Card Overdraft MAX+ and the Liquidity Loan was reduced to 4.5%. The uniform 0.5 pp reduction in client interest rates was facilitated by the burden sharing of KAVOSZ Ltd. (0.1 pp) and the banking sector (0.4 pp).
- On 6 October 2025, the Government announced that the interest rate on business loans available under the Széchenyi Card Program was uniformly reduced to a fixed 3%. The initiative aims to support the liquidity of domestic small and medium-sized enterprises (SMEs) and encourage their investments to stimulate the economy. The liquidity and investment loans available under the programme are freely usable and can be accessed quickly and easily. In 2026, the Government will allocate HUF 60 billion for interest subsidies, while the total state support for the entire Széchenyi Card system will reach HUF 320 billion.
- The subsidised Home Start Loan Program is available from 1 September 2025, regardless of marital status or plans to have children. The terms and conditions of the loan have been modified several times since the announcement, but the essential elements remained unchanged: the maximum amount of the one-time applicable loan is HUF 50 million, with a fixed interest rate of up to 3%, for a maximum term of 25 years and with at least 10% downpayment. The loan is available if, at the time of application and during the preceding 10 years, the applicant has not held more than 50% ownership share in a residential property, and if had at least two years of uninterrupted social security coverage. The loan can be used for residential properties with a maximum value of HUF 100 million in the case of a flat, or HUF 150 million in the case of a house, which price shall not exceed HUF 1.5 million per square metre. The loan may be combined with other (subsidised) home loans. The detailed rules of the loan are set in Government Decree 227/2025 (VII. 31.).

**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK  
[continued]**

**Summary of economic policy measures made and other relevant regulatory changes in the period under review  
[continued]**

**Family support schemes and economic stimulus measures [continued]**

- The MNB launched the Qualified Corporate Credit (MVH, Minősített Vállalati Hitel) title in order to intensify competition in the banking system. The aim of the initiative, which was launched following an agreement between the central bank and the Hungarian Banking Association, is to bring investment loans with standardized, transparent terms and conditions to the market, and to make them accessible to a wide range of SMEs, with simple and quick administration and favourable pricing. OTP branches were the first in Hungary to offer the facility to customers, on 1 September.

**Capital regulation**

- Pillar 2 capital requirement: based on the announcement made on 16 December 2025, effective from 1 January 2026 the National Bank of Hungary, including a multilateral procedure involving the European Central Bank, and National Bank of Croatia, imposed the below additional capital requirements for OTP Group, on consolidated level:
  - 1.01%-points in case of the Common Equity Tier1 (CET1) capital, accordingly the minimum requirement for the consolidated CET1 ratio is 5.51% (without regulatory capital buffers);
  - 1.34%-points in case of the Tier1 capital, accordingly the minimum requirement for the consolidated Tier1 ratio is 7.34% (without regulatory capital buffers);
  - 1.79%-points in case of the Total SREP Capital Requirement (TSCR), accordingly the minimum requirement for the consolidated capital adequacy ratio is 9.79% (without regulatory capital buffers).

These requirements do not represent any change compared to the additional capital requirements applicable in the preceding period.

**Larger one-off/special items**

***Special taxes on financial institutions:***

In 2025 HUF (87.4) billion special taxes on financial institutions weighed on earnings (after tax) which incorporates both the old banking tax in Hungary (HUF (29.9) billion after tax) and the windfall tax on extra profits (HUF (49.6) billion after tax). Outside of Hungary, in Slovenia (HUF (7.9) billion after tax) arose banking tax payment obligation.

***Interest rate cap in Hungary:***

In 2025 altogether HUF (7.7) billion (after tax) amount was recognized in relation to the expected negative impact of the rate cap scheme in Hungary. According to the effective regulation, in Hungary the interest rate cap on the affected Hungarian mortgage loans was extended until 30 June 2026.

***Provision on Russian bonds:***

In Hungary and Bulgaria HUF (5.1) billion (after tax) impairment was created on Russian bonds, of which HUF (6.4) billion (after tax) was booked at OTP Bank (Hungary) and HUF 1.3 billion (after tax) release at DSK Bank (Bulgaria). Consequently, the coverage of Russian bonds increased from 73% in 2024 to 74% in 2025.

On 4 December 2025 around EUR 63 million equivalent Russian bonds matured. Of this amount, EUR 21 million was paid out on the maturity date in Russian roubles, while the authorisation process for the payment of the remaining amount was completed in December. In the period since then, the relevant legal proceedings have been initiated, which – if concluded favourably – are expected to result in the principal repayments being credited to the own accounts of OTP Bank and DSK Bank. Management's expectations regarding the ongoing proceedings related to the principal repayments are positive, as no circumstances have arisen to date that would suggest that the amounts will not be credited to the own accounts of OTP Bank and DSK Bank.

***Revaluation result of retail subsidized loans:***

Based on the IFRS9 accounting standard, some Hungarian subsidized mortgage loans, such as CSOK (Housing Subsidy for Families), CSOK Plus and Home Start, as well as baby loans and worker' loans must be recorded in the statement of financial position at fair value through profit or loss. The negative revaluation result of these loans amounted to HUF (5.8) billion (after tax) in 2025.

**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK  
[continued]****The principles used in the preparation of the Separate Statement of Financial Position as at 31 December 2025 in connection with the evaluation of Russian and Ukrainian exposures****Ukraine**

In 2022 Russia launched a still ongoing war against Ukraine.

OTP Group's Ukrainian operation incorporates the Ukrainian bank, as well as the leasing and factoring companies. The country-consolidated Ukrainian total assets represented HUF 1,139 billion at the end of 2024 (2.5% of total consolidated assets), while net loans comprised HUF 410 billion (1.6% of consolidated net loans) and shareholders' equity amounted to HUF 212 billion (3.8% of the consolidated total equity).

At the end of 2025 the gross intragroup funding towards the Ukrainian operation represented HUF 49 billion, while taking into account the Ukrainian deposits placed with the Headquarters, i.e. the net group funding stood at HUF 25 billion equivalent towards the Ukrainian operation.

In 2025 the Ukrainian operation posted a profit after tax of HUF 55.8 billion, one third more than the HUF 41.2 billion in 2024.

**Russia**

The total assets of the Group's Russian operation represented HUF 3.321 billion at the end of 2025 (7.3% of consolidated total assets), while net loans comprised HUF 1,497 billion (5.8% of consolidated net loans) and shareholders' equity HUF 440 billion (7.8% of consolidated total equity).

The Russian operation posted HUF 202.0 billion profit after tax in 2025, after the HUF 136.9 billion profit reached in full-year 2024.

As the Russian subsidiary repaid its maturing intragroup loans in 4Q 2022, the gross intragroup funding towards the Russian operation declined to zero and remained nil since then. At the end of 2024 the intragroup subordinated loan exposure toward the Russian operation amounted to HUF 9 billion equivalent.

Based on individual permits issued by the Central Bank of Russia, a total of RUB 67.7 billion in dividends has been paid since September 2023, of which RUB 25.9 billion was paid in 2025.

In the case of Ukraine and Russia OTP management applies a „going concern” approach, however in Russia the management is still considering all strategic options, bearing in mind that any future solution should be strictly within the framework and in accordance with applicable local and international regulations.

If the Russian entity was deconsolidated and the outstanding gross intragroup exposures were written off as well, the effect for the consolidated CET1 ratio would be +13 bps, whereas in the case of Ukraine this effect would be -10 bps.

**Significant estimates affected by the Russian-Ukrainian conflict during the preparation of these Separate Financial Statements**

During the preparation of these Separate Financial Statements, the Bank identified the following estimates, which were significantly affected by the Russian-Ukrainian conflict:

- 1) Evaluation of Russian sovereign exposures (government securities) and related reserves for expected credit losses at OTP Bank (as parent company)
- 2) Evaluation of Ukrainian sovereign exposures (government securities) and related reserves for expected credit losses at OTP Bank (as parent company)
- 3) Evaluation of derivative transactions denominated in Russian rubles
- 4) Evaluation of derivative transactions denominated in the Ukrainian hryvnia
- 5) Provisions for expected credit losses related to Russian and Ukrainian interbank claims and customer loans (following direct exposure to the Russian and Ukrainian markets, non-Russian and Ukrainian bank exposures)
- 6) Evaluation of investments

	Reference	Gross value	Impairment
Securities at amortized cost	1	21,745	(18,289)
Securities at fair value through other comprehensive income	1	53,009	(44,149)
Other financial assets		21,581	(16,081)
Investments	6	<u>476,254</u>	<u>(329,792)</u>
<b>TOTAL ASSETS</b>		<b><u>572,589</u></b>	<b><u>(408,311)</u></b>

**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK  
[continued]**

**The principles used in the preparation of the Separate Statement of Financial Position as at 31 December 2025 in connection with the evaluation of Russian and Ukrainian exposures**

During the evaluation of these assets, the Bank applied the evaluation principles detailed below, which evaluation contains significant estimates on the part of the Management. The results of the estimates may vary significantly depending on the development of the situation in the Russian-Ukrainian conflict.

**References**

**1. Evaluation of Russian sovereign exposures and related reserves for expected credit losses - other exposures of the group**

Outside of Russia, the marketability of Russian government securities is significantly limited due to sanctions and capital market participants turning away from Russian securities. The credit rating of the Russian state was withdrawn in 2022, the Group classifies the Russian state as non-performing, and in accordance with this, it assigned the affected exposures to the Stage 3 category. The Russian state not only recognizes its obligation and has the necessary financial reserves, but would also be willing to pay, so the increased loss potential is caused by non-traditional credit risks. In the case of a portfolio valued at fair value against other comprehensive income, the book value is determined based on the level 3 prices of IFRS13. Cash-flow estimation, current market benchmarks (provided by Bloomberg), liquidity and non-credit risk considerations were taken into account in fair value calculation.

**2. Valuation of Ukrainian sovereign exposures and related reserves for expected credit losses - other exposures of the group**

Ukrainian government securities are exclusively in the books of the Ukrainian subsidiary.

**3. Valuation of Russian derivative transactions**

In the case of futures contracts concluded with local partners on the Russian market, the evaluation is carried out using yield curves available and observable on the local market. In cases where one of the partners is not Russian, the evaluation is done using yield curves available and observable on the international market.

**4. Valuation of Ukrainian derivatives**

The Treasury turnover of the Ukrainian bank is low, and a significant part of the derivative transactions are related to the bank's risk management and concluded with the parent company. During the actual evaluation, the expected cash-flow is discounted using yield curves observed based on current market benchmarks (published by the National Bank of Ukraine).

**5. Provisions for expected credit losses related to Russian and Ukrainian interbank claims and customer loans (following direct exposure to the Russian and Ukrainian markets, non-Russian and Ukrainian bank exposures)**

As part of the quarterly monitoring activity, the Bank has identified and analysed the secondary and tertiary negative effects of the war in the corporate segment. Changes related to the meanwhile imposed sanctions – which should have been taken into consideration at analysis - have been followed up. As part of the individual monitoring activity separate monitoring methodology and assessment were prepared for exposures above HUF 250 million as follows:

- i) sectors vulnerable to the risk arising from changes of energy / interest / foreign exchange
- ii) customers from sectors with high risks according to the loan policy, especially the hotel industry and real estate utilisation industry
- iii) municipalities, customers owned by municipalities

**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK  
[continued]**

The principles used in the preparation of the Separate Statement of Financial Position as at 31 December 2025 in connection with the evaluation of Russian and Ukrainian exposures [continued]

**References [continued]****5. Provisions for expected credit losses related to Russian and Ukrainian interbank claims and customer loans (following direct exposure to the Russian and Ukrainian markets, non-Russian and Ukrainian bank exposures)**

When technical or objective default occurred due to sanctions the affected exposures were classified into Stage 3. In these cases at least two scenarios were taken into consideration as the estimation of expected cash flows for impairment calculation. At least one scenario represents that case when significant differences occur between the expected and the contractual cash flows. Probabilities shall be allocated to represent the occurrence of credit loss, even in that case when most likely there is no need to recognise impairment loss.

Exposures in amount of HUF 3.1 billion as classified into Stage 3 had an amount of HUF 1.7 billion of expected credit loss as at 31 December 2025. The concerning exposures in amount of HUF 9.9 billion had an amount of HUF 6.8 billion as at 31 December 2024.

**6. Evaluation of investments**

The Bank has evaluated its investments in 3 countries concerning the Russian-Ukrainian conflict based on discounted cash flows, and as a result impairment loss was recognised for the year ended 31 December 2025 as follows:

by Country	Impairment loss for the year ended 31 December 2025
Ukraine	-
Russia	30,453
Moldova	-
<b>Total</b>	<b>30,453</b>

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**NOTE 4: MACRO-ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE BANK**  
**[continued]**
**Financial assets modified during the year ended 31 December 2025***Modification due to the prolongation of existing interest rate cap till 31 December 2025*

Gross carrying amount before modification	37,409
Modification loss	(772)
<b>Gross carrying amount after modification</b>	<b><u>36,637</u></b>
Loss allowance	(452)
<b>Net amortised cost after modification</b>	<b><u>36,185</u></b>

*Modification due to the prolongation of existing interest rate cap till 30 June 2026*

Gross carrying amount before modification	33,703
Modification loss	(698)
<b>Gross carrying amount after modification</b>	<b><u>33,005</u></b>
Loss allowance	(360)
<b>Net amortised cost after modification</b>	<b><u>32,645</u></b>

**Financial assets modified during the year ended 31 December 2024***Modification due to the prolongation of existing interest rate cap till 31 December 2024*

Gross carrying amount before modification	44,974
Modification loss	(1,104)
<b>Gross carrying amount after modification</b>	<b><u>43,870</u></b>
Loss allowance	(763)
<b>Net amortised cost after modification</b>	<b><u>43,107</u></b>

*Modification due to the prolongation of existing interest rate cap till 30 June 2025*

Gross carrying amount before modification	40,881
Modification loss	(875)
<b>Gross carrying amount after modification</b>	<b><u>40,006</u></b>
Loss allowance	(536)
<b>Net amortised cost after modification</b>	<b><u>39,470</u></b>

**NOTE 5: CASH, AMOUNTS DUE FROM BANKS AND BALANCES WITH THE NATIONAL BANK OF HUNGARY (in HUF mn)**

	31 December 2025	31 December 2024
Cash on hand:		
In HUF	88,445	107,982
In foreign currency	<u>13,670</u>	<u>17,784</u>
	<b><u>102,115</u></b>	<b><u>125,766</u></b>
Amounts due from banks and balances with National Bank of Hungary:		
Within one year:		
In HUF	1,082,109	1,531,556
In foreign currency	<u>177,665</u>	<u>419,970</u>
	<b><u>1,259,774</u></b>	<b><u>1,951,526</u></b>
<b>Subtotal</b>	<b><u>1,361,889</u></b>	<b><u>2,077,292</u></b>
<b>Loss allowance</b>	<b>(2,129)</b>	<b>(2,113)</b>
<b>Subtotal</b>	<b><u>1,359,760</u></b>	<b><u>2,075,179</u></b>
Average amount of compulsory reserve	1,001,998	1,163,343
<b>Total</b>	<b><u>357,762</u></b>	<b><u>911,836</u></b>
Rate of the compulsory reserve	8%	10%

The Bank shall deposit compulsory reserve in a determined percent of its liabilities at NBH. Liabilities considered in compulsory reserve calculation are as follows:

- a) deposits and loans,
- b) debt instruments,
- c) repo transactions.

The amount of the compulsory reserve is the multiplication of the daily average of the liabilities considered in the compulsory reserve calculation and compulsory reserve rate, which are determined by the NBH in a specific decree. The Bank is required to complete compulsory reserve requirements in average in the second month after the reserve calculation period, requirements shall be completed once a month on the last calendar day. The Bank complies with the compulsory reserve requirements by the deposit of the adequate amount of cash as the calculated compulsory reserve on the bank account at NBH in monthly average.

An analysis of the change in the loss allowance on placement losses is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>2,113</b>	<b>395</b>
Loss allowance	2,850	3,445
Release of loss allowance	(2,969)	(1,702)
FX movement	<u>135</u>	<u>(25)</u>
<b>Closing balance</b>	<b><u>2,129</u></b>	<b><u>2,113</u></b>

**NOTE 6: PLACEMENTS WITH OTHER BANKS (in HUF mn)**

	31 December 2025	31 December 2024
Within one year:		
In HUF	339,356	380,772
In foreign currency	<u>342,958</u>	<u>173,037</u>
	<b><u>682,314</u></b>	<b><u>553,809</u></b>
Over one year		
In HUF	1,688,195	1,564,539
In foreign currency	<u>794,925</u>	<u>835,407</u>
	<b><u>2,483,120</u></b>	<b><u>2,399,946</u></b>
<b>Total placements</b>	<b><u>3,165,434</u></b>	<b><u>2,953,755</u></b>
Loss allowance on placement losses	<u>(3,890)</u>	<u>(5,219)</u>
<b>Total</b>	<b><u>3,161,544</u></b>	<b><u>2,948,536</u></b>

An analysis of the change in the loss allowance on placement losses is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>5,219</b>	<b>6,875</b>
Loss allowance	2,458	5,074
Release of loss allowance	(3,558)	(7,050)
FX movement	<u>(229)</u>	<u>320</u>
<b>Closing balance</b>	<b><u>3,890</u></b>	<b><u>5,219</u></b>

Interest conditions of placements with other banks (%):

	31 December 2025	31 December 2024
Placements with other banks in HUF	0%-25%	0%-25%
Placements with other banks in foreign currency	-0.06%-9.02%	0%-9.68%
Average interest of placements with other banks	5.72%	6.65%

**NOTE 7: REPO RECEIVABLES (in HUF mn)**

	31 December 2025	31 December 2024
Within one year:		
In HUF	309,146	234,659
In foreign currency	<u>13,423</u>	<u>3,774</u>
	<b><u>322,569</u></b>	<b><u>238,433</u></b>
<b>Total gross amount</b>	<b><u>322,569</u></b>	<b><u>238,433</u></b>
Loss allowance on repo receivables	(201)	(354)
<b>Total repo receivables</b>	<b><u>322,368</u></b>	<b><u>238,079</u></b>

An analysis of the change in the loss allowance on repo receivables is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>354</b>	<b>367</b>
Loss allowance	3,487	2,255
Release of loss allowance	(3,639)	(2,268)
FX movement	(1)	-
<b>Closing balance</b>	<b><u>201</u></b>	<b><u>354</u></b>

Interest conditions of repo receivables (%):

	31 December 2025	31 December 2024
Repo receivables in HUF	5.5%-7.3%	6%-6.9%
Average interest of repo receivables denominated in HUF	6.55%	7.48%
Average interest of repo receivables denominated in foreign	2.07%	3.87%

Securities as collaterals underlying repo receivable contracts is as follows:

**As at 31 December 2025**

Type	Notional	Fair value
Hungarian government bonds	241,305	242,907
Hungarian government discounted Treasury Bills	7,000	6,656
Foreign government bonds	7,296	10,402
Mortgage bonds	64,000	63,431
Other	<u>965</u>	<u>1,362</u>
<b>Total</b>	<b><u>320,566</u></b>	<b><u>324,758</u></b>

**As at 31 December 2024**

Type	Notional	Fair value
Hungarian government bonds	256,068	244,986
Hungarian government discounted Treasury Bills	1,650	1,612
Foreign government bonds	<u>3,896</u>	<u>3,883</u>
<b>Total</b>	<b><u>261,614</u></b>	<b><u>250,481</u></b>

**NOTE 8: FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS (in HUF mn)**

	31 December 2025	31 December 2024
Held for trading securities:		
Government bonds	119,614	57,498
Other non-interest bearing securities	479	377
Hungarian government discounted Treasury Bills	17,389	207
Corporate shares and investments	1,987	1,197
Mortgage bonds	124	117
Other securities	<u>19,601</u>	<u>388,597</u>
<b>Subtotal</b>	<b><u>159,194</u></b>	<b><u>447,993</u></b>
Securities mandatorily measured at fair value through profit or loss		
Shares in investment funds	32,400	30,878
Shares	524	1,304
<b>Subtotal</b>	<b><u>32,924</u></b>	<b><u>32,182</u></b>
Held for trading derivative financial instruments:		
Foreign currency swaps	48,748	63,309
Interest rate swaps	36,677	57,406
CCIRS and mark-to-market CCIRS swaps	49,327	20,730
Other derivative transactions	<u>23,911</u>	<u>29,616</u>
<b>Subtotal</b>	<b><u>158,663</u></b>	<b><u>171,061</u></b>
<b>Total</b>	<b><u>350,781</u></b>	<b><u>651,236</u></b>

Interest conditions and the remaining maturities of securities held for trading are as follows:

	31 December 2025	31 December 2024
Within one year:		
variable interest	10,568	107
fixed interest	<u>35,706</u>	<u>386,175</u>
	<b><u>46,274</u></b>	<b><u>386,282</u></b>
Over one year:		
variable interest	20,321	3,648
fixed interest	<u>90,133</u>	<u>56,489</u>
	<b><u>110,454</u></b>	<b><u>60,137</u></b>
Non-interest bearing securities	<u>2,466</u>	<u>1,574</u>
<b>Total</b>	<b><u>159,194</u></b>	<b><u>447,993</u></b>
Securities held for trading denominated in HUF	73%	94%
Securities held for trading denominated in foreign currency	<u>27%</u>	<u>6%</u>
<b>Securities held for trading total</b>	<b><u>100%</u></b>	<b><u>100%</u></b>
Government bonds denominated in HUF	75%	63%
Government bonds denominated in foreign currency	<u>25%</u>	<u>37%</u>
<b>Government securities total</b>	<b><u>100%</u></b>	<b><u>100%</u></b>
Interest rates on securities held for trading in HUF	1.9%-8%	1.9%-19.1%
Interest rates on securities held for trading in foreign currency	0.13%-10.8%	0%-8.9%
Average interest on securities held for trading	1.76%	1.34%

**NOTE 8: FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS (in HUF mn)  
[continued]**

Interest conditions and the remaining maturities of securities mandatorily measured at fair value through profit or loss are as follows:

	31 December 2025	31 December 2024
Non-interest bearing securities	<u>32,924</u>	<u>32,182</u>
<b>Total</b>	<b><u>32,924</u></b>	<b><u>32,182</u></b>
Securities mandatorily measured at fair value through profit or loss denominated in HUF	83%	78%
Securities mandatorily measured at fair value through profit or loss denominated in foreign currency	<u>17%</u>	<u>22%</u>
<b>Securities mandatorily measured at fair value through profit or loss total</b>	<b><u>100%</u></b>	<b><u>100%</u></b>

**NOTE 9: SECURITIES AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME (in HUF mn)**

	31 December 2025	31 December 2024
<b>Securities at fair value through other comprehensive income</b>		
Government bonds	922,110	185,171
Mortgage bonds	254,001	326,950
Interest bearing treasury bills	-	86
Other securities	45,403	46,461
<i>Listed securities</i>	<u>14,249</u>	<u>9,525</u>
<i>in foreign currency</i>	14,249	9,525
<i>Non-listed securities</i>	<u>31,154</u>	<u>36,936</u>
<i>in HUF</i>	6,751	10,331
<i>in foreign currency</i>	24,403	26,605
<b>Subtotal</b>	<b><u>1,221,514</u></b>	<b><u>558,668</u></b>
Non-trading equity instruments		
<i>Non-listed securities</i>	<u>43,929</u>	<u>33,934</u>
<i>in HUF</i>	528	528
<i>in foreign currency</i>	43,401	33,406
	<b><u>43,929</u></b>	<b><u>33,934</u></b>
<b>Securities at fair value through other comprehensive income total</b>	<b><u>1,265,443</u></b>	<b><u>592,602</u></b>

**NOTE 9: SECURITIES AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME (in HUF mn) [continued]**

Detailed information of the non-trading equity instruments to be measured at fair value through other comprehensive income:

Name	Currency	31 December 2025	31 December 2024
Garantiqa	HUF	392	392
Hage / Közvil / Pénzügykut	HUF	136	136
OBS	EUR	17,057	16,625
U Holdings	USD	9,853	-
VISA A Preferred	USD	10,452	10,312
VISA C Common	USD	<u>6,039</u>	<u>6,469</u>
		<b><u>43,929</u></b>	<b><u>33,934</u></b>

Interest conditions and the remaining maturities of FVOCI securities can be analysed as follows:

	31 December 2025	31 December 2024
Within one year:		
variable interest	1,101	196
fixed interest	<u>88,795</u>	<u>91,521</u>
	<b><u>89,896</u></b>	<b><u>91,717</u></b>
Over one year:		
variable interest	314,632	122,473
fixed interest	<u>816,986</u>	<u>344,478</u>
	<b><u>1,131,618</u></b>	<b><u>466,951</u></b>
Non-interest bearing securities	<u>43,929</u>	<u>33,934</u>
<b>Total</b>	<b><u>1,265,443</u></b>	<b><u>592,602</u></b>
	<b>31 December 2025</b>	<b>31 December 2024</b>
FVOCI securities denominated in HUF	91%	78%
FVOCI securities denominated in foreign currency	<u>9%</u>	<u>22%</u>
<b>FVOCI securities total</b>	<b><u>100%</u></b>	<b><u>100%</u></b>
Interest rates on FVOCI securities denominated in HUF	1.25%-9.1%	0.25%-11%
Interest rates on FVOCI securities denominated in foreign currency	1.1%-12.75%	0%-12.75%
Average interest on FVOCI securities	5.65%	5.44%

Certain fixed-rate mortgage bonds and other securities are hedged against interest rate risk. (See Note 45.4.)

	31 December 2025	31 December 2024
Net gain / (loss) reclassified from other comprehensive income to statement of profit or loss	9,585	2,875
Fair value of the hedged securities:		
Government bonds	504,240	144,218
Other bonds	=	<u>4,002</u>
	<b><u>504,240</u></b>	<b><u>148,220</u></b>

During the year ended 31 December 2024 and 2025 the Bank didn't sell any of equity instruments designated to measure at fair value through other comprehensive income.

**NOTE 10: SECURITIES AT AMORTISED COST (in HUF mn)**

	31 December 2025	31 December 2024
Government bonds	3,019,900	2,904,452
Other bonds	347,967	345,418
Treasury bills	-	93,259
Mortgage bonds	30,109	29,927
<b>Subtotal</b>	<b><u>3,397,976</u></b>	<b><u>3,373,056</u></b>
Loss allowance	(29,889)	(38,911)
<b>Total</b>	<b><u>3,368,087</u></b>	<b><u>3,334,145</u></b>

Interest conditions and the remaining maturities of securities at amortised cost can be analysed as follows:

	31 December 2025	31 December 2024
Within one year:		
variable interest	5,041	-
fixed interest	<u>818,082</u>	<u>518,374</u>
	<b><u>823,123</u></b>	<b><u>518,374</u></b>
Over one year:		
variable interest	49,708	24,824
fixed interest	<u>2,525,145</u>	<u>2,829,858</u>
	<b><u>2,574,853</u></b>	<b><u>2,854,682</u></b>
<b>Total</b>	<b><u>3,397,976</u></b>	<b><u>3,373,056</u></b>

The distribution of the securities at amortised cost by currency (%):

	31 December 2025	31 December 2024
Securities at amortised cost denominated in HUF	77%	72%
Securities at amortised cost denominated in foreign currency	<u>23%</u>	<u>28%</u>
<b>Securities at amortised cost total</b>	<b><u>100%</u></b>	<b><u>100%</u></b>
Interest rates on securities at amortised cost	0.1%-12.75%	0.1%-12.75%
Average interest on securities at amortised cost denominated in HUF	4.18%	4.62%

An analysis of change in the loss allowance on securities at amortised cost:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>38,911</b>	<b>26,225</b>
Loss allowance	9,922	22,001
Release of loss allowance	(14,995)	(11,433)
FX movement	<u>(3,949)</u>	<u>2,118</u>
<b>Closing balance</b>	<b><u>29,889</u></b>	<b><u>38,911</u></b>

**NOTE 11: LOANS (in HUF mn)****Loans measured at fair value through profit or loss**

	31 December 2025	31 December 2024
Within one year	62,743	45,362
Over one year	<u>1,019,945</u>	<u>953,048</u>
<b>Loans measured at fair value through profit or loss total</b>	<b><u>1,082,688</u></b>	<b><u>998,410</u></b>

Loans measured at fair value through profit or loss are mandatorily measured at fair value through profit or loss.

**Loans measured at amortised cost, net of allowance for loan losses**

	31 December 2025	31 December 2024
Within one year	2,472,992	2,415,594
Over one year	<u>2,796,548</u>	<u>2,399,947</u>
<b>Loans at amortised cost gross total</b>	<b><u>5,269,540</u></b>	<b><u>4,815,541</u></b>
Loss allowance on loan losses	<u>(134,216)</u>	<u>(144,746)</u>
<b>Loans at amortised cost total</b>	<b><u>5,135,324</u></b>	<b><u>4,670,795</u></b>

An analysis of the loan portfolio by currency (%):

	31 December 2025	31 December 2024
In HUF	63%	64%
In foreign currency	<u>37%</u>	<u>36%</u>
<b>Total</b>	<b><u>100%</u></b>	<b><u>100%</u></b>

Interest rates of the loan portfolio mandatorily measured at fair value through profit or loss are as follows (%):

	31 December 2025	31 December 2024
Loans denominated in HUF	2.82%-18.83%	3.1%-18.83%
Average interest on loans denominated in HUF	7.55%	6.30%

Interest rates of the loan portfolio measured at amortised cost are as follows (%):

	31 December 2025	31 December 2024
Loans denominated in HUF	0%-42%	0%-42%
Loans denominated in foreign currency	0%-21.21%	0%-21.21%
Average interest on loans denominated in HUF	11.27%	11.83%
Average interest on loans denominated in foreign currency	4.29%	5.71%

**NOTE 11: LOANS (in HUF mn) [continued]**

For an analysis of the loan portfolio by stages, countries and rating categories please see Note 36.1.

An analysis of the change in the loss allowance on loans at amortised cost is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>144,746</b>	<b>147,415</b>
Loss allowance	207,836	266,410
Release of loss allowance	(194,646)	(238,441)
Use of loss allowance	(16,884)	(25,572)
Partial write-off	(3,237)	(8,065)
FX movement	<u>(3,599)</u>	<u>2,999</u>
<b>Closing balance</b>	<b><u>134,216</u></b>	<b><u>144,746</u></b>

The Bank sells non-performing loans without recourse at estimated fair value to a wholly owned subsidiary, OTP Factoring Ltd.

**NOTE 12: INVESTMENTS IN SUBSIDIARIES, ASSOCIATES, JOINT VENTURES AND OTHER INVESTMENTS (in HUF mn)**

	31 December 2025	31 December 2024
Investments in subsidiaries:		
Controlling interest	2,606,856	2,566,076
Other	<u>32,264</u>	<u>27,646</u>
<b>Subtotal</b>	<b><u>2,639,120</u></b>	<b><u>2,593,722</u></b>
Impairment loss	<u>(468,990)</u>	<u>(424,691)</u>
<b>Total</b>	<b><u>2,170,130</u></b>	<b><u>2,169,031</u></b>

Other investments contain certain securities accounted at cost.

**NOTE 12: INVESTMENTS IN SUBSIDIARIES, ASSOCIATES, JOINT VENTURES AND OTHER INVESTMENTS (in HUF mn) [continued]****Significant subsidiaries**

Investments in companies in which the Bank has a controlling interest (direct) are detailed below. All companies are incorporated in Hungary unless indicated otherwise:

	31 December 2025		31 December 2024	
	% Held (direct/ indirect)	Gross book value	% Held (direct/ indirect)	Gross book value
OTP Luxembourg S.à r.l.	100%	522,528	100%	534,873
OTP Bank JSC (Ukraine)	100%	311,390	100%	311,390
DSK Bank EAD (Bulgaria)	100%	280,722	100%	280,722
OTP banka Srbija akcionarsko drustvo Novi Sad (Serbia)	100%	262,759	100%	262,759
OTP banka Hrvatska d.d. (Croatia)	100%	205,553	100%	217,898
OTP Mortgage Bank Ltd.	100%	199,294	100%	199,294
Ipoteka Bank (Uzbekistan)	80%	114,218	80%	110,973
Balanz Private Open-end Investment Fund	100%	39,955	100%	86,795
JSC "OTP Bank" (Russia)	98%	87,945	98%	74,337
Crnogorska komercijalna banka a.d. (Montenegro)	100%	72,784	100%	72,784
Mendota Invest, Nepremicninska druzba, d.o.o.	100%	65,472	-	-
OOO AlyansReserv (Russia)	100%	50,074	100%	50,074
Air-Invest Llc.	100%	49,248	100%	49,248
Bank Center No. 1. Ltd.	100%	43,955	100%	43,955
PortfoLion Green Venture Capital Fund	100%	37,500	100%	33,571
Other		<u>263,459</u>		<u>237,403</u>
<b>Total</b>		<b><u>2,606,856</u></b>		<b><u>2,566,076</u></b>

An analysis of the change in the impairment loss is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>424,691</b>	<b>418,115</b>
Impairment loss for the period	47,979	13,517
Reversal of impairment loss	(3,680)	(2,430)
Use of impairment loss	=	(4,511)
<b>Closing balance</b>	<b><u>468,990</u></b>	<b><u>424,691</u></b>

The Bank decided that the recoverable amount is determined based on fair value less cost of disposal. The Bank prepared impairment tests of the subsidiaries based on two different net present value calculation methods that show the same result; however they represent different economical logics. On one hand is the discount cash flow method (“DCF”) that calculates the value of the subsidiaries by discounting their expected cash flow; on the other hand the economic value added (“EVA”) method estimates the value of the subsidiaries from the initial invested capital and the present value of the economic profit that the companies are expected to generate in the future. Applying the EVA method was more practically than DCF method because it gives a more realistic picture about how the explicit period and the residual value can contribute to the value of the company.

The Bank, in its strategic plan, has taken into consideration the effects of the present global economic situation, the cautious recovery of economic situation and outlook, the associated risks and their possible effect on the financial sector as well as the current and expected availability of wholesale funding.

**NOTE 12: INVESTMENTS IN SUBSIDIARIES, ASSOCIATES, JOINT VENTURES AND OTHER INVESTMENTS (in HUF mn) [continued]**

An analysis of the impairment loss by significant subsidiaries is as follows:

	31 December 2025	31 December 2024
OTP Bank JSC (Ukraine)	280,763	280,763
OTP Mortgage Bank Ltd.	83,557	83,557
LLC Alliance Reserve (Russia)	21,256	15,801
Monicomp Ltd.	13,761	13,173
Air-Invest Ltd.	10,965	10,965
OTP Real Estate Ltd.	9,685	11,034
R.E. Four d.o.o. (Serbia)	3,763	3,763
JSC "OTP Bank" (Russia)	<u>27,773</u>	<u>2,775</u>
<b>Total</b>	<b><u>451,523</u></b>	<b><u>421,831</u></b>

Dividend income from significant subsidiaries and shares held-for-trading and shares measured at fair value through other comprehensive income is as follows:

	31 December 2025	31 December 2024
DSK Bank EAD (Bulgaria)	99,519	112,908
OTP Luxembourg S.à r.l.	95,089	45,686
JSC "OTP Bank" (Russia)	57,956	54,057
OTP banka Srbija akcionarsko drustvo Novi Sad (Serbia)	34,517	26,822
OTP banka dioničko društvo (Croatia)	32,152	29,687
OTP Funds Servicing and Consulting Ltd.	23,019	5,162
OTP Holding Malta Ltd. (Malta)	21,079	20,904
LLC Alliance Reserve (Russia)	11,129	31,664
OTP Bank S.A. (Moldova)	7,959	10,258
Crnogorska komercijalna banka a.d. (Montenegro)	-	23,295
OTP banka d.d. (Slovenia)	-	12,288
OTP Factoring Ltd.	-	6,000
Other	<u>18,413</u>	<u>24,112</u>
<b>Subtotal</b>	<b><u>400,832</u></b>	<b><u>402,843</u></b>
Dividend from shares held-for-trading	11,078	10,060
Dividend from securities mandatorily at fair value through profit or loss	9	15
Dividend from shares fair value through other comprehensive income	<u>405</u>	<u>344</u>
<b>Total</b>	<b><u>412,324</u></b>	<b><u>413,262</u></b>

**NOTE 12: INVESTMENTS IN SUBSIDIARIES, ASSOCIATES, JOINT VENTURES AND OTHER INVESTMENTS (in HUF mn) [continued]****Significant associates and joint ventures**

The associated entities that are owned through venture capital funds are not detailed below neither for year 2025 nor for 2024, only the funds that own them are presented below. PortfoLion funds are subsidiaries in the separate financial statements.

Summarized financial and non-financial information of associates which are accounted according to IAS 28 and in line with IFRS 9 as at 31 December 2025 is as follows:

List of associated entities (amounts in HUF million)	Carrying amount	Shareholder's equity	Share capital	Profit after tax	Voting right	Country / Headquarter	Activity
PortfoLion Digital Venture Capital Fund I.	22,197	18,662	7,000	(2,472)	100.00%	Hungary /Budapest	Digital technology, solutions that strengthen the bank's innovation capacity (e.g. big data, financial software, payment solutions, blockchain etc.).
PortfoLion Regional Venture Capital Fund II.	17,200	20,671	20,566	2,439	49.88%	Hungary /Budapest	Investment in any industries and sectors, due to which international expansion of Hungarian enterprises can be realized.
PortfoLion Partner Venture Capital Fund	23,413	90,699	72,004	(5,145)	30.56%	Hungary /Budapest	Financing of domestic or foreign takeover, capital increase or merger in which the acquiring company is at least majority-owned by Hungarians.
PortfoLion Digital Venture Capital Fund II.	7,507	7,579	8,440	(395)	100.00%	Hungary /Budapest	IT, digital technology, fintech
PortfoLion Green Venture Capital Fund	14	39,310	37,500	83	100.00%	Hungary /Budapest	Investing in companies engaged in agricultural activities, as well as in food processing and agriculture-related areas.
PortfoLion Agricultural Venture Capital Fund II	-	3,982	4,000	(18)	100.00%	Hungary /Budapest	Investing in companies engaged in agricultural activities, as well as in food processing and agriculture-related areas.
<b>Subtotal</b>	<b><u>70,331</u></b>						
D-ÉG Thermoset Ltd 'u.l.'	-	n.a.	1,045	n.a.	46.99%	Hungary / Dunaújváros	Wholesale of hardware, plumbing and heating equipment and supplies
Company for Cash Services AD	392	4,650	2,463	709	25.00%	Bulgaria / Sofia	Other financial service activities, except insurance and pension funding
Bankart Procesiranje Placilnih Instrumentov d.o.o.	<u>7,219</u>	10,267	771	<u>1,208</u>	43.06%	Slovenia / Ljubjana	Data processing, web hosting services
<b>Subtotal</b>	<b><u>7,611</u></b>						
<b>Total</b>	<b><u>77,942</u></b>						

There are no material investments in associates owned by equity funds below 50% voting right and without control.

**NOTE 12: INVESTMENTS IN SUBSIDIARIES, ASSOCIATES, JOINT VENTURES AND OTHER INVESTMENTS (in HUF mn) [continued]**

**Significant associates and joint ventures [continued]**

Summarized financial and non-financial information of associates which are accounted according to IAS 28 and in line with IFRS 9 as at 31 December 2024 is as follows:

List of associated entities (amounts in HUF million)	Carrying amount	Shareholder's equity	Share capital	Profit after tax	Voting right	Country / Headquarter	Activity
PortfoLion Digital Venture Capital Fund I.	15,593	14,179	7,000	(7,479)	100.00%	Hungary /Budapest	Digital technology, solutions that strengthen the bank's innovation capacity (e.g. big data, financial software, payment solutions, blockchain etc.).
PortfoLion Regional Venture Capital Fund II.	15,672	15,511	17,847	(472)	49.88%	Hungary /Budapest	Investment in any industries and sectors, due to which international expansion of Hungarian enterprises can be realized.
PortfoLion Partner Venture Capital Fund	30,661	70,262	60,421	5,031	30.56%	Hungary /Budapest	Financing of domestic or foreign takeover, capital increase or merger in which the acquiring company is at least majority-owned by Hungarians.
PortfoLion Digital Venture Capital Fund II.	6,374	6,516	7,270	(687)	100.00%	Hungary /Budapest	IT, digital technology, fintech
PortfoLion Green Venture Capital Fund	11	35,298	33,571	234	100.00%	Hungary /Budapest	Investing in companies engaged in agricultural activities, as well as in food processing and agriculture-related areas.
<b>Subtotal</b>	<b><u>68,311</u></b>						
OTP-DayOne Magvető Fund	648	2,947	1,271	23	22.00%	Hungary /Budapest	Trusts, funds and similar financial entities
D-ÉG Thermoset Ltd 'u.l.'	-	n.a.	1,045	n.a.	46.99%	Hungary / Dunaújváros	Wholesale of hardware, plumbing and heating equipment and supplies
Company for Cash Services AD	392	4,319	1,982	(333)	25.00%	Bulgaria / Sofia	Other financial service activities, except insurance and pension funding
Bankart Procesiranje Placilnih Instrumentov d.o.o.	7,219	11,403	658	1,182	43.06%	Ljubjana / Slovenia	Data processing, web hosting services
<b>Subtotal</b>	<b><u>8,259</u></b>						
<b>Total</b>	<b><u>76,570</u></b>						

**NOTE 12: INVESTMENTS IN SUBSIDIARIES, ASSOCIATES, JOINT VENTURES AND OTHER INVESTMENTS (in HUF mn) [continued]****Significant events related to investments**

The financial closing of the transaction has been completed on the basis of the sale and purchase agreement signed with Balanz Zártkörű Nyíltvégű Intézményi Ingatlan Alap on 4 September 2025, as a result of which the direct 100% stake of Balanz Private Open-end Investment Fund in Mendota Invest Nemreimicninska Druzba d.o.o. has become the property of OTP Bank Plc

OTP Bank has signed a sale and purchase agreement with SMP Solutions Plc. on 5 December 2025 regarding its directly held 100% ownership stake in OTP Card Factory Ltd. Parallely, the financial closing of the transaction has been completed and as a result, the ownership of OTP Card Factory Ltd. has been transferred to SMP Solutions Plc.

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn)**

For the year ended 31 December 2025

	Intangible assets	Property	Office equipment and vehicles	Vehicles	Construction in progress	Right of use assets	Total
<b>Cost</b>							
Balance as at 1 January	335,424	96,080	132,024	442	10,136	87,120	661,226
Additions	97,601	13,751	17,687	200	32,850	6,274	168,363
Disposals	(31,126)	(5,462)	(10,076)	(39)	(30,140)	2,942	(73,901)
Closing balance	<u>401,899</u>	<u>104,369</u>	<u>139,635</u>	<u>603</u>	<u>12,846</u>	<u>96,336</u>	<u>755,688</u>
<b>Depreciation and Amortization</b>							
Balance as at 1 January	197,520	35,964	90,792	154	-	28,164	352,594
Charge for the year	44,123	5,523	16,425	86	-	9,965	76,122
Disposals	(30,569)	(2,357)	(9,433)	(32)	-	(709)	(43,100)
Closing balance	<u>211,074</u>	<u>39,130</u>	<u>97,784</u>	<u>208</u>	=	<u>37,420</u>	<u>385,616</u>
<b>Impairment</b>							
Balance as at 1 January	44	-	-	-	-	-	44
Charge for the year	-	-	-	-	-	-	-
Disposals	(44)	-	-	-	-	-	(44)
Closing balance	=	=	=	=	=	=	=
<b>Net book value</b>							
Balance as at 1 January	<u>137,904</u>	<u>60,116</u>	<u>41,232</u>	<u>288</u>	<u>10,136</u>	<u>58,956</u>	<u>308,632</u>
Closing balance	<u>190,825</u>	<u>65,239</u>	<u>41,851</u>	<u>395</u>	<u>12,846</u>	<u>58,916</u>	<u>370,072</u>

For the year ended 31 December 2024

	Intangible assets	Property	Office equipment and vehicles	Vehicles	Construction in progress	Right of use assets	Total
<b>Cost</b>							
Balance as at 1 January	261,854	85,918	115,814	338	19,629	86,654	570,207
Additions	75,795	11,211	23,278	104	25,309	487	136,184
Disposals	(2,225)	(1,049)	(7,068)	-	(34,802)	(21)	(45,165)
Closing balance	<u>335,424</u>	<u>96,080</u>	<u>132,024</u>	<u>442</u>	<u>10,136</u>	<u>87,120</u>	<u>661,226</u>
<b>Depreciation and Amortization</b>							
Balance as at 1 January	163,739	31,978	82,319	96	-	20,432	298,564
Charge for the year	34,024	4,630	15,297	58	-	9,542	63,551
Disposals	(243)	(644)	(6,824)	-	-	(1,810)	(9,521)
Closing balance	<u>197,520</u>	<u>35,964</u>	<u>90,792</u>	<u>154</u>	=	<u>28,164</u>	<u>352,594</u>
<b>Impairment</b>							
Balance as at 1 January	-	-	-	-	-	-	-
Charge for the year	1,326	-	-	-	-	-	1,326
Disposals	(1,282)	-	-	-	-	-	(1,282)
Closing balance	<u>44</u>	=	=	=	=	=	<u>44</u>
<b>Net book value</b>							
Balance as at 1 January	<u>98,115</u>	<u>53,940</u>	<u>33,495</u>	<u>242</u>	<u>19,629</u>	<u>66,222</u>	<u>271,643</u>
Closing balance	<u>137,860</u>	<u>60,116</u>	<u>41,232</u>	<u>288</u>	<u>10,136</u>	<u>58,956</u>	<u>308,588</u>

The Bank has no intangible assets with indefinite useful life.

**NOTE 14: INVESTMENT PROPERTIES (in HUF mn)**

For the year ended 31 December 2025 and for the year ended 31 December 2024

	31 December 2025	31 December 2024
<b>Property</b>		
<b>Cost</b>		
Balance as at 1 January	5,337	5,165
Additions result from subsequent expenditure	266	172
<b>Closing balance</b>	<b><u>5,603</u></b>	<b><u>5,337</u></b>
<b>Depreciation and Amortization</b>		
Balance as at 1 January	1,110	962
Charge for the period	161	148
<b>Closing balance</b>	<b><u>1,271</u></b>	<b><u>1,110</u></b>
<b>Net book value</b>		
Balance as at 1 January	<u>4,227</u>	<u>4,203</u>
<b>Closing balance</b>	<b><u>4,332</u></b>	<b><u>4,227</u></b>

According to the opinion of the Management there is no significant difference between the fair value and the carrying value of these properties.

<b>Income and Expenses</b>	31 December 2025	31 December 2024
Rental income	7	9
Depreciation	161	149

**NOTE 15: FAIR VALUE OF DERIVATIVE FINANCIAL ASSETS DESIGNATED AS HEDGE ACCOUNTING (in HUF mn)**

Positive fair value of derivative financial assets designated as hedge accounting:

	31 December 2025	31 December 2024
Interest rate swaps designated as fair value hedge	29,962	37,679
CCIRS designated as fair value hedge	2,575	13,903
Interest rate swaps designated as cash flow hedge	(5,438)	(8,452)
<b>Total</b>	<b><u>27,099</u></b>	<b><u>43,130</u></b>

**NOTE 16: OTHER ASSETS (in HUF mn)**

	31 December 2025	31 December 2024
<b>Other financial assets</b>		
Settlement account related to Remuneration Policy	173,730	145,966
Prepayments and accrued income	40,630	28,993
Receivables from investment services	30,522	43,346
Stock exchange deposit	25,216	27,239
Trade receivables	15,982	14,713
Receivables from card operations	17,007	16,586
Receivables from suppliers	5,315	6,057
Other	<u>18,019</u>	<u>10,197</u>
	<b><u>326,421</u></b>	<b><u>293,097</u></b>
Loss allowance	<u>(21,460)</u>	<u>(11,522)</u>
<b>Other financial assets total</b>	<b><u>304,961</u></b>	<b><u>281,575</u></b>
<b>Other non-financial assets</b>		
Prepayments and accrued income	56,056	53,030
Receivable related to Hungarian Government subsidies	10,908	12,562
Other	<u>11,773</u>	<u>10,506</u>
	<b><u>78,737</u></b>	<b><u>76,098</u></b>
Provision for impairment on other assets	(521)	(578)
<b>Other non-financial assets total</b>	<b><u>78,216</u></b>	<b><u>75,520</u></b>
<b>Total</b>	<b><u>383,177</u></b>	<b><u>357,095</u></b>

An analysis of the movement in the loss allowance on other financial assets is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>11,522</b>	<b>7,875</b>
Charge for the period	18,348	10,616
Release of loss allowance	(6,543)	(6,132)
Use of loss allowance	(1,285)	(1,242)
FX movement	(742)	405
Other movement	<u>160</u>	-
<b>Closing balance</b>	<b><u>21,460</u></b>	<b><u>11,522</u></b>

An analysis of the movement in the loss allowance on other non-financial assets is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>578</b>	<b>607</b>
Charge for the period	139	269
Release of provision	(151)	(329)
FX movement	<u>(45)</u>	<u>31</u>
<b>Closing balance</b>	<b><u>521</u></b>	<b><u>578</u></b>

**NOTE 17: AMOUNTS DUE TO BANKS AND DEPOSITS FROM THE NATIONAL BANK OF HUNGARY AND OTHER BANKS (in HUF mn)**

	31 December 2025	31 December 2024
Within one year:		
In HUF	445,080	495,497
In foreign currency	<u>772,142</u>	<u>521,986</u>
	<b><u>1,217,222</u></b>	<b><u>1,017,483</u></b>
Over one year:		
In HUF	160,299	381,129
In foreign currency	<u>278,846</u>	<u>208,357</u>
	<b><u>439,145</u></b>	<b><u>589,486</u></b>
<b>Subtotal</b>	<b><u>1,656,367</u></b>	<b><u>1,606,969</u></b>
<b>Total</b>	<b><u>1,656,367</u></b>	<b><u>1,606,969</u></b>

Interest rates on amounts due to banks and deposits from the NBH and other banks are as follows (%):

	31 December 2025	31 December 2024
Within one year:		
In HUF	-1.2%-7.4%	0%-9.23%
In foreign currency	-1.81%-4.35%	-2.02%-7.18%
Over one year:		
In HUF	-1.34%-3.5%	-1.34%-6.49%
In foreign currency	-2%-4.4%	-2%-4.35%
Average interest on amounts due to banks in HUF	4.85%	4.89%
Average interest on amounts due to banks in foreign currency	2.70%	3.73%

**NOTE 18: REPO LIABILITIES (in HUF mn)**

	31 December 2025	31 December 2024
Within one year:		
In HUF	196,860	61,824
In foreign currency	<u>133,144</u>	<u>129,990</u>
	<b><u>330,004</u></b>	<b><u>191,814</u></b>
Over one year:		
In foreign currency	<u>47,528</u>	<u>35,818</u>
	<b><u>47,528</u></b>	<b><u>35,818</u></b>
<b>Subtotal</b>	<b><u>377,532</u></b>	<b><u>227,632</u></b>
<b>Total</b>	<b><u>377,532</u></b>	<b><u>227,632</u></b>

Interest rates on repo liabilities are as follows (%):

	31 December 2025	31 December 2024
Within one year:		
In HUF	5.4%-6.5%	-4.5%-6.76%
In foreign currency	0.97%-5.11%	1.46%-5.92%
Over one year:		
In foreign currency	2.07%-4.56%	3.97%-5.11%
Average interest on repo liabilities in HUF	6.45%	8.06%
Average interest on repo liabilities in foreign currency	2.47%	3.60%

**NOTE 19: DEPOSITS FROM CUSTOMERS (in HUF mn)**

	31 December 2025	31 December 2024
Within one year:		
In HUF	9,003,907	8,608,098
In foreign currency	<u>2,358,812</u>	<u>2,264,025</u>
	<b><u>11,362,719</u></b>	<b><u>10,872,123</u></b>
Over one year:		
In HUF	29,479	24,104
	<b><u>29,479</u></b>	<b><u>24,104</u></b>
<b>Total</b>	<b><u>11,392,198</u></b>	<b><u>10,896,227</u></b>

Interest rates on deposits from customers are as follows (%):

	31 December 2025	31 December 2024
Within one year:		
In HUF	-0.2%-30%	0%-11.25%
In foreign currency	-8.04%-27%	-0.85%-36%
Over one year:		
In HUF	0%-11.25%	0%-6.03%
In foreign currency	0%	0%
Average interest on deposits from customers in HUF	1.99%	1.99%
Average interest on deposits from customers in foreign currency	1.40%	1.40%

An analysis of deposits from customers by type, not including accrued interest, is as follows:

	31 December 2025		31 December 2024	
Household deposits	5,459,790	48%	5,024,279	46%
Deposits to medium and large corporates	5,278,623	46%	5,032,072	46%
Municipality deposits	<u>653,785</u>	<u>6%</u>	<u>839,876</u>	<u>8%</u>
<b>Total</b>	<b><u>11,392,198</u></b>	<b><u>100%</u></b>	<b><u>10,896,227</u></b>	<b><u>100%</u></b>

**NOTE 20: LIABILITIES FROM ISSUED SECURITIES (in HUF mn)**

	31 December 2025	31 December 2024
Within one year:		
In HUF	147,373	83,693
In foreign currency	<u>26,007</u>	<u>46,521</u>
	<b><u>173,380</u></b>	<b><u>130,214</u></b>
Over one year:		
In HUF	155	12,226
In foreign currency	<u>1,167,715</u>	<u>1,608,453</u>
	<b><u>1,167,870</u></b>	<b><u>1,620,679</u></b>
<b>Total</b>	<b><u>1,341,250</u></b>	<b><u>1,750,893</u></b>

Interest rates on liabilities from issued securities are as follows (%):

	31 December 2025	31 December 2024
Issued securities denominated in HUF	6%-7.4%	5.5%-12%
Issued securities denominated in foreign currency	3.5%-7.5%	4.1%-8.1%
Average interest on issued securities denominated in HUF	5.88%	9.85%
Average interest on issued securities denominated in foreign	5.38%	6.10%

**Term Note Program in the value of HUF 800 billion for the year of 2025/2026**

On 8 April 2025 the Bank initiated term note program in the value of HUF 800 billion with the intention of issuing registered dematerialized bonds in public. The NBH approved on 11 July 2025 the prospectus of Term Note Program. The prospectus is valid for 12 months following the disclosure. At the same time Term Note Program for the year 2024/2025 was closed, which was originally valid till 18 July 2025.

**Term Note Program in the value of HUF 800 billion for the year of 2024/2025**

On 30 April 2024 the Bank initiated term note program in the value of HUF 800 billion with the intention of issuing registered dematerialized bonds in public. The NBH approved on 19 July 2024 the prospectus of Term Note Program. The prospectus is valid for 12 months following the disclosure. At the same time Term Note Program for the year 2023/2024 was closed, which was originally valid till 7 August 2024.

**Term Note Program about issued securities denominated in foreign currency are detailed below:**

Types of Notes and Issuers	ISIN	Date of issuance	Type of Fx	Nominal value (Fx million)	Stock Exchange	Moody's	Scope Ratings GmbH	S&P
<b>OTP Bank Plc.</b>								
Senior Preferred Notes	XS2754491640	31/01/2024	EUR	600	Luxembourg	Baa3	BBB+	--
Green Senior Preferred Notes	XS2838495542	12/06/2024	EUR	700	Luxembourg	--	BBB+	BBB-
Senior Preferred Notes	XS2871018136	31/07/2024	CNY	300	Luxembourg	--	BBB+	--
Senior Preferred Notes	XS2917468618	16/10/2024	EUR	500	Luxembourg	Baa3	BBB+	--
Green Senior Preferred Notes	XS3102027383	30/06/2025	CNY	900	Luxembourg	--	BBB+	--

**NOTE 20: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]**

<b>Redemptions Types of Notes and Issuers</b>	<b>ISIN</b>	<b>Date of redemption</b>	<b>Type of Fx</b>	<b>Nominal value (Fx million)</b>	<b>Originally was due in</b>
<b>OTP Bank Plc.</b>					
Senior Preferred Notes	XS2703264635	13/10/2025	RON	170	2026
Senior Preferred Notes	XS2560693181	04/03/2025	EUR	650	2026
Senior Non-Preferred Notes	XS2737630314	22/06/2025	EUR	75	2026
Senior Non-Preferred Notes	XS2642536671	27/06/2025	EUR	110	2026
Green Notes	XS2536446649	29/09/2025	USD	60	2026

**Hedge accounting of issued bonds**

Certain issued structured securities are hedged by the Bank with interest rate swaps (“IRS”) which exchange the fixed and floating interest rate with the interest rate of the securities between the parties at a notional amount that equals the nominal amount of the hedged securities. These are considered as fair value hedge relationships as they cover the interest rate risk arising from the coupons of the hedged securities. OTP Bank does not intend to be exposed to the risk embedded in the structured bonds, consequently as part of interest rate swap transaction the structured interest payments are swapped to floating interest rate.

This hedging relationship meets all of the following hedge effectiveness requirements:

- there is an economic relationship between the hedged item and the hedging instrument
- the effect of credit risk does not dominate the value changes that result from that economic relationship
- the hedge ratio of the hedging relationship is the same as that resulting from the quantity of the hedged item that the Bank actually hedges and the quantity of the hedging instrument that the Bank actually uses to hedge that quantity of hedged item

The cash flows of the fixed rate securities issued by the Bank are exposed to the changes in the HUF/EUR and HUF/USD foreign exchange rates and the volatility of the quoted interest rates of EUR and USD. The interest rate risk and foreign exchange risk related to these securities are hedged with EUR and USD IRS transactions, where the fixed interests were swapped to payments linked to 6-month BUBOR and EURIBOR and to floating interest rate based on USD overnight SOFR (“secured overnight financing rate”), resulting in a decrease in the interest rate and foreign exchange exposure of issued securities.

**NOTE 20: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]**

Issued securities denominated in foreign currency as at 31 December 2025

	Name	Date of issuance	Maturity	Currency	Nominal value in FX million	Nominal value in HUF	Amortised cost in FX million	Amortised cost in HUF million	Interest conditions (in % actual)	Hedged
1	XS2838495542	2024.06.12	2028.06.12	EUR	699	269,317	725	279,384	fixed 4.75	hedged
2	XS2698603326	2023.10.05	2027.10.05	EUR	648	249,612	664	256,054	fixed 6.13	hedged
3	XS2754491640	2024.01.31	2029.01.31	EUR	598	230,534	631	243,169	fixed 5.00	hedged
4	XS2917468618	2024.10.16	2030.10.16	EUR	498	191,929	499	192,481	fixed 4.25	hedged
5	XS2626773381	2023.05.25	2027.05.25	USD	499	163,869	503	165,316	fixed 7.50	hedged
6	XS3102027383	2025.06.30	2028.06.30	CNY	900	42,291	915	42,980	fixed 3.50	
7	XS2871018136	2024.07.31	2027.07.31	CNY	300	14,097	305	14,338	fixed 4.10	
	<b>Subtotal issued securities in foreign currency</b>					<b><u>1,161,649</u></b>		<b><u>1,193,722</u></b>		

Issued securities denominated in foreign currency as at 31 December 2024

	Name	Date of issuance	Maturity	Currency	Nominal value in FX million	Nominal value in HUF	Amortised cost in FX million	Amortised cost in HUF million	Interest conditions (in % actual)	Hedged
1	XS2871018136	2024.07.31	2027.07.31	CNY	300	16,176	305	16,443	fixed 4.10	
2	XS2560693181	2022.12.01	2026.03.04	EUR	648	265,938	689	282,387	fixed 7.35	
3	XS2642536671	2023.06.27	2026.06.27	EUR	110	45,110	114	46,871	fixed 7.50	
4	XS2698603326	2023.10.05	2027.10.05	EUR	649	266,321	674	276,203	fixed 6.13	hedged
5	XS2737630314	2023.12.22	2026.06.22	EUR	75	30,757	78	31,845	fixed 6.10	hedged
6	XS2754491640	2024.01.31	2029.01.31	EUR	598	245,420	634	260,169	fixed 5.00	hedged
7	XS2838495542	2024.06.12	2028.06.12	EUR	698	286,058	729	298,861	fixed 4.75	hedged
8	XS2917468618	2024.10.16	2030.10.16	EUR	499	204,680	504	206,807	fixed 4.25	hedged
9	XS2703264635	2023.10.13	2026.10.13	RON	170	14,011	173	14,279	variable 8.10	hedged
10	XS2536446649	2022.09.29	2026.09.29	USD	60	23,616	61	24,063	fixed 7.25	
11	XS2626773381	2023.05.25	2027.05.25	USD	500	<u>196,689</u>	501	<u>197,046</u>	fixed 7.50	hedged
	<b>Subtotal issued securities in foreign currency</b>					<b><u>1,594,776</u></b>		<b><u>1,654,974</u></b>		

**NOTE 20: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]**

Issued securities denominated in HUF as at 31 December 2025

	Name	Date of issuance	Maturity	Nominal value in HUF million	Amortised cost in HUF million	Interest conditions	Hedged
1	OTP_HUF_2026/7	2025.04.11	2026.04.11	17,132	17,893	fix 6.00	
2	OTP_HUF_2026/8	2025.05.09	2026.05.09	13,579	14,119	fix 6.00	
3	OTP_HUF_2026/9	2025.06.06	2026.06.06	12,530	12,971	fix 6.00	
4	OTP_HUF_2026/6	2025.03.14	2026.03.14	12,015	12,603	fix 6.00	
5	OTP_HUF_2026/14	2025.10.10	2026.10.10	11,703	11,872	fix 6.00	
6	OTP_HUF_2026/11	2025.07.16	2026.07.16	11,302	11,626	fix 6.00	
7	OTP_HUF_2026/3	2025.01.17	2026.01.17	10,728	11,352	fix 6.00	
8	OTP_HUF_2026/12	2025.08.15	2026.08.15	10,399	10,645	fix 6.00	
9	OTP_HUF_2026/10	2025.06.27	2026.06.27	7,638	7,880	fix 6.00	
10	OTP_HUF_2026/16	2025.11.21	2026.11.21	7,469	7,526	fix 6.00	
11	OTP_HUF_2026/13	2025.09.12	2026.09.12	6,786	6,915	fix 6.00	
12	OTP_HUF26/17	2025.12.12	2026.12.12	6,754	6,782	fix 6.00	
13	OTP_HUF_2026/15	2025.10.31	2026.10.31	5,164	5,221	fix 6.00	
14	OTP_HUF_2026/5	2025.02.14	2026.02.14	4,713	4,965	fix 6.00	
15	OTP_HUF_2026/4	2025.01.31	2026.01.31	4,023	4,248	fix 6.00	
16	OTP_HUF_2026/2	2023.12.15	2026.12.15	551	553	fix 7.40	
17	OTP_TBSZ_HUF_2028/1	2023.10.13	2028.12.15	155	156	fix 6.96	
22	Other			<u>201</u>	<u>201</u>		
	<b>Subtotal issued securities in HUF</b>			<b><u>142,842</u></b>	<b><u>147,528</u></b>		
	<b>Total</b>			<b><u>1,304,491</u></b>	<b><u>1,341,250</u></b>		

**NOTE 20: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]**

Issued securities denominated in HUF as at 31 December 2024

	Name	Date of issuance	Maturity	Nominal value in HUF million	Amortised cost in HUF million	Interest conditions	Hedged
1	OTP_HUF_2026/1	2022.12.22	2026.01.05	10,228	12,674	fix 12.00	hedged
2	OTP_TBSZ_HUF_2028/1	2023.10.13	2028.12.15	155	156	fix 6.88	
3	OTP_HUF_2026/2	2023.12.15	2026.12.15	620	622	fix 7.40	
4	OTP_HUF_2025/3	2024.01.12	2025.01.12	1,919	2,060	fix 7.50	
5	OTP_HUF_2025/4	2024.02.02	2025.02.02	2,155	2,289	fix 6.75	
6	OTP_HUF_2025/5	2024.03.01	2025.03.01	5,957	6,284	fix 6.50	
7	OTP_HUF_2025/6	2024.03.28	2025.03.28	5,559	5,837	fix 6.50	
8	OTP_HUF_2025/7	2024.04.26	2025.04.26	8,190	8,528	fix 6.00	
9	OTP_HUF_2025/8	2024.05.24	2025.05.24	5,860	6,075	fix 6.00	
10	OTP_HUF_2025/9	2024.06.07	2025.06.07	5,756	5,955	fix 6.00	
11	OTP_HUF_2025/10	2024.07.05	2025.07.05	11,675	12,024	fix 6.00	
12	OTP_HUF_2025/11	2024.08.02	2025.08.02	6,698	6,868	fix 6.00	
13	OTP_HUF_2025/12	2024.08.30	2025.08.30	4,532	4,618	fix 5.50	
14	OTP_HUF_2025/13	2024.09.27	2025.09.27	5,162	5,239	fix 5.50	
15	OTP_HUF_2025/14	2024.10.31	2025.10.31	5,826	5,883	fix 5.50	
16	OTP_HUF_2025/15	2024.11.29	2025.11.29	3,243	3,260	fix 5.50	
17	OTP_HUF_2025/16	2024.12.18	2025.12.18	7,324	7,343	fix 6.00	
	Other			<u>204</u>	<u>204</u>		
	<b>Subtotal issued securities in HUF</b>			<b><u>91,063</u></b>	<b><u>95,919</u></b>		
	<b>Total</b>			<b><u>1,685,839</u></b>	<b><u>1,750,893</u></b>		

**NOTE 21: FINANCIAL LIABILITIES DESIGNATED AS FAIR VALUE THROUGH PROFIT OR LOSS (in HUF mn)**

	31 December 2025	31 December 2024
Within one year:		
In HUF	<u>1,574</u>	<u>1,709</u>
	<b>1,574</b>	<b>1,709</b>
Over one year:		
In HUF	<u>13,705</u>	<u>15,315</u>
	<b>13,705</b>	<b>15,315</b>
<b>Total</b>	<b><u>15,279</u></b>	<b><u>17,024</u></b>
<i>Contractual amount outstanding</i>	15,482	17,000

Interest rates on financial liabilities designated as fair value through profit or loss are as follows (%):

	31 December 2025	31 December 2024
Within one year:		
In HUF	0.01%-4.59%	4.33%-8.24%
Over one year:		
In HUF	4.32%-5.27%	3.14%
Average interest on amounts due to banks in HUF	5.10%	7.30%

Certain MFB refinanced loan receivables are categorised as fair value through profit or loss based on SPPI test. Related refinancing loans at the liability side are categorised as fair value through profit or loss based on fair value option due to accounting mismatch as provided by the IFRS 9 standard.

**NOTE 22: HELD FOR TRADING DERIVATIVE FINANCIAL LIABILITIES (in HUF mn)**

Negative fair value of held for trading derivative financial liabilities by deal types:

	31 December 2025	31 December 2024
Interest rate swaps	31,492	52,672
Foreign currency swaps	38,707	57,644
CCIRS and mark-to-market CCIRS	5,221	11,627
Other derivative contracts	<u>18,602</u>	<u>22,556</u>
<b>Total</b>	<b><u>94,022</u></b>	<b><u>144,499</u></b>

**NOTE 23: FAIR VALUE OF DERIVATIVE FINANCIAL LIABILITIES DESIGNATED AS HEDGE ACCOUNTING (in HUF mn)**

Fair value of derivative financial liabilities designated as hedge accounting is detailed as follows:

	31 December 2025	31 December 2024
IRS designated as fair value hedge	2,797	18
CCIRS designated as fair value hedge	3,885	19,420
<b>Total</b>	<b><u>6,682</u></b>	<b><u>19,438</u></b>

**NOTE 24: OTHER LIABILITIES<sup>3</sup> AND PROVISIONS (in HUF mn)**

	31 December 2025	31 December 2024
<b>Other financial liabilities</b>		
Liabilities from investment services	72,897	149,317
Accrued expenses	33,019	26,341
Accounts payable	42,383	52,854
Liabilities due to short positions	85,566	47,157
Liabilities from customer's credit card payments	30,061	27,372
Other	<u>157,478</u>	<u>34,575</u>
<b>Other financial liabilities total</b>	<b><u>421,404</u></b>	<b><u>337,616</u></b>
<b>Other non-financial liabilities</b>		
Technical accounts	18,286	74,168
Current income tax payable	23,294	21,843
Social contribution	12,363	10,522
Accrued expenses	4,900	3,337
Other	<u>2,914</u>	<u>2,036</u>
<b>Other non-financial liabilities total</b>	<b><u>61,757</u></b>	<b><u>111,906</u></b>
<b>Other liabilities total</b>	<b><u>483,161</u></b>	<b><u>449,522</u></b>

The provision on other liabilities, off-balance sheet commitments and contingent liabilities are detailed as follows:

	31 December 2025	31 December 2024
Provision for losses on other off-balance sheet commitments and	19,415	19,054
<b>Provisions in accordance with IFRS 9</b>	<b><u>19,415</u></b>	<b><u>19,054</u></b>
Provision for litigation	276	283
Provision for retirement pension and severance pay	4,000	2,000
Provision on other liabilities	<u>26,656</u>	<u>4,310</u>
<b>Provisions in accordance with IAS 37</b>	<b><u>30,932</u></b>	<b><u>6,593</u></b>
<b>Total</b>	<b><u>50,347</u></b>	<b><u>25,647</u></b>

Movements in the provision for losses on commitments and contingent liabilities in accordance with IFRS 9 can be summarized as follows:

	31 December 2025	31 December 2024
<b>Opening balance</b>	<b>19,054</b>	<b>16,092</b>
Provision for the period	46,568	51,461
Release of provision for the period	(27,061)	(16,438)
Use of provision	(18,763)	(32,458)
FX revaluation	(383)	397
<b>Closing balance</b>	<b><u>19,415</u></b>	<b><u>19,054</u></b>

<sup>3</sup> Other liabilities are expected to be recovered or settled no more than twelve months after the reporting period.

**NOTE 24: OTHER LIABILITIES<sup>4</sup> AND PROVISIONS (in HUF mn) [continued]**

Movements in the provision for losses on commitments and contingent liabilities in accordance with IAS 37 can be summarized as follows:

	31 December 2025	31 December 2024
<b>Opening balance</b>	<b>6,593</b>	<b>6,405</b>
Provision for the period	28,314	4,958
Release of provision	(5,330)	(2,405)
Use of provision	-	(2,557)
FX revaluation	(218)	192
Other movement	<u>1,573</u>	-
<b>Closing balance</b>	<b><u>30,932</u></b>	<b><u>6,593</u></b>

**NOTE 25: SUBORDINATED BONDS AND LOANS (in HUF mn)**

	31 December 2025	31 December 2024
Within one year		
In HUF	1,852	1,898
In foreign currency	10,286	3,856
	<b><u>12,138</u></b>	<b><u>5,754</u></b>
Over one year:		
In HUF	15,966	13,256
In foreign currency	465,483	343,261
	<b><u>481,449</u></b>	<b><u>356,517</u></b>
<b>Total</b>	<b><u>493,587</u></b>	<b><u>362,271</u></b>

Interest rates on subordinated bonds and loans are as follows (%):

	31 December 2025	31 December 2024
Subordinated bonds and loans denominated in foreign currency	7.3%-8.8%	6.0%-8.8%
Average interest on subordinated bonds and loans denominated in	5.72%	4.99%
Average interest on subordinated bonds and loans denominated in	7.76%	6.76%

<sup>4</sup> Other liabilities are expected to be recovered or settled no more than twelve months after the reporting period.

**NOTE 25: SUBORDINATED BONDS AND LOANS (in HUF mn) [continued]**

Subordinated loans and bonds are detailed as follows as at 31 December 2025:

Type	Name	Date of issuance	Date of maturity	Issue price	Currency	Nominal value in FX million	Nominal value in HUF million	Amortised cost in Fx million	Amortised cost in HUF million	Interest conditions	Current interest rate
Subordinated bond	XS2988670878	30/01/2025	30/07/2035	100.00%	USD	746	245,147	790	259,488	Fixed 7.3% (payable annual)	7.300%
Subordinated bond	XS2586007036	15/02/2023	15/05/2033	99.42%	USD	647	212,358	659	216,279	Fixed 8.75% (payable annual)	8.750%
Discount bond	HU0000362553	01/06/2023	31/05/2028	66.68%	HUF	1,959	1,959	1,611	1,611	N.a.	
Discount bond	HU0000365374	30/05/2025	31/05/2030	72.95%	HUF	2,053	2,053	1,555	1,555	N.a.	
Discount bond	HU0000363908	31/05/2024	31/05/2029	72.11%	HUF	1,901	1,901	1,521	1,521	N.a.	
Discount bond	HU0000361605	31/03/2022	31/05/2027	72.13%	HUF	1,092	1,092	998	998	N.a.	
Discount bond	HU0000360532	31/05/2021	31/05/2027	87.27%	HUF	795	795	769	769	N.a.	
Discount bond	HU0000361597	31/03/2022	31/05/2026	76.86%	HUF	783	783	762	762	N.a.	
Discount bond	HU0000360524	31/05/2021	31/05/2026	90.02%	HUF	707	707	701	701	N.a.	
Discount bond	HU0000360540	31/05/2021	31/05/2028	84.31%	HUF	669	669	631	631	N.a.	
Discount bond	HU0000362561	01/06/2023	31/05/2029	63.21%	HUF	684	684	526	526	N.a.	
Discount bond	HU0000362579	01/06/2023	31/05/2030	60.08%	HUF	719	719	522	522	N.a.	
Discount bond	HU0000362587	01/06/2023	31/05/2031	56.64%	HUF	762	762	519	519	N.a.	
Discount bond	HU0000362595	01/06/2023	31/05/2032	52.82%	HUF	817	817	518	518	N.a.	
Discount bond	HU0000365382	30/05/2025	31/05/2031	67.51%	HUF	733	733	514	514	N.a.	
Discount bond	HU0000365408	30/05/2025	31/05/2033	58.08%	HUF	843	843	509	509	N.a.	
Discount bond	HU0000365390	30/05/2025	31/05/2032	62.54%	HUF	782	782	509	509	N.a.	
Discount bond	HU0000365416	30/05/2025	31/05/2034	53.83%	HUF	907	907	509	509	N.a.	
Discount bond	HU0000363916	31/05/2024	31/05/2030	67.44%	HUF	672	672	503	503	N.a.	
Discount bond	HU0000363924	31/05/2024	31/05/2031	63.20%	HUF	717	717	503	503	N.a.	
Discount bond	HU0000363957	31/05/2024	31/05/2033	55.27%	HUF	818	818	502	502	N.a.	
Discount bond	HU0000363932	31/05/2024	31/05/2032	59.16%	HUF	765	765	502	502	N.a.	
Discount bond	HU0000361613	31/03/2022	31/05/2028	67.89%	HUF	554	554	476	476	N.a.	
Discount bond	HU0000361621	31/03/2022	31/05/2029	64.03%	HUF	554	554	448	448	N.a.	
Discount bond	HU0000361639	31/03/2022	31/05/2030	60.38%	HUF	554	554	422	422	N.a.	
Discount bond	HU0000359740	29/05/2020	31/05/2026	91.10%	HUF	392	392	390	390	N.a.	
Discount bond	HU0000360557	31/05/2021	31/05/2029	81.23%	HUF	403	403	368	368	N.a.	
Discount bond	HU0000361647	31/03/2022	31/05/2031	56.88%	HUF	384	384	275	275	N.a.	
Discount bond	HU0000365424	30/05/2025	31/05/2035	49.88%	HUF	333	333	173	173	N.a.	
Discount bond	HU0000362603	01/06/2023	31/05/2033	49.02%	HUF	282	282	166	166	N.a.	
Discount bond	HU0000363940	31/05/2024	31/05/2034	51.58%	HUF	283	283	162	162	N.a.	
Discount bond	HU0000359757	29/05/2020	31/05/2027	89.05%	HUF	95	95	93	93	N.a.	
Discount bond	HU0000360565	31/05/2021	31/05/2030	78.09%	HUF	104	104	92	92	N.a.	
Discount bond	HU0000361654	31/03/2022	31/05/2032	53.52%	HUF	105	105	71	71	N.a.	
<b>Total</b>							<b>480,726</b>		<b>493,587</b>		

**NOTE 25: SUBORDINATED BONDS AND LOANS (in HUF mn) [continued]**

Subordinated loans and bonds are detailed as follows as at 31 December 2024:

Type	Name	Date of issuance	Date of maturity	Issue price	Currency	Nominal value in FX million	Nominal value in HUF million	Amortised cost in Fx million	Amortised cost in HUF million	Interest conditions	Current interest rate
Subordinated bond	XS2586007036	15/02/2023	15/05/2033	99.42%	USD	645	253,770	642	252,504	Fixed 8.75% (payable annual)	8.750%
Subordinated bond	XS0274147296	07/11/2006	Perpetual	99.38%	EUR	229	93,717	231	94,612	Three-month EURIBOR + 3%, variable (payable quarterly)	6.032%
Discount bond	HU0000362553	01/06/2023	31/05/2028	66.68%	HUF	1,959	1,959	1,485	1,485	N.a.	
Discount bond	HU0000363908	31/05/2024	31/05/2029	72.11%	HUF	1,901	1,901	1,425	1,425	N.a.	
Discount bond	HU0000360516	31/05/2021	31/05/2025	92.54%	HUF	1,216	1,216	1,206	1,206	N.a.	
Discount bond	HU0000361605	31/03/2022	31/05/2027	72.13%	HUF	1,092	1,092	937	937	N.a.	
Discount bond	HU0000360532	31/05/2021	31/05/2027	87.27%	HUF	795	795	752	752	N.a.	
Discount bond	HU0000361597	31/03/2022	31/05/2026	76.86%	HUF	783	783	716	716	N.a.	
Discount bond	HU0000360524	31/05/2021	31/05/2026	90.02%	HUF	707	707	686	686	N.a.	
Discount bond	HU0000360540	31/05/2021	31/05/2028	84.31%	HUF	669	669	616	616	N.a.	
Discount bond	HU0000359732	29/05/2020	31/05/2025	92.99%	HUF	592	592	589	589	N.a.	
Discount bond	HU0000362561	01/06/2023	31/05/2029	63.21%	HUF	684	684	488	488	N.a.	
Discount bond	HU0000362579	01/06/2023	31/05/2030	60.08%	HUF	719	719	485	485	N.a.	
Discount bond	HU0000362587	01/06/2023	31/05/2031	56.64%	HUF	762	762	483	483	N.a.	
Discount bond	HU0000362595	01/06/2023	31/05/2032	52.82%	HUF	817	817	483	483	N.a.	
Discount bond	HU0000363916	31/05/2024	31/05/2030	67.44%	HUF	672	672	471	471	N.a.	
Discount bond	HU0000363924	31/05/2024	31/05/2031	63.20%	HUF	717	717	471	471	N.a.	
Discount bond	HU0000363932	31/05/2024	31/05/2032	59.16%	HUF	765	765	470	470	N.a.	
Discount bond	HU0000363957	31/05/2024	31/05/2033	55.27%	HUF	818	818	470	470	N.a.	
Discount bond	HU0000361613	31/03/2022	31/05/2028	67.89%	HUF	554	554	447	447	N.a.	
Discount bond	HU0000361621	31/03/2022	31/05/2029	64.03%	HUF	554	554	421	421	N.a.	
Discount bond	HU0000361639	31/03/2022	31/05/2030	60.38%	HUF	554	554	397	397	N.a.	
Discount bond	HU0000359740	29/05/2020	31/05/2026	91.10%	HUF	392	392	384	384	N.a.	
Discount bond	HU0000360557	31/05/2021	31/05/2029	81.23%	HUF	403	403	359	359	N.a.	
Discount bond	HU0000361647	31/03/2022	31/05/2031	56.88%	HUF	384	384	258	258	N.a.	
Discount bond	HU0000362603	01/06/2023	31/05/2033	49.02%	HUF	282	282	155	155	N.a.	
Discount bond	HU0000363940	31/05/2024	31/05/2034	51.58%	HUF	283	283	152	152	N.a.	
Discount bond	HU0000358932	30/05/2019	31/05/2025	83.86%	HUF	104	104	103	103	N.a.	
Discount bond	HU0000359757	29/05/2020	31/05/2027	89.05%	HUF	95	95	91	91	N.a.	
Discount bond	HU0000360565	31/05/2021	31/05/2030	78.09%	HUF	104	104	89	89	N.a.	
Discount bond	HU0000361654	31/03/2022	31/05/2032	53.52%	HUF	<u>105</u>	<u>105</u>	<u>66</u>	<u>66</u>	N.a.	
<b>Total</b>							<b><u>366,969</u></b>		<b><u>362,271</u></b>		

**NOTE 26: SHARE CAPITAL (in HUF mn)**

31 December 2025 31 December 2024

Authorized, issued and fully paid:

Ordinary shares	28.000	28.000
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The nominal value of the shares is HUF 100 per shares. All of the shares are ordinary shares representing the same rights to the shareholders. Furthermore there are no restrictions on the distribution of dividends and the repayment of capital.

**NOTE 27: RETAINED EARNINGS AND RESERVES (in HUF mn)**

Based on the instructions of Act C of 2000 on accounting (“Act on Accounting”) financial statements of the Bank are prepared in accordance with IFRS as issued by the IASB as adopted by the EU.

In 2025 dividend of HUF 270,000 million was paid out from the profit of the year 2024, which meant HUF 964.28 dividend per share payable to the shareholders. In 2026 dividend of HUF 300,000 million are expected to be proposed by the Management from the profit of the year 2025, which means HUF 1071.43 dividend per share payable to the shareholders.

Based on paragraph 114/B of Act on Accounting Equity Correlation Table is prepared and disclosed as a part of the explanatory notes for the reporting date by the Bank.

Equity correlation table shall contain the opening and closing balances of the shareholder’s equity in accordance with IFRS, furthermore deducted from this the opening and closing balances of the specified equity elements. Equity correlation table shall contain also untied retained earnings available for the payment of dividends, covering retained earnings from the last financial year for which accounts have been adopted comprising net profit for the period of that financial year minus cumulative unrealized gains claimed in connection with any increase in the fair value of investment properties, as provided in IAS 40 - Investment Property, reduced by the cumulative income tax accounted for under IAS 12 - Income Taxes.

**Share capital**

Share capital is the portion of the Bank’s equity that has been obtained by the issue of shares in the corporation to a shareholder, usually for cash.

**Share-based payment reserve**

Share-based payment reserve represents the increase in the equity due to the goods or services were received by the Bank in an equity-settled share-based payment transaction, valued at the fair value of the goods or services received.

**Retained earnings**

Profit of previous years generated by the Bank that are not distributed to shareholders as dividends.

**Put option reserve**

OTP Bank Plc. and MOL Plc. entered into a share swap agreement in 16 April 2009, whereby OTP has changed 24,000,000 OTP ordinary shares for 5,010,501 „A series” MOL shares. The amended final maturity of the share swap agreement is 11 July 2027, until which any party can initiate cash or physical settlement of the transaction.

Put option reserve represents the written put option over OTP ordinary shares were accounted as a deduction from equity at the date of OTP-MOL share swap transaction.

**Other comprehensive income**

Other comprehensive income comprises items of income and expense (including reclassification adjustments) that are not recognised in profit or loss as required or permitted by other IFRSs.

**General reserve**

The Bank shall place ten per cent of the after-tax profit of the year into general reserve prescribed by the Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises. The Bank is allowed to use general reserves only to cover operating losses arising from their activities.

**Tied-up reserve**

The tied-up reserve shall consist of sums tied up from the capital reserve and from the retained earnings.

**NOTE 27: RETAINED EARNINGS AND RESERVES (in HUF mn) [continued]**

The equity correlation table of the Bank based on paragraph 114/B of Act on Accounting as at 31 December 2025:

31 December 2025 Closing balance	Share Capital	Capital reserve	Share- based payment reserve	Retained earnings and reserves	Option reserve	Treasury Shares	Revaluation reserve	Tied-up reserve	Net profit for the year	Total
<b>Components of Shareholder's</b>	<b>28,000</b>	<b>52</b>	<b>62,204</b>	<b>3,302,845</b>	<b>(55,468)</b>	<b>(327,914)</b>	-	-	-	<b>3,009,719</b>
Other comprehensive income	-	-	-	(11,285)	-	-	11,285	-	-	-
Option reserve	-	(55,468)	-	-	55,468	-	-	-	-	-
Treasury shares	-	(327,914)	-	-	-	327,914	-	-	-	-
Share based payments	-	62,204	(62,204)	-	-	-	-	-	-	-
Profit after income tax	-	-	-	(663,259)	-	-	-	-	663,259	-
General reserve and tied-up reserve	-	-	-	(333,762)	-	-	-	333,762	-	-
<b>Components of Shareholder's equity in accordance with</b>	<b><u>28,000</u></b>	<b><u>(321,126)</u></b>	<b>≡</b>	<b><u>2,294,539</u></b>	<b>≡</b>	<b>≡</b>	<b><u>11,285</u></b>	<b><u>333,762</u></b>	<b><u>663,259</u></b>	<b><u>3,009,719</u></b>

The equity correlation table of the Bank based on paragraph 114/B of Act on Accounting as at 1 January 2025:

1 January 2025 Opening balance	Share Capital	Capital reserve	Share- based payment reserve	Retained earnings and reserves	Option reserve	Treasury Shares	Revaluation reserve	Tied-up reserve	Net profit for the year	Total
<b>Components of Shareholder's</b>	<b>28,000</b>	<b>52</b>	<b>56,813</b>	<b>2,894,922</b>	<b>(55,468)</b>	<b>(123,066)</b>	-	-	-	<b>2,801,253</b>
Other comprehensive income	-	-	-	(9,806)	-	-	9,806	-	-	-
Option reserve	-	(55,468)	-	-	55,468	-	-	-	-	-
Treasury shares	-	(123,066)	-	-	-	123,066	-	-	-	-
Share based payments	-	56,813	(56,813)	-	-	-	-	-	-	-
Profit after income tax	-	-	-	(744,999)	-	-	-	-	744,999	-
General reserve	-	-	-	(267,436)	-	-	-	267,436	-	-
<b>Components of Shareholder's equity in accordance with</b>	<b><u>28,000</u></b>	<b><u>(121,669)</u></b>	<b>≡</b>	<b><u>1,872,681</u></b>	<b>≡</b>	<b>≡</b>	<b><u>9,806</u></b>	<b><u>267,436</u></b>	<b><u>744,999</u></b>	<b><u>2,801,253</u></b>

**NOTE 27: RETAINED EARNINGS AND RESERVES (in HUF mn) [continued]****Calculated untied retained earnings in accordance with paragraph 114/B of Act on Accounting**

	31 December 2025	31 December 2024
Retained earnings	2,294,539	1,872,681
Profit after income tax	<u>663,259</u>	<u>744,999</u>
<b>Untied retained earnings</b>	<b><u>2,957,798</u></b>	<b><u>2,617,680</u></b>

**Items of retained earnings and other reserves**

	31 December 2025	31 December 2024
Retained earnings	2,294,539	1,872,681
Capital reserve	52	52
Option reserve	(55,468)	(55,468)
Other reserves	333,762	267,436
Fair value of financial instruments measured at fair value through other comprehensive income	13,367	13,180
Share-based payment reserve	62,204	56,813
Fair value of derivative financial instruments designated as cash-flow hedge	(2,082)	(3,374)
Net profit for the period	<u>663,259</u>	<u>744,999</u>
<b>Retained earnings and other reserves</b>	<b><u>3,309,633</u></b>	<b><u>2,896,319</u></b>

**Fair value adjustment of securities at fair value through other comprehensive income**

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>(54,931)</b>	<b>(40,262)</b>
Change of fair value correction	6,273	(18,559)
Deferred tax related to change of fair value correction	(547)	3,890
<b>Closing balance</b>	<b><u>(49,205)</u></b>	<b><u>(54,931)</u></b>

**Expected credit loss on securities at fair value through other comprehensive income**

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>47,589</b>	<b>24,345</b>
Increase of loss allowance	10,659	29,399
Release of loss allowance	(9,687)	(4,839)
Deferred tax related to expected credit loss	483	(4,707)
Fx movement	<u>(6,336)</u>	<u>3,391</u>
<b>Closing balance</b>	<b><u>42,708</u></b>	<b><u>47,589</u></b>

**Fair value changes of equity instruments as at fair value through other comprehensive income**

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>20,522</b>	<b>10,278</b>
Change of fair value correction	(741)	11,549
Deferred tax related to change of fair value correction	84	(1,305)
<b>Closing balance</b>	<b><u>19,865</u></b>	<b><u>20,522</u></b>

**NOTE 28: TREASURY SHARES (in HUF mn)**

	31 December 2025	31 December 2024
Nominal value (ordinary shares)	1,441	705
Carrying value at acquisition cost	327,914	123,066

The changes in the carrying value of treasury shares are due to repurchase and sale transactions on market authorised by the General Assembly.

**Change in number of shares:**

	31 December 2025	31 December 2024
<b>Number of shares as at 1 January</b>	<b>7,045,523</b>	<b>571,246</b>
Additions	9,746,088	8,775,919
Disposals	<u>(2,379,233)</u>	<u>(2,301,642)</u>
<b>Number of shares at the end of the period</b>	<b><u>14,412,378</u></b>	<b><u>7,045,523</u></b>

**Change in carrying value:**

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>123,066</b>	<b>6,154</b>
Additions	249,744	153,105
Disposals	<u>(44,896)</u>	<u>(36,193)</u>
<b>Closing Balance</b>	<b><u>327,914</u></b>	<b><u>123,066</u></b>

	31 December 2025	31 December 2024
Face value of treasury shares held by OTP Group members	1,171	1,197

**NOTE 29: INTEREST INCOME AND EXPENSES (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Interest income accounted for using the effective interest rate method from / on</b>		
Loans at amortised cost	408,116	437,745
FVOCI securities	41,310	30,311
Securities at amortised cost	177,115	216,762
Placements with other banks	166,937	179,241
Financial liabilities	146	214
Amounts due from banks and balances with National Bank of Hungary	139,361	161,598
Repo receivables	<u>19,701</u>	<u>14,663</u>
<b>Subtotal</b>	<b><u>952,686</u></b>	<b><u>1,040,534</u></b>
<b>Income similar to interest income</b>		
Loans mandatorily measured at fair value through profit or loss	79,558	62,663
Swap and forward deals related to Placements with other banks	460,943	478,199
Swap and forward deals related to Loans at amortised cost	42,262	35,034
Swap and forward deals related to FVOCI securities	7,420	9,714
Investment properties	<u>7</u>	<u>9</u>
<b>Subtotal</b>	<b><u>590,190</u></b>	<b><u>585,619</u></b>
<b>Interest income total</b>	<b><u>1,542,876</u></b>	<b><u>1,626,153</u></b>
<b>Interest expense due to / from / on</b>		
Amounts due to banks and deposits from the National Bank of Hungary and other banks	524,768	583,183
Deposits from customers	243,884	314,695
Leasing liabilities	3,029	3,147
Liabilities from issued securities	77,835	103,579
Subordinated bonds and loans	39,349	30,163
Investment properties (depreciation)	161	149
Financial assets	1	2,139
Repo liabilities	55,775	70,496
<b>Interest expense total</b>	<b><u>944,802</u></b>	<b><u>1,107,551</u></b>

**NOTE 30: RISK COST (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Loss allowance of loans at amortised cost</b>		
Loss allowance	207,836	260,589
Release of loss allowance	(196,243)	(240,388)
	<u>11,593</u>	<u>20,201</u>
<b>Loss allowance of sight deposits and placements with other banks</b>		
Loss allowance	5,308	8,519
Release of loss allowance	(6,527)	(8,752)
	<u>(1,219)</u>	<u>(233)</u>
<b>Loss allowance of placements with other banks</b>		
Loss allowance	3,487	2,256
Release of loss allowance	(3,639)	(2,269)
	<u>(152)</u>	<u>(13)</u>
<b>Loss allowance of FVOCI debt instruments</b>		
Loss allowance	10,659	29,399
Release of loss allowance	(9,687)	(4,839)
	<u>972</u>	<u>24,560</u>
<b>Loss allowance of securities at amortised cost</b>		
Loss allowance	9,922	22,001
Release of loss allowance	(14,995)	(11,433)
	<u>(5,073)</u>	<u>10,568</u>
<b>Provision on loan commitments and financial guarantees</b>		
Provision for the period	46,568	51,461
Release of provision	(45,824)	(48,896)
	<u>744</u>	<u>2,565</u>
<b>Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss</b>	<u>(1,016)</u>	<u>(4,193)</u>
<b>Risk cost total</b>	<u>5,849</u>	<u>53,455</u>

**NOTE 31: NET PROFIT FROM FEES AND COMMISSIONS (in HUF mn)****Income from fees and commissions:**

	<b>Year ended 31 December 2025</b>	<b>Year ended 31 December 2024</b>
<b>Fees and commissions related to lending</b>	<b>13,608</b>	<b>13,782</b>
Deposit and account maintenance fees and commissions	233,110	194,155
Fees and commission related to the issued bank cards	179,839	147,749
Fees and commissions related to security trading	68,065	48,143
Fx margin	27,301	22,928
Fees and commissions paid by OTP Mortgage Bank Ltd.	16,290	12,564
Net insurance fee income	16,736	15,701
Other	<u>14,709</u>	<u>13,544</u>
<b>Fees and commissions from contracts with customers</b>	<b><u>556,050</u></b>	<b><u>454,784</u></b>
<b>Total Income from fees and commissions:</b>	<b><u>569,658</u></b>	<b><u>468,566</u></b>

**Contract balances**

	<b>Year ended 31 December 2025</b>	<b>Year ended 31 December 2024</b>
Receivables, which are included in 'other assets'	36,703	26,960
Loss allowance	(571)	(542)

**Fee and commission expense**

	<b>Year ended 31 December 2025</b>	<b>Year ended 31 December 2024</b>
Other fees and commissions related to issued bank cards	84,845	76,040
Insurance fees	1,373	901
Fees and commissions related to lending	6,274	5,856
Fees and commissions related to security trading	1,834	2,153
Fees and commissions relating to deposits	4,170	3,387
Trust activities related to securities	2,947	2,763
Postal fees	248	241
Money market transaction fees and commissions	1,434	211
Non-repayable assets contributed to Hungarian Tourism	8,023	-
Expenses related to business SMS messaging	7,392	-
Other	<u>570</u>	<u>665</u>
<b>Total</b>	<b><u>119,110</u></b>	<b><u>92,217</u></b>
<b>Net profit from fees and commissions</b>	<b><u>450,548</u></b>	<b><u>376,349</u></b>

**NOTE 32: GAINS AND LOSSES BY TRANSACTIONS (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Losses arising from derecognition of financial assets measured at amortised cost</b>		
Gain from loans	25	785
Loss from loans	(2,383)	(2,309)
Gain from securities	29	-
Loss from securities	(2,344)	(7,871)
Other	(550)	(461)
<b>Total</b>	<b><u>(5,223)</u></b>	<b><u>(9,856)</u></b>
<b>Additional information to Gains or losses from operating income:</b>		
	Year ended 31 December 2025	Year ended 31 December 2024
<b>Foreign exchange gains and (losses)</b>		
Gains from foreign exchange	2,047	-
Loss from foreign exchange	-	(5,500)
Margin gains	5,194	4,332
Margin losses	(7,189)	(5,717)
<b>Total</b>	<b><u>52</u></b>	<b><u>(6,885)</u></b>
	Year ended 31 December 2025	Year ended 31 December 2024
<b>Net results on derivative instruments and hedge relationships</b>		
Gains on FX spot, swap and option deals	62,020	50,660
Losses from FX spot, swap and option deals	(45,348)	(46,055)
Fees received related to option deals	7,154	5,593
Fees paid related to option deals	(5,884)	(5,372)
Gains on commodity deals	43,039	72,543
Losses from commodity deals	(42,513)	(71,944)
Gains on futures transactions	2,041	439
Losses from futures transactions	(2,433)	(695)
Losses from credit valuation adjustment related to FX spot, swap and option deals held for trading	12,080	(11,234)
Losses from credit valuation adjustment related to commodity deals	3	2
<b>Total</b>	<b><u>30,159</u></b>	<b><u>(6,063)</u></b>
	Year ended 31 December 2025	Year ended 31 December 2024
<b>(Losses) / Gains on financial instruments at fair value through profit or loss</b>		
Gains on securities mandatorily measured at fair value through profit or loss	1,344	(314)
Gains on loans mandatorily measured at fair value through profit or loss	29,531	55,604
Losses on loans mandatorily measured at fair value through profit or loss	(39,226)	(29,153)
Gains on financial liabilities designated at fair value through profit or loss	1,172	2,236
Losses on financial liabilities designated at fair value through profit or loss	(944)	(996)
<b>Total</b>	<b><u>(8,123)</u></b>	<b><u>27,377</u></b>

**NOTE 32: GAINS AND LOSSES BY TRANSACTIONS (in HUF mn) [continued]****Additional information to Gains or losses from operating income: [continued]**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Gains on securities, net</b>		
Interest income from held for trading securities	5,350	3,183
Gains on held for trading securities	10,426	7,948
Losses on held for trading securities	(4,628)	(4,051)
Gains on FVOCI securities	284	855
Gains on derecognition of investments in subsidiaries	3,626	112,076
Losses on derecognition of investments in subsidiaries	(2,414)	(836)
Gains/losses from other securities	<u>8,320</u>	<u>1,688</u>
<b>Total</b>	<b><u>20,964</u></b>	<b><u>120,863</u></b>
<b>Dividend income</b>		
Distribution from investments in subsidiaries	400,832	402,843
Distribution from held for trading securities	11,087	10,075
Distribution from FVOCI equity instruments	<u>405</u>	<u>344</u>
<b>Total</b>	<b><u>412,324</u></b>	<b><u>413,262</u></b>
<b>Total gains and losses from operating income (without other operating income)</b>	<b><u>455,376</u></b>	<b><u>548,554</u></b>

For the year ended 31 December 2025 gains and losses attributable to the hedged risk on the hedged item and on the hedging instruments and also ineffectiveness in case of fair value hedge on amortised cost line items as follows

	Hedged items	Hedging instrument	Hedge ineffectiveness
Fair value hedge	1,681	(727)	954

For the year ended 31 December 2024 gains and losses attributable to the hedged risk on the hedged item and on the hedging instruments and also ineffectiveness in case of fair value hedge on amortised cost line items as follows

	Hedge items	Hedging instrument	Hedge ineffectiveness
Fair value hedge	(28,937)	38,549	9,612

**NOTE 33: OTHER OPERATING INCOME AND EXPENSES AND OTHER ADMINISTRATIVE EXPENSES (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Other operating income</b>		
Other operating income from OTP ESOP	25,070	9,676
Intermediary and other services	2,798	2,937
Gains on IT services provided to subsidiaries	2,480	1,996
Income from lease of tangible assets	1,246	1,292
Gains on sale of tangible assets	1,245	(19)
Derecognition of financial liabilities at amortised cost	1,115	1,957
Non-repayable assets received	483	1,009
Gains related to ATM maintenance activities	294	430
Income from written off receivables	460	318
(Losses) / Gains on issued securities	(1,299)	(3,063)
Other	<u>1,631</u>	<u>1,847</u>
<b>Total</b>	<b><u>35,523</u></b>	<b><u>18,380</u></b>
	<b>Year ended 31 December 2025</b>	<b>Year ended 31 December 2024</b>
<b>Other operating expenses</b>		
Loss allowance on investments in subsidiaries	(44,299)	(7,427)
Release of provision for off-balance sheet commitments and contingent liabilities	(22,985)	4
Release of loss allowance / (Loss allowance) on other assets	(12,914)	(5,514)
Tax paid on interest recognised in foreign country	(3,804)	(4,159)
Financial support for sport association and organization of public utility	(3,207)	(14,490)
Non-repayable assets contributed	(918)	(1,826)
Other	<u>(3,378)</u>	<u>(3,660)</u>
<b>Total</b>	<b><u>(91,505)</u></b>	<b><u>(37,072)</u></b>
	<b>Year ended 31 December 2025</b>	<b>Year ended 31 December 2024</b>
<b>Other administrative expenses:</b>		
<b>Personnel expenses:</b>		
Wages	169,201	146,771
Taxes related to personnel expenses	24,446	21,333
Other personnel expenses	<u>36,964</u>	<u>32,164</u>
<b>Subtotal</b>	<b><u>230,611</u></b>	<b><u>200,268</u></b>
<b>Depreciation and amortization</b>	<b><u>76,122</u></b>	<b><u>63,551</u></b>
<b>Other administrative expenses:</b>		
Taxes, other than income tax	241,001	136,276
Services	94,042	92,583
Fees payable to authorities and other fees	17,330	16,269
Administration expenses, including rental fees	9,174	8,485
Professional fees	20,345	16,347
Advertising	<u>15,880</u>	<u>14,168</u>
<b>Subtotal</b>	<b><u>397,772</u></b>	<b><u>284,128</u></b>
<b>Total</b>	<b><u>704,505</u></b>	<b><u>547,947</u></b>

Special tax of financial institutions was paid by the Bank in the amount of HUF 26,711 million for the year ended 31 December 2025 and HUF 13,581 million for the year ended 31 December 2024, recognized as an expense thus decreased the corporate tax base. For the year ended 31 December 2025 financial transaction duty was paid by the Bank in the amount of HUF 162,333 million while for the year ended 31 December 2024 the same duty was HUF 122,434 million.

**NOTE 34: INCOME TAX (in HUF mn)**

The Bank is presently liable for income tax at a rate of 9% of taxable income, local taxes at a rate of 2.3% of taxable revenue.

A breakdown of the income tax expense is:

	31 December 2025	31 December 2024
Current tax expense	69,966	66,563
Deferred tax (benefit)/expense	<u>(2,256)</u>	<u>(6)</u>
<b>Total</b>	<b><u>67,710</u></b>	<b><u>66,557</u></b>

A reconciliation of the deferred tax liability is as follows:

	31 December 2025	31 December 2024
<b>Balance as at 1 January</b>	<b>(1,707)</b>	<b>408</b>
Deferred tax (expense)/ benefit	2,256	6
Tax effect of fair value adjustment of FVOCI securities	19	<u>(2,121)</u>
<b>Closing balance</b>	<b><u>568</u></b>	<b><u>(1,707)</u></b>

A breakdown of the deferred tax liability is as follows:

	31 December 2025	31 December 2024
Provision for untaken leave	450	450
Provision for termination benefits and jubilee	1,760	1,428
Amounts relate to negative tax base	2,159	-
<b>Deferred tax asset</b>	<b><u>4,369</u></b>	<b><u>1,878</u></b>
Fair value adjustment of held for trading and securities at fair value through other comprehensive income	(2,186)	(2,171)
Difference in depreciation and amortization	(1,615)	(1,414)
<b>Deferred tax liabilities</b>	<b><u>(3,801)</u></b>	<b><u>(3,585)</u></b>
<b>Net deferred tax assets/(liabilities)</b>	<b><u>568</u></b>	<b><u>(1,707)</u></b>

**NOTE 34: INCOME TAX (in HUF mn) [continued]**

A reconciliation of the income tax (income) / expense is as follows:

	31 December 2025	31 December 2024
Profit before income tax	730,969	811,556
Income tax at statutory tax rate (9%)	65,787	73,040
<b>Income tax adjustments due to permanent differences are as</b>		
Share-based payment	485	397
Deferred use of tax allowance	34	(4)
Dividend income	(37,109)	(46,393)
Use of tax allowance in the current year	-	(375)
Amounts unenforceable by tax law	(1,960)	153
Change due to accounting policy (Visa)	(174)	(111)
Correction due to local taxes classified as income taxes	12,933	16,051
Local taxes	29,093	24,443
Other	<u>(1,379)</u>	<u>(644)</u>
<b>Income tax</b>	<b><u>67,710</u></b>	<b><u>66,557</u></b>
Effective tax rate	9.3%	8.2%
	<b>31 December 2025</b>	<b>31 December 2024</b>
Current tax liabilities	<u>(18,589)</u>	<u>(23,591)</u>
<b>Net tax liabilities</b>	<b><u>(18,589)</u></b>	<b><u>(23,591)</u></b>

**NOTE 34: INCOME TAX (in HUF mn) [continued]****Global minimum tax**

The global minimum tax legislation has been enacted in certain jurisdictions the OTP Group operates in, mainly in the EU Member States. OTP Group is in scope of the enacted global minimum tax legislation. The legislation has been in effect for the Group's financial year beginning 1 January 2024 and introduced a minimum rate of effective taxation of 15%. The global minimum tax legislation has been adopted in Hungary in Act No. LXXXIV of 2023 on the top-up taxes ensuring a global minimum level of taxation and the amendment of related acts.

From an accounting perspective, it is unclear if the global minimum tax rules create additional temporary differences, whether to remeasure deferred taxes for the global minimum tax rules and which tax rate to use to measure deferred taxes. In response to this uncertainty, IAS 12 'Income taxes' has been amended to introduce a mandatory temporary exception to the requirements of IAS 12. Under the mandatory temporary exception, a company does not recognize or disclose information about deferred tax assets and liabilities related to the global minimum tax rules. The Bank applied the temporary exception for the year ended 31 December 2025.

Based on the status of the global minimum tax legislation, if top-up taxes arose in the jurisdictions which had not introduced the global minimum tax rules in their domestic legislation, OTP Bank Plc., being an ultimate parent entity, would be obliged to pay the top-up taxes in respect of such jurisdictions. As for Hungary, the Hungarian global minimum tax legislation provides for various options as to who is obliged to pay the Hungarian top-up (i.e., the Hungarian Group entities based on certain allocation ratios or OTP Bank Plc.). OTP group chose the option where OTP Bank Plc pays the Hungarian top-up tax. This decision may be revisited every year per the Hungarian global minimum legislation.

The global minimum tax legislation had been subject to several significant changes since their first publication and changes are still expected. Based on the most recent information available regarding the financial performance of the group entities and the prevailing interpretation of the global minimum tax legislation, the calculated amount of taxes imposed under the global minimum tax legislation payable by OTP Bank Plc. is nil.

**NOTE 35: LEASE (in HUF mn)****The Bank as a lessee:****Amounts recognised in profit and loss**

	31 December 2025	31 December 2024
Interest expense on lease liabilities	3,029	3,147
Expense relating to short-term leases	2,149	2,097
Expense relating to leases of low value assets	9	9
Expense relating to variable lease payments not included in the measurement of lease liabilities	2,241	1,865

## Leasing liabilities by maturities:

	31 December 2025	31 December 2024
Within one year	8,936	9,046
Over one year	<u>53,704</u>	<u>55,334</u>
<b>Total</b>	<b><u>62,640</u></b>	<b><u>64,380</u></b>

An analysis of movement in the carrying amount of right-of-use assets by category is as follows:

	Right-of-use of real estate	Right-of-use of machinery and equipment	Total
<b>Gross carrying amount</b>			
<b>Balance as at 1 January 2024</b>	80,124	6,530	86,654
Additions due to new contracts	488	-	488
Derecognition due to matured contracts	(2,129)	-	(2,129)
Change due to revaluation and modification	<u>1,823</u>	<u>284</u>	<u>2,107</u>
<b>Balance as at 31 December 2024</b>	<b><u>80,306</u></b>	<b><u>6,814</u></b>	<b><u>87,120</u></b>
Additions due to new contracts	6,275	-	6,275
Derecognition due to matured contracts	(1,078)	-	(1,078)
Change due to revaluation and modification	<u>3,725</u>	<u>294</u>	<u>4,019</u>
<b>Balance as at 31 December 2025</b>	<b><u>89,228</u></b>	<b><u>7,108</u></b>	<b><u>96,336</u></b>
<b>Depreciation</b>			
<b>Balance as at 1 January 2024</b>	19,428	1,004	20,432
Depreciation charge	8,278	1,525	9,803
Derecognition due to matured contracts	(2,071)	-	(2,071)
<b>Balance as at 31 December 2024</b>	<b><u>25,635</u></b>	<b><u>2,529</u></b>	<b><u>28,164</u></b>
Depreciation charge	8,402	1,566	9,968
Derecognition due to matured contracts	(709)	-	(709)
<b>Balance as at 31 December 2025</b>	<b><u>33,328</u></b>	<b><u>4,095</u></b>	<b><u>37,423</u></b>
<b>Net carrying amount</b>			
<b>Balance as at 31 December 2024</b>	<b><u>54,671</u></b>	<b><u>4,285</u></b>	<b><u>58,956</u></b>
<b>Balance as at 31 December 2025</b>	<b><u>55,900</u></b>	<b><u>3,013</u></b>	<b><u>58,913</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn)**

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

Financial instruments may result in certain risks to the Bank. The most significant risks the Bank faces include:

**36.1. Credit risk**

The Bank takes on exposure to credit risk which is the risk that a counter-party will be unable to pay amounts in full when due. The Bank structures the levels of credit risk it undertakes by placing limits on the amount of risk accepted in relation to one borrower, or banks of borrowers, and to geographical areas and loan types. Such risks are monitored on a periodical basis and subject to an annual or more frequent review. The exposure to any borrower including banks and brokers is further restricted by sublimit covering on- and off-balance sheet exposures and daily delivery risk limits in relation to trading items such as forward foreign exchange contracts. Actual exposures against limits are monitored daily.

Exposure to credit risk is managed through regular analysis of the ability of borrowers and potential borrowers to meet interest and capital repayment obligations and by changing these lending limits when appropriate. Exposure to credit risk is partly managed obtaining collateral, corporate and personal guarantees.

**36.1.1. Financial instruments by stages****Defining the expected credit loss on individual and collective basis****On individual basis:**

Individually assessed are the non-retail or micro- and small enterprise exposure of significant amount on a stand-alone basis:

- exposure in stage 3,
- exposure in workout management
- purchased or originated credit-impaired instruments which are in accordance with the conditions mentioned above

The calculation of impairment must be prepared and approved by the risk management functional areas. The calculation, all relevant factors (amortised cost, original and current EIR, contracted and expected cash flows (from business and/or collateral) for the individual periods of the entire lifecycle, other essential information enforced during the valuation) and the criteria thereof (including the factors underlying the classification as stage 3) must be documented individually.

The expected credit loss of the exposure equals the difference of the receivable's AC (gross book value) on the valuation date and the present value of the receivable's expected cash flows discounted to the valuation date by the exposure's original effective interest rate (EIR) (calculated at the initial recognition, or in the case of variable rate, recalculated due to the last interest rate change). The estimation of the expected future cash flows should be forward looking, it must also contain the effects of the possible change of macroeconomic outlook.

At least two scenarios must be used for the estimation of the expected cash flow. At least one scenarios should anticipate that realised cash flows will be significantly different from the contractual cash flows. Probability weights must be allocated to the individual scenarios. The estimation must reflect the probability of the occurrence and non-occurrence of the credit loss, even if the most probable result is the non-occurrence of the loss.

**On collective basis:**

The following exposures are subject to collective assessment:

- retail exposure irrespective of the amount,
- micro and small enterprise exposures irrespective of the amount,
- all other exposure which are insignificant on a stand-alone basis and not part of the workout management,
- exposure which are not in stage 3, significant on a stand-alone basis,
- purchased or originated credit-impaired instruments which are in accordance with the conditions mentioned above.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.1. Financial instruments by stages [continued]**

In the collective impairment methodology credit risk and the change of credit risk can be correctly captured by understanding the risk characteristics of the portfolio. In order to achieve this the main risk drivers shall be identified and used to form homogeneous segments having similar risk characteristics. The segmentation is expected to stay stable from month to month however a regular (at least yearly) revision of the segmentation process should be set up to capture the change of risk characteristics. The segmentation must be performed separately for each parameter, since in each case different factors may have relevance.

The Bank's Headquarters Group Reserve Committee stipulates the guidelines related to the collective impairment methodology at group level. In addition, it has right of agreement in respect of the risk parameters (PD -probability of default, LGD - loss given default, EAD – exposure at default) and segmentation criteria proposed by the group members.

The review of the parameters must be performed at least annually and the results should be approved by the Group Reserve Committee. Local Risk Managements is responsible for parameter estimations and updates, macroeconomic scenarios are calculated by OTP Bank Headquarters for each subsidiary and each parameter. Based on the consensus proposal of Local Risk Management and OTP Bank Headquarters, the Group Reserve Committee decides on the modification of parameters (all parameters for impairment calculation).

The impairment parameters should be backtested at least annually.

The expected loss calculation should be forward looking, including forecasts of future economic conditions. This may be achieved by applying 3-5 different macroeconomic scenarios, which may be integrated in the PD, LGD and EAD parameters.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.1. Financial instruments by stages [continued]**

Gross carrying amount and accumulated loss allowance of financial assets at amortized cost and fair value through other comprehensive income by IFRS 9 stages as at 31 December 2025:

	Carrying amount/ Exposure	Gross carrying amount / Notional amount					Loss allowance					Write-off
		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	Total	
<b>Cash, amounts due from banks and balances with the National Bank of Hungary</b>	1,359,760	1,353,993	7,896	-	-	1,361,889	2,053	76	-	-	2,129	-
<b>Placements with other banks</b>	3,161,544	3,154,623	9,826	985	-	3,165,434	1,706	1,199	985	-	3,890	-
<b>Repo receivables</b>	322,368	322,569	-	-	-	322,569	201	-	-	-	201	-
<i>Retail consumer loans</i>	760,810	657,533	134,289	19,675	-	811,497	9,262	29,547	11,878	-	50,687	-
<i>Mortgage loans</i>	37,000	30,088	3,661	2,284	1,460	37,493	14	62	356	61	493	-
<i>Municipal loans</i>	75,695	69,585	8,089	-	-	77,674	1,541	438	-	-	1,979	-
<i>Corporate loans</i>	4,261,819	3,647,184	613,720	81,943	29	4,342,876	20,385	35,391	25,275	6	81,057	30,292
<b>Loans at amortised cost</b>	5,135,324	4,404,390	759,759	103,902	1,489	5,269,540	31,202	65,438	37,509	67	134,216	30,292
<b>FVOCI debt instruments</b>	1,221,514	1,211,301	-	10,213	-	1,221,514	2,783	-	44,149	-	46,932	-
<b>Securities at amortised cost</b>	3,368,087	3,355,990	19,192	22,794	-	3,397,976	9,063	1,487	19,339	-	29,889	-
<b>Other financial assets</b>	88,927	82,962	878	22,437	7	106,284	216	313	16,823	5	17,357	-
<b>Total as at 31 December 2025</b>	<b>14,657,524</b>	<b>13,885,828</b>	<b>797,551</b>	<b>160,331</b>	<b>1,496</b>	<b>14,845,206</b>	<b>47,224</b>	<b>68,513</b>	<b>118,805</b>	<b>72</b>	<b>234,614</b>	<b>30,292</b>
Loan commitments	2,983,685	2,882,014	110,499	5,291	-	2,997,804	9,218	4,293	608	-	14,119	-
Financial guarantees	2,099,791	2,054,705	45,384	4,292	-	2,104,381	3,352	467	771	-	4,590	-
Factoring loan commitments	340,223	319,449	18,193	3,098	-	340,740	346	53	118	-	517	-
Bill of credit	17,404	17,593	-	-	-	17,593	189	-	-	-	189	-
<b>Loan commitments and financial guarantees total</b>	<b>5,441,103</b>	<b>5,273,761</b>	<b>174,076</b>	<b>12,681</b>	<b>=</b>	<b>5,460,518</b>	<b>13,105</b>	<b>4,813</b>	<b>1,497</b>	<b>=</b>	<b>19,415</b>	<b>=</b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.1. Financial instruments by stages [continued]**

Gross carrying amount and accumulated loss allowance of financial assets at amortized cost and fair value through other comprehensive income by IFRS 9 stages as at 31 December 2024:

	Carrying amount/ Exposure	Gross carrying amount / Notional amount					Loss allowance					Write-off
		Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	Total	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	Total	
<b>Cash, amounts due from banks and balances with the National Bank of Hungary</b>	2,075,179	2,044,628	32,664	-	-	2,077,292	1,851	262	-	-	2,113	-
<b>Placements with other banks</b>	2,948,536	2,940,967	11,653	1,135	-	2,953,755	2,751	1,333	1,135	-	5,219	-
<b>Repo receivables</b>	238,079	238,433	-	-	-	238,433	354	-	-	-	354	-
<i>Retail consumer loans</i>	659,121	522,785	168,325	18,904	-	710,014	7,808	31,027	12,058	-	50,893	-
<i>Mortgage loans</i>	45,849	36,171	4,950	3,796	1,684	46,601	20	91	534	107	752	-
<i>Municipal loans</i>	102,852	103,765	852	-	-	104,617	1,547	218	-	-	1,765	-
<i>Corporate loans</i>	3,862,973	3,161,499	699,698	84,646	8,466	3,954,309	16,204	41,927	32,813	392	91,336	28,741
<b>Loans at amortised cost</b>	4,670,795	3,824,220	873,825	107,346	10,150	4,815,541	25,579	73,263	45,405	499	144,746	28,741
<b>FVOCI debt instruments</b>	558,668	537,145	-	21,523	-	558,668	1,003	-	51,293	-	52,296	-
<b>Securities at amortised cost</b>	3,334,145	3,330,049	5,516	37,491	-	3,373,056	11,057	505	27,349	-	38,911	-
<b>Other financial assets</b>	69,128	67,972	951	6,976	8	75,907	237	307	6,229	6	6,779	-
<b>Total as at 31 December 2024</b>	<b>13,894,530</b>	<b>12,983,414</b>	<b>924,609</b>	<b>174,471</b>	<b>10,158</b>	<b>14,092,652</b>	<b>42,832</b>	<b>75,670</b>	<b>131,411</b>	<b>505</b>	<b>250,418</b>	<b>28,741</b>
Loan commitments	2,525,121	2,391,305	139,251	6,434	-	2,536,990	6,854	4,594	421	-	11,869	-
Financial guarantees	1,897,269	1,803,492	92,134	8,092	-	1,903,718	3,176	1,061	2,212	-	6,449	-
Factoring loan commitments	381,312	364,434	13,286	4,291	-	382,011	479	43	177	-	699	-
Bill of credit	5,144	5,181	-	-	-	5,181	37	-	-	-	37	-
<b>Loan commitments and financial guarantees total</b>	<b>4,808,846</b>	<b>4,564,412</b>	<b>244,671</b>	<b>18,817</b>	<b>=</b>	<b>4,827,900</b>	<b>10,546</b>	<b>5,698</b>	<b>2,810</b>	<b>=</b>	<b>19,054</b>	<b>=</b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.2. Financial instruments under simplified approach by day-past-due categories****As at 31 December 2025**

	<b>Without delay</b>	<b>&lt; 30 days</b>	<b>31 - 60 days</b>	<b>61 - 90 days</b>	<b>&gt; 91 days</b>	<b>Closing balance</b>
<b>Expected credit loss rate</b>	<b>0.57%</b>	<b>1.28%</b>	<b>1.22%</b>	<b>18.53%</b>	<b>35.52%</b>	<b>1.87%</b>
Gross value	206,980	3,365	1,633	232	7,934	220,144
Loss allowance	<u>(1,186)</u>	<u>(43)</u>	<u>(20)</u>	<u>(43)</u>	<u>(2,818)</u>	<u>(4,110)</u>
<b>Net carrying value</b>	<b><u>205,794</u></b>	<b><u>3,322</u></b>	<b><u>1,613</u></b>	<b><u>189</u></b>	<b><u>5,116</u></b>	<b><u>216,034</u></b>

**As at 31 December 2024**

	<b>Without delay</b>	<b>&lt; 30 days</b>	<b>31 - 60 days</b>	<b>61 - 90 days</b>	<b>&gt; 91 days</b>	<b>Closing balance</b>
<b>Expected credit loss rate</b>	<b>0.62%</b>	<b>2.17%</b>	<b>14.39%</b>	<b>20.10%</b>	<b>18.30%</b>	<b>2.18%</b>
Gross value	195,603	3,133	278	5,195	12,981	217,190
Loss allowance	<u>(1,215)</u>	<u>(68)</u>	<u>(40)</u>	<u>(1,044)</u>	<u>(2,376)</u>	<u>(4,743)</u>
<b>Net carrying value</b>	<b><u>194,388</u></b>	<b><u>3,065</u></b>	<b><u>238</u></b>	<b><u>4,151</u></b>	<b><u>10,605</u></b>	<b><u>212,447</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.3. Changes in the Gross carrying amount and in the Loss allowance of financial assets at amortised cost and fair value through other comprehensive income by IFRS 9 stages****Movement of gross carrying amount of loans at amortised cost**

	Stage 1	Stage 2	Stage 3	POCI	Total
<b>Gross amount as at 1 January 2024</b>	<b>3,845,710</b>	<b>881,886</b>	<b>90,068</b>	<b>11,110</b>	<b>4,828,774</b>
Transfer to Stage 1	207,208	(206,065)	(1,143)	-	-
Transfer to Stage 2	(298,847)	304,330	(5,483)	-	-
Transfer to Stage 3	(19,401)	(50,105)	69,506	-	-
New financial assets originated or purchased	2,055,367	211,096	23,084	887	2,290,434
Financial assets derecognised (other than write-offs)	(1,964,151)	(266,323)	(59,192)	(1,411)	(2,291,077)
Write-offs	(59)	(748)	(9,348)	(436)	(10,591)
Modification loss	<u>(1,607)</u>	<u>(246)</u>	<u>(146)</u>	-	<u>(1,999)</u>
<b>Gross amount as at 31 December 2024</b>	<b><u>3,824,220</u></b>	<b><u>873,825</u></b>	<b><u>107,346</u></b>	<b><u>10,150</u></b>	<b><u>4,815,541</u></b>
Transfer to Stage 1	246,948	(246,265)	(683)	-	-
Transfer to Stage 2	(268,298)	272,975	(4,677)	-	-
Transfer to Stage 3	(16,909)	(25,365)	42,274	-	-
New financial assets originated or purchased	2,569,524	154,924	25,235	430	2,750,113
Financial assets derecognised (other than write-offs)	(1,949,825)	(269,698)	(58,788)	(9,081)	(2,287,392)
Write-offs	(66)	(464)	(6,712)	(10)	(7,252)
Modification loss	<u>(1,204)</u>	<u>(173)</u>	<u>(93)</u>	-	<u>(1,470)</u>
<b>Gross amount as at 31 December 2025</b>	<b><u>4,404,390</u></b>	<b><u>759,759</u></b>	<b><u>103,902</u></b>	<b><u>1,489</u></b>	<b><u>5,269,540</u></b>

**Movement of loss allowance of loans at amortised cost**

	Stage 1	Stage 2	Stage 3	POCI	Total
<b>Loss allowance as at 1 January 2024</b>	<b>33,709</b>	<b>69,823</b>	<b>42,925</b>	<b>958</b>	<b>147,415</b>
Transfer to Stage 1	13,671	(13,257)	(414)	-	-
Transfer to Stage 2	(5,585)	8,191	(2,606)	-	-
Transfer to Stage 3	(679)	(4,925)	5,604	-	-
Net remeasurement of loss allowance	(18,250)	16,198	14,550	(4)	12,494
New financial assets originated or purchased	12,785	8,225	3,944	-	24,954
Financial assets derecognised (other than write-offs)	(10,013)	(10,244)	(12,744)	(38)	(33,039)
Unwind of discount	-	-	3,494	19	3,513
Write-offs	<u>(59)</u>	<u>(748)</u>	<u>(9,348)</u>	<u>(436)</u>	<u>(10,591)</u>
<b>Loss allowance as at 31 December 2024</b>	<b><u>25,579</u></b>	<b><u>73,263</u></b>	<b><u>45,405</u></b>	<b><u>499</u></b>	<b><u>144,746</u></b>
Transfer to Stage 1	17,209	(16,968)	(241)	-	-
Transfer to Stage 2	(2,644)	4,487	(1,843)	-	-
Transfer to Stage 3	(413)	(3,644)	4,057	-	-
Net remeasurement of loss allowance	(17,857)	17,980	(2,204)	(30)	(2,111)
New financial assets originated or purchased	16,700	7,105	4,932	-	28,737
Financial assets derecognised (other than write-offs)	(7,306)	(16,321)	(9,127)	(402)	(33,156)
Unwind of discount	-	-	3,242	10	3,252
Write-offs	<u>(66)</u>	<u>(464)</u>	<u>(6,712)</u>	<u>(10)</u>	<u>(7,252)</u>
<b>Loss allowance as at 31 December</b>	<b><u>31,202</u></b>	<b><u>65,438</u></b>	<b><u>37,509</u></b>	<b><u>67</u></b>	<b><u>134,216</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.3. Changes in the Gross carrying amount and in the Loss allowance of financial assets at amortised cost and fair value through other comprehensive income by IFRS 9 stages [continued]****Movement of gross carrying amount of loan commitments and financial guarantees**

	Stage 1	Stage 2	Stage 3	Total
<b>Gross amount as at 1 January 2024</b>	<b>4,158,769</b>	<b>190,242</b>	<b>13,082</b>	<b>4,362,093</b>
Transfer to Stage 1	77,066	(76,623)	(443)	-
Transfer to Stage 2	(126,264)	126,793	(529)	-
Transfer to Stage 3	(4,040)	(8,337)	12,377	-
New financial assets originated or purchased	1,450,771	86,641	2,874	1,540,286
Financial assets derecognised (other than write-offs)	<u>(991,890)</u>	<u>(74,045)</u>	<u>(8,544)</u>	<u>(1,074,479)</u>
<b>Gross amount as at 31 December 2024</b>	<b><u>4,564,412</u></b>	<b><u>244,671</u></b>	<b><u>18,817</u></b>	<b><u>4,827,900</u></b>
Transfer to Stage 1	89,377	(89,231)	(146)	-
Transfer to Stage 2	(106,140)	106,453	(313)	-
Transfer to Stage 3	(2,543)	(1,677)	4,220	-
New financial assets originated or purchased	1,867,337	23,320	2,445	1,893,102
Financial assets derecognised (other than write-offs)	<u>(1,138,682)</u>	<u>(109,460)</u>	<u>(12,342)</u>	<u>(1,260,484)</u>
<b>Gross amount as at 31 December 2025</b>	<b><u>5,273,761</u></b>	<b><u>174,076</u></b>	<b><u>12,681</u></b>	<b><u>5,460,518</u></b>

**Movement of loss allowance of loan commitments and financial guarantees**

	Stage 1	Stage 2	Stage 3	Total
<b>Loss allowance as at 1 January 2024</b>	<b>8,695</b>	<b>4,671</b>	<b>2,725</b>	<b>16,091</b>
Transfer to Stage 1	2,223	(2,156)	(67)	-
Transfer to Stage 2	(565)	641	(76)	-
Transfer to Stage 3	(12)	(167)	179	-
Net remeasurement of loss allowance	(3,935)	1,864	240	(1,831)
New financial assets originated or purchased	6,100	1,244	456	7,800
Decrease	<u>(1,960)</u>	<u>(399)</u>	<u>(647)</u>	<u>(3,006)</u>
<b>Loss allowance as at 31 December 2024</b>	<b><u>10,546</u></b>	<b><u>5,698</u></b>	<b><u>2,810</u></b>	<b><u>19,054</u></b>
Transfer to Stage 1	2,400	(2,373)	(26)	1
Transfer to Stage 2	(343)	371	(28)	-
Transfer to Stage 3	(12)	(31)	43	-
Net remeasurement of loss allowance	(3,378)	1,732	(74)	(1,720)
New financial assets originated or purchased	5,353	309	196	5,858
Decrease	<u>(1,461)</u>	<u>(893)</u>	<u>(1,424)</u>	<u>(3,778)</u>
<b>Loss allowance as at 31 December 2025</b>	<b><u>13,105</u></b>	<b><u>4,813</u></b>	<b><u>1,497</u></b>	<b><u>19,415</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.3. Changes in the Gross carrying amount and in the Loss allowance of financial assets at amortised cost and fair value through other comprehensive income by IFRS 9 stages [continued]****Movement of gross carrying amount of cash, amounts due from banks and balances with the National Bank of Hungary**

	Stage 1	Stage 2	Total
<b>Gross amount as at 1 January 2024</b>	<b>2,701,675</b>	<b>6,952</b>	<b>2,708,627</b>
New financial assets originated or purchased	1,991,832	26,196	2,018,028
Financial assets derecognised (other than write-offs)	<u>(2,648,879)</u>	<u>(484)</u>	<u>(2,649,363)</u>
<b>Gross amount as at 31 December 2024</b>	<b><u>2,044,628</u></b>	<b><u>32,664</u></b>	<b><u>2,077,292</u></b>
New financial assets originated or purchased	1,501,442	803	1,502,245
Financial assets derecognised (other than write-offs)	<u>(2,192,077)</u>	<u>(25,571)</u>	<u>(2,217,648)</u>
<b>Gross amount as at 31 December 2025</b>	<b><u>1,353,993</u></b>	<b><u>7,896</u></b>	<b><u>1,361,889</u></b>

**Movement of loss allowance of cash, amounts due from banks and balances with the National Bank of Hungary**

	Stage 1	Stage 2	Total
<b>Loss allowance as at 1 January 2024</b>	<b>267</b>	<b>128</b>	<b>395</b>
Net remeasurement of loss allowance	(197)	134	(63)
New financial assets originated or purchased	1,808	-	1,808
Financial assets derecognised (other than write-offs)	<u>(27)</u>	<u>-</u>	<u>(27)</u>
<b>Loss allowance as at 31 December 2024</b>	<b><u>1,851</u></b>	<b><u>262</u></b>	<b><u>2,113</u></b>
Net remeasurement of loss allowance	212	(186)	26
New financial assets originated or purchased	1	-	1
Financial assets derecognised (other than write-offs)	<u>(11)</u>	<u>-</u>	<u>(11)</u>
<b>Loss allowance as at 31 December 2025</b>	<b><u>2,053</u></b>	<b><u>76</u></b>	<b><u>2,129</u></b>

**Movement of gross carrying amount of placements with other banks**

	Stage 1	Stage 2	Stage 3	Total
<b>Gross amount as at 1 January 2024</b>	<b>2,697,572</b>	<b>9,421</b>	<b>2,315</b>	<b>2,709,308</b>
Transfer to Stage 2	-	887	(887)	-
New financial assets originated or purchased	1,165,384	1,990	-	1,167,374
Financial assets derecognised (other than write-offs)	<u>(921,989)</u>	<u>(645)</u>	<u>(293)</u>	<u>(922,927)</u>
<b>Gross amount as at 31 December 2024</b>	<b><u>2,940,967</u></b>	<b><u>11,653</u></b>	<b><u>1,135</u></b>	<b><u>2,953,755</u></b>
New financial assets originated or purchased	1,190,773	538	-	1,191,311
Financial assets derecognised (other than write-offs)	<u>(977,117)</u>	<u>(2,365)</u>	<u>(150)</u>	<u>(979,632)</u>
<b>Gross amount as at 31 December 2025</b>	<b><u>3,154,623</u></b>	<b><u>9,826</u></b>	<b><u>985</u></b>	<b><u>3,165,434</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.3. Changes in the Gross carrying amount and in the Loss allowance of financial assets at amortised cost and fair value through other comprehensive income by IFRS 9 stages [continued]****Movement of loss allowance of placements with other banks**

	Stage 1	Stage 2	Stage 3	Total
<b>Loss allowance as at 1 January 2024</b>	<b>3,465</b>	<b>1,095</b>	<b>2,315</b>	<b>6,875</b>
Transfer to Stage 2	-	887	(887)	-
Net remeasurement of loss allowance	(725)	(649)	(293)	(1,667)
New financial assets originated or purchased	864	-	-	864
Financial assets derecognised (other than write-offs)	(853)	-	-	(853)
<b>Loss allowance as at 31 December 2024</b>	<b><u>2,751</u></b>	<b><u>1,333</u></b>	<b><u>1,135</u></b>	<b><u>5,219</u></b>
Net remeasurement of loss allowance	(912)	(134)	(150)	(1,196)
New financial assets originated or purchased	594	-	-	594
Financial assets derecognised (other than write-offs)	(727)	-	-	(727)
<b>Loss allowance as at 31 December 2025</b>	<b><u>1,706</u></b>	<b><u>1,199</u></b>	<b><u>985</u></b>	<b><u>3,890</u></b>

**Movement of gross carrying amount of repo receivables**

	Stage 1	Total
<b>Gross amount as at 1 January 2024</b>	<b>202,025</b>	<b>202,025</b>
New financial assets originated or purchased	1,065,205	1,065,205
Financial assets derecognised (other than write-offs)	(1,028,797)	(1,028,797)
<b>Gross amount as at 31 December 2024</b>	<b><u>238,433</u></b>	<b><u>238,433</u></b>
New financial assets originated or purchased	2,498,953	2,498,953
Financial assets derecognised (other than write-offs)	(2,414,817)	(2,414,817)
<b>Gross amount as at 31 December 2025</b>	<b><u>322,569</u></b>	<b><u>322,569</u></b>

**Movement of loss allowance of repo receivables**

	Stage 1	Total
<b>Loss allowance as at 1 January 2024</b>	<b>367</b>	<b>367</b>
New financial assets originated or purchased	2,255	2,255
Financial assets derecognised (other than write-offs)	(2,268)	(2,268)
<b>Loss allowance as at 31 December 2024</b>	<b><u>354</u></b>	<b><u>354</u></b>
New financial assets originated or purchased	3,487	3,487
Financial assets derecognised (other than write-offs)	(3,640)	(3,640)
<b>Loss allowance as at 31 December 2025</b>	<b><u>201</u></b>	<b><u>201</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.3. Changes in the Gross carrying amount and in the Loss allowance of financial assets at amortised cost and fair value through other comprehensive income by IFRS 9 stages [continued]****Movement of gross carrying amount of securities at amortised cost**

	Stage 1	Stage 2	Stage 3	Total
<b>Gross amount as at 1 January 2024</b>	<b>2,696,310</b>	<b>5,961</b>	<b>34,802</b>	<b>2,737,073</b>
New financial assets originated or purchased	925,394	-	3,809	929,203
Financial assets derecognised (other than write-offs)	(291,655)	(445)	(1,120)	(293,220)
<b>Gross amount as at 31 December 2024</b>	<b><u>3,330,049</u></b>	<b><u>5,516</u></b>	<b><u>37,491</u></b>	<b><u>3,373,056</u></b>
Transfer to Stage 2	(14,355)	14,355	-	-
New financial assets originated or purchased	835,265	237	-	835,502
Financial assets derecognised (other than write-offs)	(794,969)	(916)	(14,697)	(810,582)
<b>Gross amount as at 31 December 2025</b>	<b><u>3,355,990</u></b>	<b><u>19,192</u></b>	<b><u>22,794</u></b>	<b><u>3,397,976</u></b>

**Movement of loss allowance of securities at amortised cost**

	Stage 1	Stage 2	Stage 3	Total
<b>Loss allowance as at 1 January 2024</b>	<b>13,350</b>	<b>273</b>	<b>12,602</b>	<b>26,225</b>
Net remeasurement of loss allowance	(3,307)	232	14,792	11,717
New financial assets originated or purchased	1,420	-	1,050	2,470
Financial assets derecognised (other than write-offs)	(406)	-	(1,095)	(1,501)
<b>Loss allowance as at 31 December 2024</b>	<b><u>11,057</u></b>	<b><u>505</u></b>	<b><u>27,349</u></b>	<b><u>38,911</u></b>
Transfer to Stage 2	(68)	68	-	-
Net remeasurement of loss allowance	(594)	914	(2,153)	(1,833)
New financial assets originated or purchased	594	-	-	594
Financial assets derecognised (other than write-offs)	(1,926)	-	(5,857)	(7,783)
<b>Loss allowance as at 31 December 2025</b>	<b><u>9,063</u></b>	<b><u>1,487</u></b>	<b><u>19,339</u></b>	<b><u>29,889</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.3. Changes in the Gross carrying amount and in the Loss allowance of financial assets at amortised cost and fair value through other comprehensive income by IFRS 9 stages [continued]****Movement of gross carrying amount of FVOCI debt instruments**

	Stage 1	Stage 3	Total
<b>Gross amount as at 1 January 2024</b>	<b>507,477</b>	<b>30,873</b>	<b>538,350</b>
New financial assets originated or purchased	151,534	27	151,561
Financial assets derecognised (other than write-offs)	(121,866)	(9,377)	(131,243)
<b>Gross amount as at 31 December 2024</b>	<b><u>537,145</u></b>	<b><u>21,523</u></b>	<b><u>558,668</u></b>
New financial assets originated or purchased	821,536	-	821,536
Financial assets derecognised (other than write-offs)	(147,380)	(11,310)	(158,690)
<b>Gross amount as at 31 December 2025</b>	<b><u>1,211,301</u></b>	<b><u>10,213</u></b>	<b><u>1,221,514</u></b>

**Movement of loss allowance of FVOCI debt instruments**

	Stage 1	Stage 3	Total
<b>Loss allowance as at 1 January 2024</b>	<b>1,425</b>	<b>22,920</b>	<b>24,345</b>
Net remeasurement of loss allowance	(404)	28,373	27,969
New financial assets originated or purchased	98	-	98
Financial assets derecognised (other than write-offs)	(116)	-	(116)
<b>Loss allowance as at 31 December 2024</b>	<b><u>1,003</u></b>	<b><u>51,293</u></b>	<b><u>52,296</u></b>
Net remeasurement of loss allowance	23	(3,051)	(3,028)
New financial assets originated or purchased	1,875	-	1,875
Financial assets derecognised (other than write-offs)	(118)	(4,093)	(4,211)
<b>Loss allowance as at 31 December 2025</b>	<b><u>2,783</u></b>	<b><u>44,149</u></b>	<b><u>46,932</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.4. Loan portfolio by internal ratings**

Internal rating grade	Gross carrying amount				Total
	Stage1	Stage2	Stage3	POCI	
High grade (1-4)	2,414,137	206,864	-	303	2,621,304
Medium grade (5-7)	1,931,700	373,625	-	364	2,305,689
Low grade (8-9)	58,553	179,270	-	164	237,987
Non performing	=	=	<u>103,902</u>	<u>658</u>	<u>104,560</u>
<b>Total</b>	<b><u>4,404,390</u></b>	<b><u>759,759</u></b>	<b><u>103,902</u></b>	<b><u>1,489</u></b>	<b><u>5,269,540</u></b>

Internal rating grade	Accumulated loss allowance				Total
	Stage1	Stage2	Stage3	POCI	
High grade (1-4)	9,601	12,622	-	-	22,223
Medium grade (5-7)	19,199	28,065	-	1	47,265
Low grade (8-9)	2,402	24,751	-	1	27,154
Non performing	=	=	<u>37,509</u>	<u>65</u>	<u>37,574</u>
<b>Total</b>	<b><u>31,202</u></b>	<b><u>65,438</u></b>	<b><u>37,509</u></b>	<b><u>67</u></b>	<b><u>134,216</u></b>

Internal rating grade	Gross carrying amount				Total
	Stage1	Stage2	Stage3	POCI	
High grade (1-4)	2,178,673	149,572	-	300	2,328,545
Medium grade (5-7)	1,593,671	535,102	-	8,894	2,137,667
Low grade (8-9)	51,876	189,151	-	275	241,302
Non performing	=	=	<u>107,346</u>	<u>681</u>	<u>108,027</u>
<b>Total</b>	<b><u>3,824,220</u></b>	<b><u>873,825</u></b>	<b><u>107,346</u></b>	<b><u>10,150</u></b>	<b><u>4,815,541</u></b>

Internal rating grade	Accumulated loss allowance				Total
	Stage1	Stage2	Stage3	POCI	
High grade (1-4)	7,914	7,804	-	1	15,719
Medium grade (5-7)	15,382	42,146	-	382	57,910
Low grade (8-9)	2,283	23,313	-	3	25,599
Non performing	=	=	<u>45,405</u>	<u>113</u>	<u>45,518</u>
<b>Total</b>	<b><u>25,579</u></b>	<b><u>73,263</u></b>	<b><u>45,405</u></b>	<b><u>499</u></b>	<b><u>144,746</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.5. Loan portfolio by countries**

An analysis of carrying amount of the non-qualified and qualified gross loan portfolio by country is as follows:

Country	31 December 2025		31 December 2024	
	Gross loan and placements with other banks portfolio	Loss allowance	Gross loan and placements with other banks portfolio	Loss allowance
Hungary	6,360,896	(121,999)	5,918,775	(123,772)
Bulgaria	456,712	(4,198)	470,979	(5,192)
Malta	452,947	(509)	488,110	(260)
Serbia	332,150	(1,342)	295,129	(8,132)
Croatia	274,083	(310)	257,233	(432)
France	156,776	(93)	66,514	(59)
Germany	122,156	(714)	53,597	(220)
Montenegro	102,727	(157)	29,711	(72)
Romania	99,065	(1,689)	86,305	(1,572)
Netherlands	62,212	(844)	17,655	(185)
Other	<u>337,819</u>	<u>(6,452)</u>	<u>323,721</u>	<u>(10,423)</u>
<b>Loans, placements with other banks and repo receivables at amortised cost total</b>	<b><u>8,757,543</u></b>	<b><u>(138,307)</u></b>	<b><u>8,007,729</u></b>	<b><u>(150,319)</u></b>
Hungary	1,082,668	-	998,388	-
Other	<u>20</u>	-	<u>22</u>	-
<b>Loans at fair value total</b>	<b><u>1,082,688</u></b>	<b>-</b>	<b><u>998,410</u></b>	<b>-</b>
<b>Loans, placements with other banks and repo receivables</b>	<b><u>9,840,231</u></b>	<b><u>(138,307)</u></b>	<b><u>9,006,139</u></b>	<b><u>(150,319)</u></b>

**36.1.6. Loan portfolio classification by economic activities**

Loans at amortised cost by economic activities	31 December 2025		31 December 2024	
	Gross amount	Loss allowance	Gross amount	Loss allowance
Retail	844,972	50,981	751,980	50,950
Agriculture, forestry and fishing	222,683	5,014	227,377	5,330
Manufacturing, mining and quarrying and other industry	689,822	14,886	543,565	20,407
Construction	179,808	7,267	238,030	10,016
Wholesale and retail trade, transportation and storage accommodation and food	931,022	21,286	737,154	17,837
Information and communication	7,295	237	49,521	1,127
Financial and insurance activities	59,911	968	938,462	4,703
Real estate activities	957,338	6,461	522,669	16,852
Professional, scientific, technical, Public administration, defence, education, human health and	1,008,513	19,851	264,107	5,020
Other services	<u>157,675</u>	<u>3,754</u>	<u>124,419</u>	<u>2,112</u>
<b>Total</b>	<b><u>5,269,540</u></b>	<b><u>134,216</u></b>	<b><u>4,815,541</u></b>	<b><u>144,746</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.7. Collaterals**

The collateral value held by the Bank by collateral types is as follows (**total collateral value**). The collaterals cover loans as well as off-balance sheet exposures.

**Held collaterals at book value by type of collateral**

<b>Types of collateral</b>	<b>31 December 2025</b>	<b>31 December 2024</b>
Mortgages	2,294,575	2,186,450
Guarantees and warranties	2,257,495	2,078,055
Deposit	207,247	281,685
<i>from this: Cash</i>	85,393	96,455
<i>Securities</i>	121,854	185,230
Other	65	91
<b>Total</b>	<b><u>4,759,382</u></b>	<b><u>4,546,281</u></b>

**Held collaterals at fair value by type of collateral**

<b>Types of collateral</b>	<b>31 December 2025</b>	<b>31 December 2024</b>
Mortgages	3,852,672	3,599,440
Guarantees and warranties	2,138,387	2,011,616
Deposit	677,157	624,618
<i>from this: Cash</i>	125,918	156,366
<i>Securities</i>	551,239	468,252
Other	65	91
<b>Total</b>	<b><u>6,668,281</u></b>	<b><u>6,235,765</u></b>

The collateral value held by the Bank by collateral types is as follows (**to the extent of the exposures**). The collaterals cover loans as well as off-balance sheet exposures.

<b>Types of collateral</b>	<b>31 December 2025</b>	<b>31 December 2024</b>
Mortgage	1,649,513	1,587,521
Guarantees and warranties	1,951,604	1,847,223
Deposit	498,847	134,425
<i>from this: Cash</i>	123,300	80,359
<i>Securities</i>	375,547	54,066
Other	65	91
<b>Total</b>	<b><u>4,100,029</u></b>	<b><u>3,569,260</u></b>

The coverage level of loan portfolio to the extent of the exposures increased from 45,94% to 48,61% as at 31 December 2025, while the coverage to the total collateral value decreased from 58,52% to 56,42%.

The collateral value (**total collateral value**) held by the Bank related to impaired loan portfolio (Stage 3 and POCI loans) is as follows:

<b>For the year ended 31 December 2025</b>	<b>Gross carrying amount</b>	<b>Loss allowance</b>	<b>Carrying amount</b>	<b>Collateral value</b>
Retail consumer loans	19,675	(11,878)	7,797	4,584
Mortgage loans	3,744	(417)	3,327	17,717
Corporate loans	<u>81,972</u>	<u>(25,281)</u>	<u>56,691</u>	<u>135,818</u>
<b>Total</b>	<b><u>105,391</u></b>	<b><u>(37,576)</u></b>	<b><u>67,815</u></b>	<b><u>158,119</u></b>
<b>For the year ended 31 December 2024</b>	<b>Gross carrying amount</b>	<b>Loss allowance</b>	<b>Carrying amount</b>	<b>Collateral value</b>
Retail consumer loans	18,904	(12,058)	6,846	4,655
Mortgage loans	5,480	(641)	4,839	24,668
Corporate loans	<u>93,112</u>	<u>(33,205)</u>	<u>59,907</u>	<u>122,681</u>
<b>Total</b>	<b><u>117,496</u></b>	<b><u>(45,904)</u></b>	<b><u>71,592</u></b>	<b><u>152,004</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.7. Collaterals [continued]****Maximum exposure to credit risk as at 31 December 2025**

	Maximum exposure to credit risk	Cash	Securities	Guarantees	Fair value of collateral		Offsetting arrangements	Surplus	Collateral total	Net exposure	Coverage	ECL
					Property	Other						
Cash, amounts due from banks and balances with the National Bank of Hungary	1,359,760	-	-	-	-	-	-	-	-	1,359,760	-	2,129
Placements with other banks	3,161,544	-	-	99,350	-	-	-	-1,474	97,876	3,063,668	3%	3,890
Repo receivables	322,368	-	324,758	-	-	-	-	-3,616	321,142	1,226	100%	201
<i>Retail consumer loans</i>	760,810	49	1,190	1,033	13,724	-	-	-10,944	5,052	755,758	1%	50,687
<i>Mortgage loans</i>	37,000	-	-	1,932	308,645	-	-	-273,661	36,916	84	100%	493
<i>Municipal loans</i>	75,695	3	-	6,809	9,130	-	-	-6,020	9,922	65,773	13%	1,979
<i>Corporate loans</i>	7,585,727	46,337	223,598	981,991	3,288,850	1,052	-	-2,143,819	2,398,009	5,187,718	32%	95,693
Loans at amortised cost	8,459,232	46,389	224,788	991,765	3,620,349	1,052	-	-2,434,444	2,449,899	6,009,333	29%	148,852
Securities at amortised cost	3,368,087	-	-	-	-	-	-	-	-	3,368,087	-	29,889
<b>Financial assets at amortised cost total</b>	<b>16,670,991</b>	<b>46,389</b>	<b>549,546</b>	<b>1,091,115</b>	<b>3,620,349</b>	<b>1,052</b>	-	<b>-2,439,534</b>	<b>2,868,917</b>	<b>13,802,074</b>	<b>17%</b>	<b>184,961</b>
Derivative financial assets	185,762	43,413	-	-	-	-	32,501	-	75,914	109,848	41%	-
Held-for-trading financial assets	157,207	-	-	-	-	-	-	-	-	157,207	0%	-
mFVTPL loans	1,082,688	-	-	986,377	26,138	-	-	-28,711	983,804	98,884	91%	-
<b>Financial assets at fair value through profit or loss total</b>	<b>1,425,657</b>	<b>43,413</b>	-	<b>986,377</b>	<b>26,138</b>	-	<b>32,501</b>	<b>-28,711</b>	<b>1,059,718</b>	<b>365,939</b>	<b>74%</b>	-
FVOCI debt instruments	1,221,514	-	-	-	-	-	-	-	-	1,221,514	0%	46,932
<b>FVOCI debt instruments total</b>	<b>1,221,514</b>	-	-	-	-	-	-	-	-	<b>1,221,514</b>	<b>0%</b>	<b>46,932</b>
<b>Financial assets total</b>	<b>19,318,162</b>	<b>89,802</b>	<b>549,546</b>	<b>2,077,492</b>	<b>3,646,487</b>	<b>1,052</b>	<b>32,501</b>	<b>-2,468,245</b>	<b>3,928,635</b>	<b>15,389,527</b>	<b>20%</b>	<b>231,893</b>
Financial guarantees	2,099,791	34,598	1,693	60,895	203,714	-	-	-100,007	200,893	1,898,898	10%	4,590
Accreditive	17,404	1,518	-	-	1,419	-	-	-	2,937	14,467	17%	189
<b>Off-balance sheet items total</b>	<b>2,117,195</b>	<b>36,116</b>	<b>1,693</b>	<b>60,895</b>	<b>205,133</b>	-	-	<b>-100,007</b>	<b>203,830</b>	<b>1,913,365</b>	<b>10%</b>	<b>4,779</b>
<b>Total</b>	<b>21,435,357</b>	<b>125,918</b>	<b>551,239</b>	<b>2,138,387</b>	<b>3,851,620</b>	<b>1,052</b>	<b>32,501</b>	<b>-2,568,252</b>	<b>4,132,465</b>	<b>17,302,892</b>	<b>19%</b>	<b>236,672</b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.7. Collaterals [continued]****Maximum exposure to credit risk as at 31 December 2024**

	Maximum exposure to credit risk	Cash	Securities	Guarantees	Fair value of collateral		Offsetting arrangements	Surplus	Collateral total	Net exposure	Coverage	ECL
					Property	Other						
Cash, amounts due from banks and balances with the National Bank of Hungary	2,075,179	-	-	-	-	-	-	-	-	2,075,179	-	2,113
Placements with other banks	2,948,536	-	-	106,264	-	-	-	(3,386)	102,878	2,845,658	3%	5,219
Repo receivables	238,079	-	250,481	-	-	-	-	(14,172)	236,309	1,770	99%	354
<i>Retail consumer loans</i>	659,121	2	459	969	11,848	-	-	(8,677)	4,601	654,520	1%	50,893
<i>Mortgage loans</i>	45,849	-	-	2,179	357,694	-	-	(314,082)	45,791	58	100%	752
<i>Municipal loans</i>	102,852	3	-	8,170	10,295	-	-	(6,412)	12,056	90,796	12%	1,765
<i>Corporate loans</i>	6,769,406	38,644	215,778	953,328	3,034,451	14	-	(2,056,891)	2,185,324	4,584,082	32%	103,904
Loans at amortised cost	7,577,228	38,649	216,237	964,646	3,414,288	14	-	(2,386,062)	2,247,772	5,329,456	30%	157,314
Securities at amortised cost	3,334,145	-	-	-	-	-	-	-	-	3,334,145	-	38,911
<b>Financial assets at amortised cost total</b>	<b>16,173,167</b>	<b>38,649</b>	<b>466,718</b>	<b>1,070,910</b>	<b>3,414,288</b>	<b>14</b>	-	<b>(2,403,620)</b>	<b>2,586,959</b>	<b>13,586,208</b>	<b>16%</b>	<b>203,911</b>
Derivative financial assets	214,191	74,570	-	-	-	-	54,939	-	129,509	84,682	60%	-
Held-for-trading financial assets	446,796	-	-	-	-	-	-	-	-	446,796	-	-
mFVTPL loans	998,410	-	-	897,781	-	-	-	(38,979)	858,802	139,608	86%	-
<b>Financial assets at fair value through profit or loss total</b>	<b>1,659,397</b>	<b>74,570</b>	-	<b>897,781</b>	-	-	<b>54,939</b>	<b>(38,979)</b>	<b>988,311</b>	<b>671,086</b>	<b>60%</b>	-
FVOCI debt instruments	558,668	-	-	-	-	-	-	-	-	558,668	-	52,296
<b>FVOCI debt instruments total</b>	<b>558,668</b>	-	-	-	-	-	-	-	-	<b>558,668</b>	<b>0%</b>	<b>52,296</b>
<b>Financial assets total</b>	<b>18,391,232</b>	<b>113,219</b>	<b>466,718</b>	<b>1,968,691</b>	<b>3,414,288</b>	<b>14</b>	<b>54,939</b>	<b>(2,442,599)</b>	<b>3,575,270</b>	<b>14,815,962</b>	<b>19%</b>	<b>256,207</b>
Financial guarantees	1,897,269	43,147	1,534	42,925	184,743	-	-	(61,814)	210,535	1,686,734	11%	6,449
Accreditive	5,144	-	-	-	395	-	-	-	395	4,749	8%	37
<b>Off-balance sheet items total</b>	<b>1,902,413</b>	<b>43,147</b>	<b>1,534</b>	<b>42,925</b>	<b>185,138</b>	-	-	<b>(61,814)</b>	<b>210,930</b>	<b>1,691,483</b>	<b>11%</b>	<b>6,486</b>
<b>Total</b>	<b>20,293,645</b>	<b>156,366</b>	<b>468,252</b>	<b>2,011,616</b>	<b>3,599,426</b>	<b>14</b>	<b>54,939</b>	<b>(2,504,413)</b>	<b>3,786,200</b>	<b>16,507,445</b>	<b>19%</b>	<b>262,693</b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.7. Collaterals**

Returns from realization of collaterals taken into possession by types of collateral

<b>Types of collateral</b>	<b>31 December 2025</b>	<b>31 December 2024</b>
Real estate	458	128
Guarantee	24,740	33,402
Bail	99	31
Other	<u>111</u>	<u>140</u>
<b>Proceeds from enforcement of collaterals</b>	<b><u>25,408</u></b>	<b><u>33,701</u></b>

**36.1.8. Restructured loans**

	<b>31 December 2025</b>		<b>31 December 2024</b>	
	<b>Gross portfolio</b>	<b>Loss allowance</b>	<b>Gross portfolio</b>	<b>Loss allowance</b>
Consumer loans	20,893	(10,274)	17,632	(8,727)
Mortgage loans	1,033	(19)	1,528	(25)
Corporate loans	33,989	(3,137)	64,551	(4,857)
SME loans	5,842	(526)	13,605	(892)
Municipal loans	=	=	<u>81</u>	<u>(2)</u>
<b>Total</b>	<b><u>61,757</u></b>	<b><u>(13,957)</u></b>	<b><u>97,397</u></b>	<b><u>(14,503)</u></b>

**Restructured portfolio definition**

The forbore definition used by the Bank is based on EU 2015/227 regulation.

Restructuring (forbearance) is a modification of the contract – initiated by either the client or the bank – that provides a concession or allowance towards the client in respect to the client's current or future financial difficulties. The table of restructured loans contains exposures classified as performing forbore. An exposure is considered performing forbore if the conditions of the non-performing status are not met at the time of the restructuring, or the exposure fulfilled the requirements of the minimum one-year cure period as non-performing forbore.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.9. Financial instruments by rating categories<sup>1</sup>**

Held-for-trading securities as at 31 December 2025															
	A1	A2	A3	Aa1	Aa2	Aa3	Aaa	Ba1	Ba2	Ba3	Baa1	Baa2	Baa3	Not Rated	Total
Government bonds	39	1,647	804	61	-	9,135	20	-	731	4,522	199	94,110	8,346	-	119,614
Other bonds	-	-	-	-	-	-	-	249	-	-	433	6,002	872	12,045	19,601
Investment fund units	-	-	-	-	-	-	-	-	-	-	-	-	-	479	479
Hungarian government discounted Treasury Bills	-	-	-	-	-	-	-	-	-	-	-	17,389	-	-	17,389
Shares	18	21	26	-	20	15	-	-	193	11	81	17	8	1,577	1,987
Mortgage bonds	98	-	-	-	-	-	-	-	-	-	-	-	17	9	124
<b>Total</b>	<b><u>155</u></b>	<b><u>1,668</u></b>	<b><u>830</u></b>	<b><u>61</u></b>	<b><u>20</u></b>	<b><u>9,150</u></b>	<b><u>20</u></b>	<b><u>249</u></b>	<b><u>924</u></b>	<b><u>4,533</u></b>	<b><u>713</u></b>	<b><u>117,518</u></b>	<b><u>9,243</u></b>	<b><u>14,110</u></b>	<b><u>159,194</u></b>

**Held-for-trading securities as at 31 December 2024**

	A1	A2	A3	Aa2	Aa3	Aaa	Ba1	Ba2	Ba3	Baa1	Baa2	Baa3	Not Rated	Total
Government bonds	-	2,499	950	-	3,025	2,327	-	1,648	1,707	-	41,843	3,499	-	57,498
Other bonds	-	-	173	-	-	-	1,183	-	-	-	4,287	472	382,482	388,597
Investment fund units	-	-	-	-	-	-	-	-	-	-	-	-	377	377
Hungarian government discounted Treasury Bills	-	-	-	-	-	-	-	-	-	-	207	-	-	207
Shares	17	42	52	12	11	-	145	-	5	22	56	54	781	1,197
Mortgage bonds	93	-	-	-	-	-	-	-	-	-	-	15	9	117
<b>Total</b>	<b><u>110</u></b>	<b><u>2,541</u></b>	<b><u>1,175</u></b>	<b><u>12</u></b>	<b><u>3,036</u></b>	<b><u>2,327</u></b>	<b><u>1,328</u></b>	<b><u>1,648</u></b>	<b><u>1,712</u></b>	<b><u>22</u></b>	<b><u>46,393</u></b>	<b><u>4,040</u></b>	<b><u>383,649</u></b>	<b><u>447,993</u></b>

**Securities mandatorily measured at fair value through profit or loss as at 31 December 2025**

	Not Rated
Investment fund	32,400
Mortgage bonds	524
<b>Total</b>	<b><u>32,924</u></b>

<sup>1</sup> Moody's ratings

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.9. Financial instruments by rating categories<sup>1</sup>****Securities mandatorily measured at fair value through profit or loss as at 31 December 2024**

	Not Rated
Investment fund	30,878
Shares	1,304
<b>Total</b>	<b><u>32,182</u></b>

**FVOCI securities as at 31 December 2025**

	A1	A3	Ba2	Baa1	Baa2	Baa3	Not Rated	WR	Total
Government bonds	-	17,783	6,523	665	884,200	2,726	-	10,213	922,110
Mortgage bonds	12,456	-	-	-	-	232,153	9,392	-	254,001
Other bonds	-	-	24,403	-	-	-	21,000	-	45,403
Non-trading equity instruments	-	-	-	-	-	-	43,929	-	43,929
<b>Total</b>	<b><u>12,456</u></b>	<b><u>17,783</u></b>	<b><u>30,926</u></b>	<b><u>665</u></b>	<b><u>884,200</u></b>	<b><u>234,879</u></b>	<b><u>74,321</u></b>	<b><u>10,213</u></b>	<b><u>1,265,443</u></b>

**FVOCI securities as at 31 December 2024**

	A1	A3	Ba1	Ba2	Baa1	Baa2	Baa3	Not Rated	WR	Total
Government bonds	-	14,385	-	7,020	5,156	134,199	2,888	-	21,523	185,171
Mortgage bonds	11,751	-	-	-	-	-	306,276	8,923	-	326,950
Other bonds	-	-	4,170	26,605	-	-	-	15,686	-	46,461
Hungarian Treasury Bills	-	-	-	-	-	86	-	-	-	86
Non-trading equity instruments	-	-	-	-	-	-	-	33,934	-	33,934
<b>Total</b>	<b><u>11,751</u></b>	<b><u>14,385</u></b>	<b><u>4,170</u></b>	<b><u>33,625</u></b>	<b><u>5,156</u></b>	<b><u>134,285</u></b>	<b><u>309,164</u></b>	<b><u>58,543</u></b>	<b><u>21,523</u></b>	<b><u>592,602</u></b>

<sup>1</sup> Moody's ratings

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.9. Financial instruments by rating categories<sup>1</sup>****Securities at amortised cost as at 31 December 2025**

	A1	A2	A3	Aa1	Aa3	Ba2	Baa1	Baa2	Baa3	Not Rated	WR	Total
Treasury bills	-	-	-	-	-	-	-	-	-	-	-	-
Government bonds	-	33,323	86,368	246,803	-	19,368	8,816	2,518,671	77,325	-	3,456	2,994,130
Corporate bonds	7,994	390	11,573	-	1,896	-	-	9,107	-	312,899	-	343,859
Mortgage bonds	18,083	-	-	-	-	-	-	-	-	12,015	-	30,098
<b>Total</b>	<b><u>26,077</u></b>	<b><u>33,713</u></b>	<b><u>97,941</u></b>	<b><u>246,803</u></b>	<b><u>1,896</u></b>	<b><u>19,368</u></b>	<b><u>8,816</u></b>	<b><u>2,527,778</u></b>	<b><u>77,325</u></b>	<b><u>324,914</u></b>	<b><u>3,456</u></b>	<b><u>3,368,087</u></b>

**Securities at amortised cost as at 31 December 2024**

	A1	A2	A3	Aaa	Ba2	Baa1	Baa2	Baa3	Not Rated	WR	Total
Treasury bills	-	-	-	-	-	-	-	92,894	-	-	92,894
Government bonds	-	35,427	46,825	295,652	21,021	54,874	2,274,318	130,361	-	10,143	2,868,621
Corporate bonds	1,998	10,090	8,620	-	-	12,285	4,099	9,385	296,249	-	342,726
Mortgage bonds	18,057	-	-	-	-	-	-	-	11,847	-	29,904
<b>Total</b>	<b><u>20,055</u></b>	<b><u>45,517</u></b>	<b><u>55,445</u></b>	<b><u>295,652</u></b>	<b><u>21,021</u></b>	<b><u>67,159</u></b>	<b><u>2,371,311</u></b>	<b><u>139,746</u></b>	<b><u>308,096</u></b>	<b><u>10,143</u></b>	<b><u>3,334,145</u></b>

<sup>1</sup> Moody's ratings

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.1. Credit risk [continued]****36.1.10. Securities (held for trading, mandatorily FVTPL, FVOCI and amortised cost) in a country breakdown**

Country	31 December 2025		31 December 2024	
	Gross carrying amount	Loss allowance	Gross carrying amount	Loss allowance
Hungary	2,845,947	(11,116)	2,447,818	(11,107)
United States of America	265,399	(49)	419,981	(491)
Romania	77,594	(269)	95,062	(293)
Spain	52,296	(27)	57,143	(53)
Poland	39,232	(37)	8,624	(4)
Portugal	36,648	(10)	17,497	(10)
Russia	21,745	(18,289)	27,199	(19,367)
Luxembourg	-	-	281,855	(7,572)
Other	59,115	(92)	17,877	(14)
<b>Securities at amortised cost total</b>	<b><u>3,397,976</u></b>	<b><u>(29,889)</u></b>	<b><u>3,373,056</u></b>	<b><u>(38,911)</u></b>
Hungary	1,169,356	-	460,282	-
Luxembourg	-	-	56,504	-
Other	52,158	=	41,882	=
<b>FVOCI debt instruments total</b>	<b><u>1,221,514</u></b>	<b>=</b>	<b><u>558,668</u></b>	<b>=</b>
United States of America	16,491	-	16,781	-
Austria	17,057	-	16,625	-
Luxembourg	9,853	-	-	-
Other	528	=	528	=
<b>Non-trading equity instruments designated to measure at fair value through other comprehensive income</b>	<b><u>43,929</u></b>	<b>=</b>	<b><u>33,934</u></b>	<b>=</b>
Hungary	128,602	-	420,179	-
Romania	9,696	-	17	-
France	7,527	-	975	-
Montenegro	2,444	-	-	-
Luxembourg	188	-	17,159	-
United States of America	98	-	3,305	-
Other	10,639	=	6,358	=
<b>Held for trading securities total</b>	<b><u>159,194</u></b>	<b>=</b>	<b><u>447,993</u></b>	<b>=</b>
Hungary	27,226	-	24,961	-
Luxembourg	3,949	-	4,629	-
Portugal	1,225	-	1,288	-
United States of America	524	=	1,304	=
<b>Securities mandatorily measured at fair value through profit or loss</b>	<b><u>32,924</u></b>	<b>=</b>	<b><u>32,182</u></b>	<b>=</b>
<b>Securities total</b>	<b><u>4,855,537</u></b>	<b><u>(29,889)</u></b>	<b><u>4,445,833</u></b>	<b><u>(38,911)</u></b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.2. Maturity analysis of assets and liabilities and liquidity risk**

Liquidity risk is a measure of the extent to which the Bank may be required to raise funds to meet its commitments associated with financial instruments. The Bank maintains its liquidity profiles in accordance with regulations laid down by the NBH.

The essential aspect of the liquidity risk management strategy is to identify all relevant systemic and idiosyncratic sources of liquidity risk and to measure the probability and severity of such events. During liquidity risk management the Bank considers the effect of liquidity risk events caused by reasons arising in the bank business line (deposit withdrawal), the national economy (exchange rate shock, yield curve shock) and the global financial system (capital market shock).

In line with the Bank's risk management policy liquidity risks are measured and managed on multiply hierarchy levels and applying integrated unified VaR based methodology. The basic requirement is that the Bank must keep high quality liquidity reserves by means it can fulfil all liabilities when they fall due without material additional costs.

The liquidity reserves can be divided into two parts. There are separate decentralized liquid asset portfolios at subsidiary level and a centralized flexible liquidity pool at Group level. The reserves at subsidiary levels are held to cover the relevant shocks of the subsidiaries which may arise in local currencies (deposit withdrawal, local capital market shock, unexpected business expansion), while the centralized liquidity pool is held to cover the OTP Bank's separate shocks (deposit-, yield curve- and exchange rate shocks) and all group member's potential shocks that may arise in foreign currencies (deposit withdrawal, capital market shock).

The recalculation of shocks is made at least quarterly while the recalibration of shock measurement models and review of the risk management methodology is an annual process. The monitoring of liquidity reserves for both centralized and decentralized liquid asset portfolio has been built into the daily reporting process.

Due to the balance sheet adjustment process (deleveraging) experienced in the last few years, the liquidity reserves of the Bank increased significantly while the liquidity risk exposure has decreased considerably. Currently the (over)coverage of risk liquidity risk exposure by high quality liquid assets is at all-time record highs. There were no material changes in the liquidity risk management process for the year ended 31 December 2025.

The following tables provide an analysis of assets and liabilities about the non-discounted cash flow into relevant maturity groupings based on the remaining period from the balance sheet date to the contractual maturity date. It is presented under the most prudent consideration of maturity dates where options or repayment schedules allow for early repayment possibilities.

The contractual amounts disclosed in the maturity analyses are the contractual undiscounted cash flows like gross finance lease obligations (before deducting finance charges); prices specified in forward agreements to purchase financial assets for cash; net amounts for pay-floating/receive-fixed interest rate swaps for which net cash flows are exchanged; contractual amounts to be exchanged in a derivative financial instrument for which gross cash flows are exchanged; gross loan commitments.

Such undiscounted cash flows differ from the amount included in the statement of financial position because the amount in that statement is based on discounted cash flows. When the amount payable is not fixed, the amount disclosed is determined by reference to the conditions existing at the end of the reporting period. For example, when the amount payable varies with changes in an index, the amount disclosed may be based on the level of the index at the end of the period.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.2. Maturity analysis of assets and liabilities and liquidity risk [continued]**

As at 31 December 2025	Within 3 months	Within one year and over 3 months	Within 5 years and over one year	Over 5 years	Without maturity	Total
Cash, amounts due from banks and balances with the National Bank of Hungary	1,361,889	-	-	-	-	1,361,889
Placements with other banks	306,012	376,321	1,582,994	900,231	-	3,165,558
Repo receivables	322,485	84	-	-	-	322,569
Financial assets at fair value through profit or loss	18,670	30,498	70,751	40,347	21,642	181,908
Securities at fair value through other comprehensive income	20,078	95,545	721,409	504,050	138,792	1,479,874
Securities at amortised cost	97,266	769,387	1,301,283	1,404,510	-	3,572,446
Loans at amortised cost	1,232,253	1,273,241	1,825,066	1,051,376	-	5,381,936
Loans mandatorily measured at fair value through profit or loss	29,964	32,779	179,346	777,031	-	1,019,120
Investment properties	-	-	-	-	4,332	4,332
Investments in subsidiaries, associates and other investments	-	-	-	-	2,639,120	2,639,120
Other financial assets	<u>318,643</u>	<u>7,778</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>326,421</u>
<b>TOTAL ASSETS</b>	<b><u>3,707,260</u></b>	<b><u>2,585,633</u></b>	<b><u>5,680,849</u></b>	<b><u>4,677,545</u></b>	<b><u>2,803,886</u></b>	<b><u>19,455,173</u></b>
Amounts due to banks and deposits from the National Bank of Hungary and other	1,141,609	75,633	380,396	82,760	-	1,680,398
Deposits from customers	11,248,052	114,196	29,479	-	-	11,391,727
Repo liabilities	313,044	16,960	47,528	-	-	377,532
Liabilities from issued securities	62,373	111,007	1,161,804	-	-	1,335,184
Subordinated bonds and loans	10,286	1,882	12,807	466,035	-	491,010
Financial liabilities at fair value through profit or loss	526	1,047	4,877	9,032	-	15,482
Leasing liabilities	2,242	6,694	25,734	27,970	-	62,640
Other financial liabilities	<u>372,068</u>	<u>21,886</u>	<u>7,786</u>	<u>-</u>	<u>-</u>	<u>401,740</u>
<b>TOTAL LIABILITIES</b>	<b><u>13,150,200</u></b>	<b><u>349,305</u></b>	<b><u>1,670,411</u></b>	<b><u>585,797</u></b>	<b><u>-</u></b>	<b><u>15,755,713</u></b>
<b>NET POSITION</b>	<b><u>(9,442,940)</u></b>	<b><u>2,236,328</u></b>	<b><u>4,010,438</u></b>	<b><u>4,091,748</u></b>	<b><u>2,803,886</u></b>	<b><u>3,699,460</u></b>
Receivables from derivative financial instruments classified as held for trading	7,521,214	1,640,544	1,612,694	531,350	-	11,305,802
Liabilities from derivative financial instruments classified as held for trading	<u>(7,504,678)</u>	<u>(1,627,336)</u>	<u>(1,539,479)</u>	<u>(528,322)</u>	<u>-</u>	<u>(11,199,815)</u>
<b>Net position of derivative financial instruments classified as held for trading</b>	<b><u>16,536</u></b>	<b><u>13,208</u></b>	<b><u>73,215</u></b>	<b><u>3,028</u></b>	<b><u>-</u></b>	<b><u>105,987</u></b>
Receivables from derivative financial instruments designated as hedge	50,827	194,393	1,271,627	54,476	-	1,571,323
Liabilities from derivative financial instruments designated as hedge	<u>(49,457)</u>	<u>(196,021)</u>	<u>(1,280,965)</u>	<u>(49,933)</u>	<u>-</u>	<u>(1,576,376)</u>
<b>Net position of derivative financial instruments designated as hedging</b>	<b><u>1,370</u></b>	<b><u>(1,628)</u></b>	<b><u>(9,338)</u></b>	<b><u>4,543</u></b>	<b><u>-</u></b>	<b><u>(5,053)</u></b>
<b>Net position of derivative financial instruments total</b>	<b><u>17,906</u></b>	<b><u>11,580</u></b>	<b><u>63,877</u></b>	<b><u>7,571</u></b>	<b><u>-</u></b>	<b><u>100,934</u></b>
Commitments to extend credit	2,997,804	-	-	-	-	2,997,804
Confirmed letters of credit	17,593	-	-	-	-	17,593
Factoring loan commitment	340,740	-	-	-	-	340,740
Bank guarantees	<u>180,595</u>	<u>257,031</u>	<u>283,310</u>	<u>1,383,445</u>	<u>-</u>	<u>2,104,381</u>
<b>Off-balance sheet commitments</b>	<b><u>3,536,732</u></b>	<b><u>257,031</u></b>	<b><u>283,310</u></b>	<b><u>1,383,445</u></b>	<b><u>-</u></b>	<b><u>5,460,518</u></b>

Analysis for net position of assets and liabilities are calculated in accordance with IFRS 7, therefore certain financial instruments are presented in the earliest period in which the Bank could be required to pay. On-demand deposits are presented in the earliest (within 3 month) period category, however based on Management's discretion the Bank has appropriate liquidity reserves as maintenance and management of liquidity risk.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.2. Maturity analysis of assets and liabilities and liquidity risk [continued]**

As at 31 December 2024	Within 3 months	Within one year and over 3 months	Within 5 years and over one year	Over 5 years	Without maturity	Total
Cash, amounts due from banks and balances with the National Bank of Hungary	2,077,292	-	-	-	-	2,077,292
Placements with other banks	332,486	221,323	1,634,750	765,327	-	2,953,886
Repo receivables	238,433	-	-	-	-	238,433
Financial assets at fair value through profit or loss	385,377	2,569	40,290	21,158	20,242	469,636
Securities at fair value through other comprehensive income	5,868	93,245	454,446	74,995	136,399	764,953
Securities at amortised cost	59,149	493,039	1,644,569	1,307,052	-	3,503,809
Loans at amortised cost	1,183,589	1,262,281	1,571,525	915,146	-	4,932,541
Loans mandatorily measured at fair value through profit or loss	21,066	24,296	146,723	734,780	-	926,865
Investment properties	-	-	-	-	4,227	4,227
Investments in subsidiaries, associates and other investments	-	-	-	-	2,593,722	2,593,722
Other financial assets	291,864	1,235	-	-	-	293,099
<b>TOTAL ASSETS</b>	<b>4,595,124</b>	<b>2,097,988</b>	<b>5,492,303</b>	<b>3,818,458</b>	<b>2,754,590</b>	<b>18,758,463</b>
Amounts due to banks and deposits from the National Bank of Hungary and other	585,712	435,876	525,485	87,541	-	1,634,614
Deposits from customers	10,761,785	106,036	20,732	3,371	-	10,891,924
Repo liabilities	132,122	59,692	35,818	-	-	227,632
Liabilities from issued securities	65,947	64,267	1,401,099	204,680	-	1,735,993
Subordinated bonds and loans	3,856	1,912	10,586	354,468	-	370,822
Financial liabilities at fair value through profit or loss	650	1,059	5,130	10,160	-	16,999
Leasing liabilities	2,114	6,932	25,351	29,983	-	64,380
Other financial liabilities	331,151	22,240	3,705	-	-	357,096
<b>TOTAL LIABILITIES</b>	<b>11,883,337</b>	<b>698,014</b>	<b>2,027,906</b>	<b>690,203</b>	<b>-</b>	<b>15,299,460</b>
<b>NET POSITION</b>	<b>(7,288,213)</b>	<b>1,399,974</b>	<b>3,464,397</b>	<b>3,128,255</b>	<b>2,754,590</b>	<b>3,459,003</b>
Receivables from derivative financial instruments classified as held for trading	6,463,067	1,621,571	823,267	287,608	-	9,195,513
Liabilities from derivative financial instruments classified as held for trading	(6,433,805)	(1,627,283)	(806,626)	(286,507)	-	(9,154,221)
<b>Net position of derivative financial instruments classified as held for trading</b>	<b>29,262</b>	<b>(5,712)</b>	<b>16,641</b>	<b>1,101</b>	<b>=</b>	<b>41,292</b>
Receivables from derivative financial instruments designated as hedge	38,609	236,429	855,933	15,508	-	1,146,479
Liabilities from derivative financial instruments designated as hedge	(30,267)	(240,753)	(813,727)	(9,922)	-	(1,094,669)
<b>Net position of derivative financial instruments designated as hedging</b>	<b>8,342</b>	<b>(4,324)</b>	<b>42,206</b>	<b>5,586</b>	<b>=</b>	<b>51,810</b>
<b>Net position of derivative financial instruments total</b>	<b>37,604</b>	<b>(10,036)</b>	<b>58,847</b>	<b>6,687</b>	<b>=</b>	<b>93,102</b>
Commitments to extend credit	2,536,990	-	-	-	-	2,536,990
Confirmed letters of credit	5,181	-	-	-	-	5,181
Factoring loan commitment	382,011	-	-	-	-	382,011
Bank guarantees	122,813	253,973	502,016	1,024,916	-	1,903,718
<b>Off-balance sheet commitments</b>	<b>3,046,995</b>	<b>253,973</b>	<b>502,016</b>	<b>1,024,916</b>	<b>=</b>	<b>4,827,900</b>

Analysis for net position of assets and liabilities are calculated in accordance with IFRS 7, therefore certain financial instruments are presented in the earliest period in which the Bank could be required to pay. On-demand deposits are presented in the earliest (within 3 month) period category, however based on Management's discretion the Bank has appropriate liquidity reserves as maintenance and management of liquidity risk.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.3. Net foreign currency position and foreign currency risk****31 December 2025**

	<b>USD</b>	<b>EUR</b>	<b>CHF</b>	<b>Others</b>	<b>Total</b>
Assets	548,032	3,925,701	6,276	136,602	4,616,611
Liabilities	(1,155,531)	(4,041,378)	(60,229)	(136,028)	(5,393,166)
Derivative financial instruments	<u>607,753</u>	<u>(283,700)</u>	<u>53,974</u>	<u>4,884</u>	<u>382,911</u>
<b>Net position</b>	<b><u>254</u></b>	<b><u>(399,377)</u></b>	<b><u>21</u></b>	<b><u>5,458</u></b>	<b><u>(393,644)</u></b>

**31 December 2024**

	<b>USD</b>	<b>EUR</b>	<b>CHF</b>	<b>Others</b>	<b>Total</b>
Assets	615,111	3,860,200	9,286	154,291	4,638,888
Liabilities	(926,271)	(4,157,697)	(56,168)	(107,943)	(5,248,079)
Derivative financial instruments	<u>299,572</u>	<u>(144,966)</u>	<u>45,953</u>	<u>(20,521)</u>	<u>180,038</u>
<b>Net position</b>	<b><u>(11,588)</u></b>	<b><u>(442,463)</u></b>	<b><u>(929)</u></b>	<b><u>25,827</u></b>	<b><u>(429,153)</u></b>

The table above provides an analysis of the Bank's main foreign currency exposures. The remaining foreign currencies are shown within 'Others'. The Bank monitors its foreign exchange position for compliance with the regulatory requirements of the NBH and its own limit system established in respect of limits on open positions. The measurement of the Bank's open its currency position involves monitoring the VaR limit on the foreign exchange exposure of the Bank.

In the table Derivative financial instruments are stated at fair value.

**36.4. Interest rate risk management**

Interest rate risk is the risk that the value of a financial instrument will fluctuate due to changes in market interest rates. The length of time for which the rate of interest is fixed on a financial instrument, therefore, indicates to what extent it is exposed to interest rate risk.

The majority of the Bank's interest bearing assets and liabilities are structured to match either short-term assets and short-term liabilities, or long-term assets and liabilities with repricing opportunities within one year, or long-term assets and corresponding liabilities where repricing is performed simultaneously.

In addition, the significant spread existing between the different types of interest bearing assets and liabilities enables the Bank to benefit from a high level of flexibility in adjusting for its interest rate matching and interest rate risk exposure.

The following table presents the interest repricing dates of the Bank. Variable yield assets and liabilities have been reported in accordance with their next repricing date. Fixed income assets and liabilities have been reported in accordance with their maturity.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.4. Interest rate risk management [continued]**

As at 31 December 2025	within 1 month		within 3 months over 1 month		within 1 year over 3 months		within 2 years over 1 year		over 2 years		Non-interest -bearing		Total		Total
	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	
<b>ASSETS</b>															
<b>Cash, amounts due from banks and balances with the National Bank of Hungary</b>	<b>5,873</b>	<b>175,524</b>	-	-	-	-	-	-	-	-	<b>1,164,311</b>	<b>14,052</b>	<b>1,170,184</b>	<b>189,576</b>	<b>1,359,760</b>
fixed interest	243	175,524	-	-	-	-	-	-	-	-	-	-	243	175,524	175,767
variable interest	5,630	-	-	-	-	-	-	-	-	-	-	-	5,630	-	5,630
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	1,164,311	14,052	1,164,311	14,052	1,178,363
<b>Placements with other banks</b>	<b>54,618</b>	<b>97,171</b>	<b>234,674</b>	<b>658,992</b>	<b>184,261</b>	<b>254,508</b>	<b>440,917</b>	<b>8,094</b>	<b>1,051,423</b>	<b>114,100</b>	<b>60,497</b>	<b>2,289</b>	<b>2,026,390</b>	<b>1,135,154</b>	<b>3,161,544</b>
fixed interest	6,517	821	-	83,204	170,149	88,723	440,917	8,094	1,051,423	114,100	-	-	1,669,006	294,942	1,963,948
variable interest	48,101	96,350	234,674	575,788	14,112	165,785	-	-	-	-	-	-	296,887	837,923	1,134,810
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	60,497	2,289	60,497	2,289	62,786
<b>Repo receivables</b>	<b>150,543</b>	<b>13,330</b>	<b>158,411</b>	-	-	<b>84</b>	-	-	-	-	-	-	<b>308,954</b>	<b>13,414</b>	<b>322,368</b>
fixed interest	150,543	13,330	158,411	-	-	84	-	-	-	-	-	-	308,954	13,414	322,368
<b>Securities held for trading</b>	<b>7,231</b>	<b>6,679</b>	<b>14,260</b>	<b>884</b>	<b>32,551</b>	<b>4,989</b>	<b>894</b>	<b>8,606</b>	<b>60,986</b>	<b>19,648</b>	<b>560</b>	<b>1,906</b>	<b>116,482</b>	<b>42,712</b>	<b>159,194</b>
fixed interest	4,103	6,679	143	884	18,907	4,989	894	8,606	60,986	19,648	-	-	85,033	40,806	125,839
variable interest	3,128	-	14,117	-	13,644	-	-	-	-	-	-	-	30,889	-	30,889
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	560	1,906	560	1,906	2,466
<b>Securities mandatorily measured at fair value through profit or loss</b>	-	-	-	-	-	-	-	-	-	-	<b>27,225</b>	<b>5,699</b>	<b>27,225</b>	<b>5,699</b>	<b>32,924</b>
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	27,225	5,699	27,225	5,699	32,924
<b>Securities at fair value through other comprehensive income</b>	<b>313,401</b>	-	<b>2,169</b>	<b>4,110</b>	<b>82,381</b>	<b>2,467</b>	<b>31,482</b>	<b>35,728</b>	<b>715,355</b>	<b>34,421</b>	<b>528</b>	<b>43,401</b>	<b>1,145,316</b>	<b>120,127</b>	<b>1,265,443</b>
fixed interest	-	-	-	3,946	82,381	2,467	31,482	35,728	715,355	34,421	-	-	829,218	76,562	905,780
variable interest	313,401	-	2,169	164	-	-	-	-	-	-	-	-	315,570	164	315,734
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	528	43,401	528	43,401	43,929

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.4. Interest rate risk management [continued]**

As at 31 December 2025	within 1 month		within 3 months over 1 month		within 1 year over 3 months		within 2 years over 1 year		over 2 years		Non-interest -bearing		Total		Total
	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	
<b>ASSETS [continued]</b>															
<b>Loans measured at amortised cost</b>	<b>1,021,883</b>	<b>848,418</b>	<b>407,245</b>	<b>1,036,666</b>	<b>96,241</b>	<b>214,253</b>	<b>113,316</b>	<b>11,152</b>	<b>1,052,571</b>	<b>137,308</b>	<b>147,658</b>	<b>48,612</b>	<b>2,838,914</b>	<b>2,296,409</b>	<b>5,135,323</b>
fixed interest	23,013	1,846	12,385	1,508	76,646	36,376	112,790	11,152	1,048,743	137,308	-	-	1,273,577	188,190	1,461,767
variable interest	998,870	846,572	394,860	1,035,158	19,595	177,877	526	-	3,828	-	-	-	1,417,679	2,059,607	3,477,286
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	147,658	48,612	147,658	48,612	196,270
<b>Loans mandatorily measured at fair value through profit or loss</b>	<b>43,491</b>	<b>-</b>	<b>58,845</b>	<b>-</b>	<b>285,820</b>	<b>-</b>	<b>158,750</b>	<b>-</b>	<b>535,782</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,082,688</b>	<b>-</b>	<b>1,082,688</b>
variable interest	43,491	-	58,845	-	285,820	-	158,750	-	535,782	-	-	-	1,082,688	-	1,082,688
<b>Securities at amortised cost</b>	<b>10,074</b>	<b>47,843</b>	<b>40,276</b>	<b>6,867</b>	<b>678,084</b>	<b>98,228</b>	<b>183,274</b>	<b>54,176</b>	<b>1,709,174</b>	<b>540,091</b>	<b>-</b>	<b>-</b>	<b>2,620,882</b>	<b>747,205</b>	<b>3,368,087</b>
fixed interest	-	47,843	-	3,394	678,084	98,228	183,274	54,176	1,709,174	540,091	-	-	2,570,532	743,732	3,314,264
variable interest	10,074	-	40,276	3,473	-	-	-	-	-	-	-	-	50,350	3,473	53,823
<b>Other financial assets</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>245,419</b>	<b>59,542</b>	<b>245,419</b>	<b>59,542</b>	<b>304,961</b>
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	245,419	59,542	245,419	59,542	304,961
<b>Derivative financial instruments</b>	<b>1,760,030</b>	<b>273,949</b>	<b>897,520</b>	<b>1,874,104</b>	<b>638,936</b>	<b>790,966</b>	<b>26,139</b>	<b>117,822</b>	<b>728,749</b>	<b>377,601</b>	<b>298,573</b>	<b>844,841</b>	<b>4,349,947</b>	<b>4,279,283</b>	<b>8,629,230</b>
fixed interest	1,698,841	187,359	367,301	878,640	297,814	487,317	26,139	114,589	728,749	377,601	-	-	3,118,844	2,045,506	5,164,350
variable interest	61,189	86,590	530,219	995,464	341,122	303,649	-	3,233	-	-	-	-	932,530	1,388,936	2,321,466
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	298,573	844,841	298,573	844,841	1,143,414

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.4. Interest rate risk management [continued]**

As at 31 December 2025	within 1 month		within 3 months over 1 month		within 1 year over 3 months		within 2 years over 1 year		over 2 years		Non-interest -bearing		Total		Total
	HUF	foreign currency	HUF	foreign currency	HUF	foreign curren- cy	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	
<b>LIABILITIES</b>															
<b>Amounts due to banks and deposits with the National Bank of Hungary and other banks</b>	<b>140,296</b>	<b>572,091</b>	<b>215,270</b>	<b>303,168</b>	<b>56,793</b>	<b>228</b>	<b>25,735</b>	<b>90,619</b>	<b>145,220</b>	<b>81,889</b>	<b>22,065</b>	<b>2,993</b>	<b>605,379</b>	<b>1,050,988</b>	<b>1,656,367</b>
fixed interest	87,911	322,472	215,270	187,241	56,793	228	25,735	90,619	145,220	81,889	-	-	530,929	682,449	1,213,378
variable interest	52,385	249,619	-	115,927	-	-	-	-	-	-	-	-	52,385	365,546	417,931
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	22,065	2,993	22,065	2,993	25,058
<b>Financial liabilities designated to measure at fair value through profit or loss</b>	<b>15,271</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>8</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>15,279</b>	<b>-</b>	<b>15,279</b>
fixed interest	-	-	-	-	8	-	-	-	-	-	-	-	8	-	8
variable interest	15,271	-	-	-	-	-	-	-	-	-	-	-	15,271	-	15,271
<b>Repo liabilities</b>	<b>165,748</b>	<b>134,540</b>	<b>31,112</b>	<b>-</b>	<b>-</b>	<b>16,802</b>	<b>-</b>	<b>2,947</b>	<b>-</b>	<b>26,383</b>	<b>-</b>	<b>-</b>	<b>196,860</b>	<b>180,672</b>	<b>377,532</b>
fixed interest	165,748	116,185	31,112	-	-	16,802	-	2,947	-	26,383	-	-	196,860	162,317	359,177
variable interest	-	18,355	-	-	-	-	-	-	-	-	-	-	-	18,355	18,355
<b>Deposits from customers</b>	<b>8,410,014</b>	<b>2,260,890</b>	<b>522,543</b>	<b>32,209</b>	<b>65,860</b>	<b>28,554</b>	<b>292</b>	<b>-</b>	<b>11,390</b>	<b>-</b>	<b>23,287</b>	<b>37,159</b>	<b>9,033,386</b>	<b>2,358,812</b>	<b>11,392,198</b>
fixed interest	1,224,402	377,012	129,730	32,209	65,860	28,554	292	-	11,390	-	-	-	1,431,674	437,775	1,869,449
variable interest	7,185,612	1,883,878	392,813	-	-	-	-	-	-	-	-	-	7,578,425	1,883,878	9,462,303
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	23,287	37,159	23,287	37,159	60,446
<b>Liabilities from issued securities</b>	<b>15,801</b>	<b>-</b>	<b>17,569</b>	<b>-</b>	<b>114,003</b>	<b>-</b>	<b>-</b>	<b>435,707</b>	<b>156</b>	<b>758,014</b>	<b>-</b>	<b>-</b>	<b>147,529</b>	<b>1,193,721</b>	<b>1,341,250</b>
fixed interest	15,801	-	17,569	-	114,003	-	-	435,707	156	758,014	-	-	147,529	1,193,721	1,341,250
<b>Subordinated bonds and loans</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,852</b>	<b>-</b>	<b>1,860</b>	<b>-</b>	<b>14,106</b>	<b>475,768</b>	<b>-</b>	<b>-</b>	<b>17,818</b>	<b>475,768</b>	<b>493,586</b>
fixed interest	-	-	-	-	1,852	-	1,860	-	14,106	475,768	-	-	17,818	475,768	493,586
<b>Leasing liabilities</b>	<b>-</b>	<b>-</b>	<b>103</b>	<b>4</b>	<b>129</b>	<b>439</b>	<b>1,599</b>	<b>4,717</b>	<b>22,916</b>	<b>32,735</b>	<b>-</b>	<b>-</b>	<b>24,747</b>	<b>37,894</b>	<b>62,641</b>
fixed interest	-	-	-	-	53	8	26	272	22,330	3,297	-	-	22,409	3,576	25,985
variable interest	-	-	103	4	76	431	1,573	4,445	586	29,438	-	-	2,338	34,318	36,656
<b>Other financial liabilities</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>231,954</b>	<b>189,450</b>	<b>231,954</b>	<b>189,450</b>	<b>421,404</b>
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	231,954	189,450	231,954	189,450	421,404
<b>Derivative financial instruments</b>	<b>1,828,815</b>	<b>195,439</b>	<b>1,362,550</b>	<b>1,350,669</b>	<b>472,317</b>	<b>929,219</b>	<b>34,257</b>	<b>47,007</b>	<b>534,141</b>	<b>651,182</b>	<b>416,585</b>	<b>721,991</b>	<b>4,648,665</b>	<b>3,895,507</b>	<b>8,544,172</b>
fixed interest	1,794,940	83,090	664,548	580,804	301,034	470,648	34,257	46,428	533,201	651,182	-	-	3,327,980	1,832,152	5,160,132
variable interest	33,875	112,349	698,002	769,865	171,283	458,571	-	579	940	-	-	-	904,100	1,341,364	2,245,464
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	416,585	721,991	416,585	721,991	1,138,576
<b>NET POSITION</b>	<b>(7,208,801)</b>	<b>(1,700,046)</b>	<b>(335,747)</b>	<b>1,895,573</b>	<b>1,287,312</b>	<b>390,253</b>	<b>891,029</b>	<b>(345,419)</b>	<b>5,126,111</b>	<b>(802,802)</b>	<b>1,250,880</b>	<b>68,749</b>	<b>1,010,784</b>	<b>(493,691)</b>	<b>517,093</b>

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.4. Interest rate risk management [continued]**

As at 31 December 2024	within 1 month		within 3 months over 1 month		within 1 year over 3 months		within 2 years over 1 year		over 2 years		Non-interest -bearing		Total		Total	
	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency		
<b>ASSETS</b>																
<b>Cash, amounts due from banks and balances with the National Bank of Hungary</b>	<b>1,407,734</b>	<b>416,395</b>	-	-	-	-	-	-	-	-	<b>230,897</b>	<b>20,153</b>	<b>1,638,631</b>	<b>436,548</b>	<b>2,075,179</b>	
fixed interest	1,405,635	416,395	-	-	-	-	-	-	-	-	-	-	1,405,635	416,395	<b>1,822,030</b>	
variable interest	2,099	-	-	-	-	-	-	-	-	-	-	-	2,099	-	<b>2,099</b>	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	230,897	20,153	230,897	<b>251,050</b>	
<b>Placements with other banks</b>	<b>89,742</b>	<b>104,551</b>	<b>158,341</b>	<b>609,588</b>	<b>169,387</b>	<b>198,935</b>	<b>245,624</b>	<b>9,029</b>	<b>1,225,033</b>	<b>80,234</b>	<b>55,054</b>	<b>3,018</b>	<b>1,943,181</b>	<b>1,005,355</b>	<b>2,948,536</b>	
fixed interest	200	36,666	38,098	24,981	155,282	22,569	245,624	9,029	1,225,033	80,234	-	-	1,664,237	173,479	<b>1,837,716</b>	
variable interest	89,542	67,885	120,243	584,607	14,105	176,366	-	-	-	-	-	-	223,890	828,858	<b>1,052,748</b>	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	55,054	3,018	55,054	3,018	<b>58,072</b>	
<b>Repo receivables</b>	<b>234,308</b>	<b>3,771</b>	-	-	-	-	-	-	-	-	-	-	-	<b>234,308</b>	<b>3,771</b>	<b>238,079</b>
fixed interest	234,308	3,771	-	-	-	-	-	-	-	-	-	-	-	234,308	3,771	<b>238,079</b>
<b>Securities held for trading</b>	<b>380,609</b>	<b>3,456</b>	<b>1,149</b>	<b>1,009</b>	<b>1,618</b>	<b>2,089</b>	<b>525</b>	<b>7,158</b>	<b>35,045</b>	<b>13,761</b>	<b>451</b>	<b>1,123</b>	<b>419,397</b>	<b>28,596</b>	<b>447,993</b>	
fixed interest	378,916	3,456	214	1,009	491	2,089	525	7,158	35,045	13,761	-	-	415,191	27,473	<b>442,664</b>	
variable interest	1,693	-	935	-	1,127	-	-	-	-	-	-	-	3,755	-	<b>3,755</b>	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	451	1,123	451	1,123	<b>1,574</b>	
<b>Securities mandatorily measured at fair value through profit or loss</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>24,961</b>	<b>7,221</b>	<b>24,961</b>	<b>7,221</b>	<b>32,182</b>	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	24,961	7,221	24,961	7,221	<b>32,182</b>	
<b>Securities at fair value through other comprehensive income</b>	<b>122,439</b>	<b>-</b>	<b>281</b>	<b>-</b>	<b>76,093</b>	<b>15,376</b>	<b>79,629</b>	<b>8,298</b>	<b>181,840</b>	<b>74,712</b>	<b>528</b>	<b>33,406</b>	<b>460,810</b>	<b>131,792</b>	<b>592,602</b>	
fixed interest	15	-	36	-	76,093	15,376	79,629	8,298	181,840	74,712	-	-	337,613	98,386	<b>435,999</b>	
variable interest	122,424	-	245	-	-	-	-	-	-	-	-	-	122,669	-	<b>122,669</b>	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	528	33,406	528	33,406	<b>33,934</b>	

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.4. Interest rate risk management [continued]**

As at 31 December 2024	within 1 month		within 3 months over 1 month		within 1 year over 3 months		within 2 years over 1 year		over 2 years		Non-interest -bearing		Total		Total
	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	
<b>ASSETS [continued]</b>															
<b>Loans measured at amortised cost</b>	<b>878,480</b>	<b>380,102</b>	<b>418,368</b>	<b>1,323,434</b>	<b>86,376</b>	<b>144,892</b>	<b>129,410</b>	<b>49,920</b>	<b>965,842</b>	<b>114,664</b>	<b>131,572</b>	<b>47,735</b>	<b>2,610,048</b>	<b>2,060,747</b>	<b>4,670,795</b>
fixed interest	32,282	4,609	56,265	15,038	65,824	12,080	128,772	49,920	960,350	114,664	-	-	1,243,493	196,311	1,439,804
variable interest	846,198	375,493	362,103	1,308,396	20,552	132,812	638	-	5,492	-	-	-	1,234,983	1,816,701	3,051,684
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	131,572	47,735	131,572	47,735
<b>Loans mandatorily measured at fair value through profit or loss</b>	<b>38,722</b>	<b>-</b>	<b>56,500</b>	<b>-</b>	<b>240,663</b>	<b>-</b>	<b>206,321</b>	<b>-</b>	<b>456,204</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>998,410</b>	<b>-</b>	<b>998,410</b>
variable interest	38,722	-	56,500	-	240,663	-	206,321	-	456,204	-	-	-	998,410	-	998,410
<b>Securities at amortised cost</b>	<b>10,044</b>	<b>-</b>	<b>10,042</b>	<b>24,453</b>	<b>447,692</b>	<b>42,579</b>	<b>716,262</b>	<b>173,664</b>	<b>1,233,518</b>	<b>675,891</b>	<b>-</b>	<b>-</b>	<b>2,417,558</b>	<b>916,587</b>	<b>3,334,145</b>
fixed interest	-	-	-	20,330	447,692	42,579	716,262	173,664	1,233,518	675,891	-	-	2,397,472	912,464	3,309,936
variable interest	10,044	-	10,042	4,123	-	-	-	-	-	-	-	-	20,086	4,123	24,209
<b>Other financial assets</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>236,098</b>	<b>45,477</b>	<b>236,098</b>	<b>45,477</b>	<b>281,575</b>
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	236,098	45,477	236,098	45,477	281,575
<b>Derivative financial instruments</b>	<b>1,085,665</b>	<b>1,135,028</b>	<b>1,081,525</b>	<b>1,050,642</b>	<b>997,364</b>	<b>609,274</b>	<b>188,848</b>	<b>32,356</b>	<b>330,884</b>	<b>309,251</b>	<b>947,223</b>	<b>209,523</b>	<b>4,631,509</b>	<b>3,346,074</b>	<b>7,977,583</b>
fixed interest	1,024,077	1,072,109	854,189	542,593	650,215	443,101	188,848	32,356	328,417	309,251	-	-	3,045,746	2,399,410	5,445,156
variable interest	61,588	62,919	227,336	508,049	347,149	166,173	-	-	2,467	-	-	-	638,540	737,141	1,375,681
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	947,223	209,523	947,223	209,523

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.4. Interest rate risk management [continued]**

As at 31 December 2024	within 1 month		within 3 months over 1 month		within 1 year over 3 months		within 2 years over 1 year		over 2 years		Non-interest -bearing		Total		Total	
	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency	HUF	foreign currency		
<b>LIABILITIES</b>																
<b>Amounts due to banks and deposits with the National Bank of Hungary and other banks</b>	<b>196,884</b>	<b>262,803</b>	<b>60,667</b>	<b>66,242</b>	<b>165,524</b>	<b>229,647</b>	<b>62,030</b>	<b>115,666</b>	<b>361,509</b>	<b>53,701</b>	<b>30,012</b>	<b>2,284</b>	<b>876,626</b>	<b>730,343</b>	<b>1,606,969</b>	
fixed interest	153,679	38,185	60,667	15,023	165,524	229,647	62,030	115,666	361,509	53,701	-	-	803,409	452,222	1,255,631	
variable interest	43,205	224,618	-	51,219	-	-	-	-	-	-	-	-	43,205	275,837	319,042	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	30,012	2,284	30,012	2,284	32,296	
<b>Financial liabilities designated to measure at fair value through profit or loss</b>	<b>17,008</b>	-	-	-	-	-	<b>16</b>	-	-	-	-	-	<b>17,024</b>	-	<b>17,024</b>	
fixed interest	-	-	-	-	-	-	16	-	-	-	-	-	16	-	16	
variable interest	17,008	-	-	-	-	-	-	-	-	-	-	-	17,008	-	17,008	
<b>Repo liabilities</b>	<b>23,721</b>	<b>108,402</b>	-	-	<b>38,102</b>	<b>21,446</b>	-	<b>20,135</b>	-	<b>15,825</b>	-	-	<b>61,823</b>	<b>165,808</b>	<b>227,631</b>	
fixed interest	23,721	108,402	-	-	38,102	21,446	-	20,135	-	15,825	-	-	61,823	165,808	227,631	
<b>Deposits from customers</b>	<b>8,382,934</b>	<b>2,168,862</b>	<b>138,060</b>	<b>45,305</b>	<b>59,802</b>	<b>32,275</b>	<b>2</b>	-	<b>275</b>	-	<b>51,129</b>	<b>17,583</b>	<b>8,632,202</b>	<b>2,264,025</b>	<b>10,896,227</b>	
fixed interest	1,085,763	276,631	138,060	45,305	59,802	32,275	2	-	275	-	-	-	1,283,902	354,211	1,638,113	
variable interest	7,297,171	1,892,231	-	-	-	-	-	-	-	-	-	-	7,297,171	1,892,231	9,189,402	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	51,129	17,583	51,129	17,583	68,712	
<b>Liabilities from issued securities</b>	<b>2,262</b>	-	<b>14,410</b>	-	<b>65,794</b>	<b>14,279</b>	<b>13,297</b>	<b>385,166</b>	<b>156</b>	<b>1,255,529</b>	-	-	<b>95,919</b>	<b>1,654,974</b>	<b>1,750,893</b>	
fixed interest	2,262	-	14,410	-	65,794	14,279	13,297	385,166	156	1,255,529	-	-	95,919	1,640,695	1,736,614	
variable interest	-	-	-	-	-	14,279	-	-	-	-	-	-	-	14,279	14,279	
<b>Subordinated bonds and loans</b>	-	-	-	<b>94,613</b>	<b>1,898</b>	-	<b>1,786</b>	-	<b>11,470</b>	<b>252,504</b>	-	-	<b>15,154</b>	<b>347,117</b>	<b>362,271</b>	
fixed interest	-	-	-	-	1,898	-	1,786	-	11,470	252,504	-	-	15,154	252,504	267,658	
variable interest	-	-	-	94,613	-	-	-	-	-	-	-	-	-	94,613	94,613	
<b>Leasing liabilities</b>	<b>328</b>	<b>462</b>	<b>655</b>	<b>926</b>	<b>2,624</b>	<b>4,051</b>	<b>4,921</b>	<b>5,219</b>	<b>17,597</b>	<b>27,597</b>	-	-	<b>26,125</b>	<b>38,255</b>	<b>64,380</b>	
fixed interest	198	71	395	144	1,732	695	3,783	1,721	11,361	5,355	-	-	17,469	7,986	25,455	
variable interest	130	391	260	782	892	3,356	1,138	3,498	6,236	22,242	-	-	8,656	30,269	38,925	
<b>Other financial liabilities</b>	-	-	-	-	-	-	-	-	-	-	<b>162,741</b>	<b>174,875</b>	<b>162,741</b>	<b>174,875</b>	<b>337,616</b>	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	162,741	174,875	162,741	174,875	337,616	
<b>Derivative financial instruments</b>	<b>724,563</b>	<b>1,541,554</b>	<b>1,474,763</b>	<b>635,972</b>	<b>1,239,772</b>	<b>520,771</b>	<b>149,761</b>	<b>42,129</b>	<b>234,831</b>	<b>213,649</b>	<b>573,389</b>	<b>576,175</b>	<b>4,397,079</b>	<b>3,530,250</b>	<b>7,927,329</b>	
fixed interest	601,606	1,497,513	878,673	490,054	771,817	329,905	149,585	42,129	234,831	213,649	-	-	2,636,512	2,573,250	5,209,762	
variable interest	122,957	44,041	596,090	145,918	467,955	190,866	176	-	-	-	-	-	1,187,178	380,825	1,568,003	
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	573,389	576,175	573,389	576,175	1,149,564	
<b>NET POSITION</b>	<b>(5,099,957)</b>	<b>(2,038,780)</b>	<b>37,651</b>	<b>2,166,068</b>	<b>445,677</b>	<b>190,676</b>	<b>1,334,806</b>	<b>(287,890)</b>	<b>3,802,528</b>	<b>(550,292)</b>	<b>809,513</b>	<b>(403,261)</b>	<b>1,330,218</b>	<b>(923,479)</b>	<b>406,739</b>	

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.5. Market risk**

The Bank takes on exposure to market risks. Market risks arise from open positions in interest rate, currency and equity products, all of which are exposed to general and specific market movements. The Bank applies a Value-at-Risk ("VaR") methodology to estimate the market risk of positions held and the maximum losses expected, based upon a number of assumptions for various changes in market conditions. The Management Board sets limits on the value of risk that may be accepted, which is monitored on a daily basis. (Analysis of liquidity risk, foreign currency risk and interest rate risk is detailed in Notes 36.2, 36.3 and 36.4 respectively.)

**36.5.1. Market risk sensitivity analysis**

The VaR risk measure estimates the potential loss in pre-tax profit over a given holding period for a specified confidence level. The VaR methodology is a statistically defined, probability-based approach that takes into account market volatilities as well as risk diversification by recognizing offsetting positions and correlations between products and markets. Risks can be measured consistently across all markets and products, and risk measures can be aggregated to arrive at a single risk number. The one-day 99% VaR number used by the Group reflects the 99% probability that the daily loss will not exceed the reported VaR.

VaR methodologies are employed to calculate daily risk numbers include the historical and variance-covariance approach. The diversification effect has not been validated among the various market risk types when capital calculation happens. In addition to these two methodologies, Monte Carlo simulations are applied to the various portfolios on a monthly basis to determine potential future exposure.

The VaR of the trading portfolio can be summarized as follows (in HUF mn):

Historical VaR (99%, one-day) by risk type	Average	
	2025	2024
Foreign exchange	1,722	7,650
Interest rate	150	298
Equity instruments	20	11
Diversification	-	-
<b>Total VaR exposure</b>	<b><u>1,892</u></b>	<b><u>7,960</u></b>

The table above shows the VaR figures by asset classes. Since processes driving the value of the major asset classes are not independent (for example the depreciation of HUF against the EUR mostly coincide with the increase of the yields of Hungarian Government Bonds), a diversification impact emerges, so the overall VaR is less than the sum of the VaR of each individual asset class.

While VaR captures the OTP's daily exposure to currency and interest rate risk, sensitivity analysis evaluates the impact of a reasonably possible change in interest or foreign currency rates over a year. The longer time frame of sensitivity analysis complements VaR and helps the OTP to assess its market risk exposures. Details of sensitivity analysis for foreign currency risk are set out in Note 36.5.2., for interest rate risk in Note 36.5.3., and for equity price sensitivity analysis in Note 36.5.4.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.5. Market risk [continued]****36.5.2. Foreign currency sensitivity analysis**

The following table shows the result of the foreign currency sensitivity analysis. The Group uses VaR calculation with 1 day holding period and a 99% confidence level. The VaR methodology is a statistically defined, probability-based approach that takes into account market volatilities as well as risk diversification by recognizing offsetting positions and correlations between products and markets. The daily loss will not exceed the reported VaR number with 99% of probability.

Probability	Effects to the P&L in 3 months period	
	2025	2024
	In HUF million	In HUF million
1%	(532)	(3,981)
5%	(374)	(2,442)
25%	(97)	(977)
50%	18	(93)
25%	145	850
5%	315	2,211
1%	418	2,920

Notes:

- (1) (1) Historical VaR simulation is based on the empirical distribution of the historical exchange rate movements between 31 December 2024 and 31 December 2025.

**36.5.3. Interest rate sensitivity analysis**

The sensitivity analyses below have been determined based on the exposure to interest rates for both derivatives and non-derivative instruments at the balance sheet date. The analysis is prepared assuming the amount of assets and liabilities outstanding at the balance sheet date was outstanding for the whole year. The analysis was prepared by assuming only adverse interest rate changes. The main assumptions were as follows:

- Floating rate assets and liabilities were repriced to the modelled benchmark yields at the repricing dates assuming the unchanged margin compared to the last repricing.
- Fixed rate assets and liabilities were repriced at the contractual maturity date.
- As for liabilities with discretionary repricing feature by the Bank were assumed to be repriced with two-weeks delay, assuming no change in the margin compared to the last repricing date.
- Deposits with an interest rate lower than 0.3% even at high market rates were assumed to be unchanged for the whole period.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.5. Market risk [continued]****36.5.3. Interest rate sensitivity analysis [continued]**

The sensitivity of interest income to changes in BUBOR was analysed by assuming two interest rate path scenarios:

- (1) (1) HUF base rate and BUBOR increases gradually by 35 bps over the next year (probable scenario)
- (2) (2) HUF base rate and BUBOR increases gradually by 100 bps over the next year (alternative scenario)

The net interest income in a one year period after 1 January 2025 would change by HUF -467 million (probable scenario) and HUF +1,321 million (alternative scenario) as a result of these simulation. Besides this effect there would be capital gains/losses of HUF +26 million (for probable scenario) and HUF -55 million (for alternative scenario) on the government bond portfolio held for hedging (economic).

The net interest income in a one year period after 1 January 2024 would be decreased by HUF 6.355 million (probable scenario) and increased by HUF 999 million (alternative scenario) as a result of these simulation. Besides the effect is further increased by capital gains HUF +429 million (for probable scenario), HUF -104 million (for alternative scenario) as at 31 December 2024 on the government bond portfolio held for hedging (economic).

Furthermore, the effects of an instant 10bps parallel shift of the HUF, EUR and USD yield-curves on net interest income over a one-year period and on the market value of the hedge government bond portfolio booked against capital was analysed. The results can be summarized as follows (in HUF million):

Description	2025		2024	
	Effects to the net interest income (one-year period)	Effects to shareholder's equity (Price change of FVOCI government bonds)	Effects to the net interest income (one-year period)	Effects to shareholder's equity (Price change of FVOCI government bonds)
HUF (0.1%) parallel shift	(1,142)	1	(327)	7
HUF 0.1% parallel shift	1,141	(1)	323	(7)
EUR (0.1%) parallel shift	106	-	928	-
EUR 0.1% parallel shift	(483)	-	(1,347)	-
USD (0.1%) parallel shift	230	-	446	-
USD 0.1% parallel shift	(211)	-	(453)	-
<b>Total</b>	<b><u>(359)</u></b>	<b><u>≡</u></b>	<b><u>(430)</u></b>	<b><u>≡</u></b>

**36.5.4. Equity price sensitivity analysis**

The following table shows the effect of the equity price sensitivity. The Bank uses VaR calculation with 1 day holding period and a 99% confidence level. The VaR methodology is a statistically defined, probability-based approach that takes into account market volatilities as well as risk diversification by recognizing offsetting positions and correlations between products and markets. The daily loss will not exceed the reported VaR number with 99% of probability.

The stress test assumes the largest price movement of the last year and calculates with it as the adverse direction. These scenarios show the loss of the portfolio when all prices change with the maximum amount of the last year.

Description	2025	2024
VaR (99%, one day, million HUF)	11	9
Stress test (million HUF)	(23)	(53)

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.6 Capital management****Capital management**

The primary objective of the capital management of the Bank is to ensure the prudent operation, the entire compliance with the prescriptions of the regulator for a persistent business operation and maximising the shareholder value, accompanied by an optimal financing structure.

The capital management of the Bank includes the management and evaluation of the shareholders' equity available for hedging risks, other types of funds to be recorded in the equity and all material risks to be covered by the capital.

The basis of the capital management of the Bank in the short run is the continuous monitoring of its capital position, in the long run the strategic and the business planning, which includes the monitoring and forecast of the capital position of the Bank.

The Bank maintains the capital adequacy required by the regulatory bodies and the planned risk taking mainly by means of ensuring and developing its profitability. In case the planned risk level of the Bank exceeded its Core and Supplementary capital, the Bank ensures the prudent operation by occasional measures. A further tool in the capital management of the Bank is the dividend policy, and the transactions performed with the treasury shares.

**Capital adequacy<sup>1</sup>**

The Capital Requirements Directive package (CRDIV/CRR) transposes the global standards on banking regulation (commonly known as the Basel III agreement) into the EU legal framework. The rules are applied from 1 January 2014. They set stronger prudential requirements for institutions, requiring them to keep sufficient capital reserves and liquidity. This framework makes institutions in the EU more solid and strengthens their capacity to adequately manage the risks linked to their activities, and absorb any losses they may incur in doing business.

The Bank has entirely complied with the regulatory capital requirements in 2025 as well as in 2024.

The Bank's capital adequacy calculation is in line with IFRS and based on Basel III as at 31 December 2025 and 31 December 2024. The Bank uses the standard method for determining the regulatory capital requirements of the credit risk and market risk while in case of the operational risk the Advanced Measurement Approach (AMA).

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<sup>1</sup> The dividend amount planned to pay out / paid out is deducted from reserves.

**NOTE 36: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****36.6 Capital management [continued]****Capital adequacy<sup>1</sup> [continued]**

The calculation of the Capital Adequacy ratio as at 31 December 2025 and 31 December 2024 is as

	<b>31 December 2025</b>	<b>31 December 2024</b>
	<b>Basel III</b>	<b>Basel III</b>
Core capital (Tier 1)	2,631,086	2,519,969
<i>Primary core capital (CET1)</i>	2,631,086	2,519,969
<i>Supplementary core capital (AT1)</i>	-	-
Supplementary capital (Tier 2)	461,223	345,063
<b>Regulatory capital</b>	<b><u>3,092,309</u></b>	<b><u>2,865,032</u></b>
Credit risk capital requirement	837,975	724,495
Market risk capital requirement	21,162	28,374
Operational risk capital requirement	126,234	29,872
<b>Total eligible regulatory capital</b>	<b><u>985,371</u></b>	<b><u>782,741</u></b>
<b>Surplus capital</b>	<b><u>2,106,938</u></b>	<b><u>2,082,291</u></b>
CET 1 ratio	21.36%	25.76%
<b>Capital adequacy ratio</b>	<b><u>25.11%</u></b>	<b><u>29.28%</u></b>

**Basel III:**Common equity Tier 1 capital (CET1):

Issued capital, Capital reserve, useable part of Tied-up reserve, General reserve, Profit reserve, Profit for the year, Treasury shares, Intangible assets, deductions due to investments, adjustments due to temporary disposals

Tier 2 capital:

Subsidiary loan capital, Subordinated loan capital, deductions due to repurchased loan capital and Subordinated loan capital issued by the OTP Bank, adjustments due to temporary disposals.

<sup>1</sup> The dividend amount planned to pay out / paid out is deducted from reserves.



**NOTE 38: OFF-BALANCE SHEET ITEMS (in HUF mn) [continued]****Legal disputes**

At the balance sheet date the Bank was involved in various claims and legal proceedings of a nature considered normal to its business. The level of these claims and legal proceedings corresponds to the level of claims and legal proceedings in previous years.

The Bank believes that the various asserted claims and litigations in which it is involved will not materially affect its financial position, future operating results or cash flows, although no assurance can be given with respect to the ultimate outcome of any such claim or litigation.

Provision due to legal disputes was HUF 276 million and HUF 283 million as at 31 December 2025 and 31 December 2024, respectively. (See Note 24.)

**Commitments to extend credit, guarantees and letter of credit**

The primary purpose of these instruments is to ensure that funds are available to a customer as required. Guarantees and standby letters of credit, which represent irrevocable assurances that the Bank will make payments in the event that a customer cannot meet its obligations to third parties, carry the same credit risk as loans.

Documentary and commercial letters of credit, which are written undertakings by the Bank on behalf of a customer authorising a third party to draw drafts on the Bank up to a stipulated amount under specific terms and conditions, are collateralised by the underlying shipments of goods to which they relate and therefore carry less risk than a direct borrowing.

Commitments to extend credit represent unused portions of authorisations to extend credit in the form of loans, guarantees or letters of credit. With respect to credit risk on commitments to extend credit, the Bank is potentially exposed to loss in an amount equal to the total unused commitments. However, the likely amount of loss is less than the total unused commitments since most commitments to extend credit are contingent upon customers maintaining specific credit standards.

Guarantees, irrevocable letters of credit and undrawn loan commitments are subject to similar credit risk monitoring and credit policies as utilised in the extension of loans. The Management of the Bank believes the market risk associated with guarantees, irrevocable letters of credit and undrawn loan commitments are minimal.

**Guarantees, payment undertakings arising from banking activities**

Payment undertaking is a promise by the Bank to assume responsibility for the debt obligation of a borrower if that borrower defaults until a determined amount and until a determined date, in case of fulfilling conditions, without checking the underlying transactions. The guarantee's liability is joint and primary with the principal, in case of payment undertaking, while the Bank assumes the obligation derived from guarantee independently by the conditions established by the Bank. A guarantee is most typically required when the ability of the primary obligor or principal to perform its obligations under a contract is in question, or when there is some public or private interest which requires protection from the consequences of the principal's default or delinquency.

**Contingent liabilities related to OTP Mortgage Bank Ltd.**

Under a syndication agreement with its wholly owned subsidiary, OTP Mortgage Bank Ltd., the Bank had guaranteed, in return for an annual fee, to purchase all mortgage loans held by OTP Mortgage Bank Ltd. that become non-performing. According to the arrangement the repurchase guarantee was cancelled and OTP Bank Plc. gives bail to the loans originated or purchased by the Bank.

**NOTE 39: SHARE-BASED PAYMENT AND EMPLOYEE BENEFIT (in HUF mn)**

Previously approved option program required a modification thanks to the introduction of the Bank Group Policy on Payments accepted in resolution of Annual General Meeting regarding to the amendment of CRD III. Directives and Act on Credit Institutions and Financial Enterprises.

Key management personnel affected by the Bank Group Policy receive compensation based on performance assessment generally in the form of cash bonus and equity shares in a ratio of 50-50%. Assignment is based on OTP shares, furthermore performance based payments are deferred in accordance with the rules of Credit Institutions Act.

OTP Bank ensures the share-based payment part for the management personnel of OTP Group members.

During implementation of the Remuneration Policy of the Group it became apparent that in case of certain foreign subsidiaries it is not possible to ensure the originally determined share-based payment because of legal reasons – incompatible with relevant EU-directives –, therefore a decision was made to cancel the share-based payment in affected countries, and virtual share based payment – cash payment fixed to share price - was made from 2017. In case of foreign subsidiaries virtual share based payment was made uniformly from 2021 (in case of payments related to 2021).

The quantity of usable shares for individuals calculated for settlement of share-based payment shall be determined as the ratio of the amount of share-based payment and share price determined by Supervisory Board.

The value of the share-based payment at the performance assessment is determined within 10 days by Supervisory Board based on the average of the three previous trade day's middle rate of OTP Bank's equity shares fixed on the Budapest Stock Exchange.

At the same time the conditions of discounted share-based payment are determined, and share-based payment shall contain maximum HUF 6,000 discount at the assessment date, and earnings for the shares at the payment date is maximum HUF 12,000.

Employee benefits are all forms of consideration given by an entity in exchange for service rendered by employees or for the termination of employment. IAS 19 Employee Benefits shall be applied in accounting for all employee benefits, except those to which IFRS 2 Share-based Payment applies.

Short-term employee benefits are employee benefits (other than termination benefits) that are expected to be settled wholly before twelve months after the end of the annual reporting period in which the employees render the related service. Post-employment benefits are employee benefits (other than termination and short-term employee benefits) that are payable after the completion of employment. Post-employment benefit plans are formal or informal arrangements under which an entity provides post-employment benefits for one or more employees. Post-employment benefit plans are classified as either defined contribution plans or defined benefit plans, depending on the economic substance of the plan as derived from its principal terms and conditions.

Termination benefits are employee benefits provided in exchange for the termination of an employee's employment as a result of either: an entity's decision to terminate an employee's employment before the normal retirement date or an employee's decision to accept an offer of benefits in exchange for the termination of employment. Other long-term employee benefits are all employee benefits other than short-term employee benefits, postemployment benefits and termination benefits.

**NOTE 39: SHARE-BASED PAYMENT AND EMPLOYEE BENEFIT (in HUF mn) [continued]**

The parameters for the share-based payment relating to ongoing years 2019-2024 for periods of each year as follows:

Year	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share
	Exercise price	Maximum earnings per share		Exercise price	Maximum earnings per share		Exercise price	Maximum earnings per share	
	for the year 2019			for the year 2020			for the year 2021		
2020	9,553	4,000	11,553	-	-	-	-	-	-
2021	9,553	4,000	11,553	12,644	9,000	16,644	-	-	-
2022	9,553	4,000	11,553	12,644	8,000	16,644	5,912	6,000	8,912
2023	9,553	4,000	11,553	13,644	8,000	16,644	6,912	7,000	8,912
2024	9,553	4,000	11,553	13,644	8,000	16,644	6,912	8,000	8,912
2025	9,553	4,000	11,553	13,644	8,000	16,644	6,912	9,000	8,912
2026	9,553	4,000	11,553	13,644	8,000	16,644	6,912	10,000	8,912
2027	-	-	-	13,644	8,000	16,644	6,912	10,000	8,912
2028	-	-	-	-	-	-	6,912	10,000	8,912

Year	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share
	Exercise price	Maximum earnings per share		Exercise price	Maximum earnings per share		Exercise price	Maximum earnings per share	
	for the year 2022			for the year 2023			for the year 2024		
2023	7,773	6,000	10,773	-	-	-	-	-	-
2024	8,773	7,000	10,773	14,486	12,000	17,486	-	-	-
2025	8,773	8,000	10,773	15,486	12,000	17,486	24,051	12,000	27,051
2026	8,773	9,000	10,773	16,486	12,000	17,486	25,051	12,000	27,051
2027	8,773	10,000	10,773	16,486	12,000	17,486	26,051	12,000	27,051
2028	8,773	10,000	10,773	16,486	12,000	17,486	26,051	12,000	27,051
2029	8,773	10,000	10,773	16,486	12,000	17,486	26,051	12,000	27,051
2030	-	-	-	16,486	12,000	17,486	26,051	12,000	27,051
2031	-	-	-	-	-	-	26,051	12,000	27,051

Relevant factors considered during measurement of fair value related to share-based payment as follows:

Year	Reference price	Assumed volatility	Risk-free interest rate (HUF)						
			1Y	2Y	3Y	4Y	5Y	6Y	7Y
2017	9,200	21.3%	0.1%	0.5%	0.7%	1.0%	1.3%	1.3%	1.3%
2018	10,064	26.0%	0.2%	0.6%	1.0%	1.3%	1.6%	1.9%	2.1%
2019	12,413	19.2%	0.2%	0.7%	0.9%	1.1%	1.3%	1.4%	1.6%
2020	11,553	33.6%	0.6%	0.4%	0.5%	0.6%	0.8%	0.9%	1.0%
2021	16,644	28.6%	1.0%	1.6%	1.8%	1.9%	2.0%	2.1%	2.1%
2022	8,912	42.6%	7.1%	7.9%	7.6%	7.3%	7.1%	7.0%	6.9%
2023	10,773	33.3%	13.2%	9.2%	8.2%	7.7%	7.3%	7.1%	6.9%
2024	17,486	22.1%	6.2%	5.8%	5.8%	5.9%	5.9%	6.0%	6.0%
2025	27,051	23.6%	6.0%	5.4%	5.4%	5.5%	5.6%	5.7%	5.8%

Év	Expected dividends (HUF/Share)							Pricing model
	1Y	2Y	3Y	4Y	5Y	6Y	7Y	
2017	219	219	252	290	334	384	442	Binomial
2018	219	219	219	219	219	219	219	Binomial
2019	252	290	333	383	440	507	583	Binomial
2020	219	252	290	333	383	440	507	Binomial
2021	371	321	357	393	432	475	523	Binomial
2022	452	497	547	601	661	728	800	Binomial
2023	300	330	363	399	439	483	531	Binomial
2024	714	786	864	951	1,046	1,150	1,265	Binomial
2025	1,179	1,296	1,426	1,568	1,725	1,897	2,087	Binomial

**NOTE 39: SHARE-BASED PAYMENT AND EMPLOYEE BENEFIT (in HUF mn) [continued]**

**Based on parameters accepted by Supervisory Board, relating to the year 2019 effective pieces are follows as at 31 December 2025:**

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable at 31 December 2025
Share-purchasing period started in 2020	91,403	91,403	12,218	-	-
Remuneration exchanged to share provided in 2020	22,806	22,806	11,897	-	-
Share-purchasing period starting in 2021	201,273	201,273	16,298	-	-
Remuneration exchanged to share applying in 2021	30,834	30,834	17,618	-	-
Share-purchasing period starting in 2022	107,760	101,897	13,771	5,863	-
Remuneration exchanged to share applying in 2022	10,564	10,564	8,529	-	-
Share-purchasing period starting in 2023	126,749	123,676	14,336	3,073	-
Remuneration exchanged to share applying in 2023	13,427	13,427	11,674	-	-
Share-purchasing period starting in 2024	31,262	31,262	17,618	-	-
Remuneration exchanged to share applying in 2024	6,183	6,183	17,540	-	-
Remuneration exchanged to share applying in 2025	1,000	1,000	27,928	-	-
Remuneration exchanged to share applying in 2026	-	-	-	-	500

**Based on parameters accepted by Supervisory Board, relating to the year 2020 effective pieces are follows as at 31 December 2025:**

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable at 31 December 2025
Share-purchasing period started in 2021	41,098	14,142	17,997	26,956	-
Remuneration exchanged to share provided in 2021	17,881	17,881	17,498	-	-
Share-purchasing period starting in 2022	83,688	76,928	17,629	6,760	-
Remuneration exchanged to share applying in 2022	15,232	15,111	8,529	121	-
Share-purchasing period starting in 2023	47,275	45,755	19,805	1,520	-
Remuneration exchanged to share applying in 2023	8,562	8,562	11,659	-	-
Share-purchasing period starting in 2024	49,974	49,974	20,867	-	-
Remuneration exchanged to share applying in 2024	11,837	11,837	17,613	-	-
Share-purchasing period starting in 2025	12,371	12,371	18,823	-	-
Remuneration exchanged to share applying in 2025	3,691	3,691	27,652	-	-
Remuneration exchanged to share applying in 2026	-	-	-	-	680
Remuneration exchanged to share applying in 2027	-	-	-	-	680

**NOTE 39: SHARE-BASED PAYMENT AND EMPLOYEE BENEFIT (in HUF mn) [continued]**

Based on parameters accepted by Supervisory Board, relating to the year 2021 effective pieces are follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable at 31 December 2025
Share-purchasing period started in 2022	60,018	59,776	10,122	242	-
Remuneration exchanged to share provided in 2022	11,028	11,028	8,691	-	-
Share-purchasing period starting in 2023	117,276	117,276	13,672	-	-
Remuneration exchanged to share applying in 2023	10,824	10,824	11,534	-	-
Share-purchasing period starting in 2024	50,402	50,083	17,838	319	-
Remuneration exchanged to share applying in 2024	4,807	4,807	17,399	-	-
Share-purchasing period starting in 2025	53,930	52,899	17,825	-	1,031
Remuneration exchanged to share applying in 2025	4,942	4,807	27,499	135	-
Share-purchasing period starting in 2026	-	-	-	-	58,155
Remuneration exchanged to share applying in 2026	-	-	-	-	4,942
Share-purchasing period starting in 2027	-	-	-	-	25,305
Remuneration exchanged to share applying in 2027	-	-	-	-	631

Based on parameters accepted by Supervisory Board, relating to the year 2022 effective pieces are follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable at 31 December 2025
Share-purchasing period started in 2023	57,412	57,364	13,484	48	-
Remuneration exchanged to share provided in 2023	8,726	8,590	11,629	136	-
Share-purchasing period starting in 2024	103,159	102,651	17,684	508	-
Remuneration exchanged to share applying in 2024	3,769	3,769	17,399	-	-
Share-purchasing period starting in 2025	42,463	41,650	18,164	-	813
Remuneration exchanged to share applying in 2025	3,769	3,769	26,914	-	-
Share-purchasing period starting in 2026	-	-	-	-	43,714
Remuneration exchanged to share applying in 2026	-	-	-	-	3,993
Share-purchasing period starting in 2027	-	-	-	-	44,701
Remuneration exchanged to share applying in 2027	-	-	-	-	3,993
Share-purchasing period starting in 2028	-	-	-	-	19,756
Remuneration exchanged to share applying in 2028	-	-	-	-	-

**NOTE 39: SHARE-BASED PAYMENT AND EMPLOYEE BENEFIT (in HUF mn) [continued]**

Based on parameters accepted by Supervisory Board, relating to the year 2023 effective pieces are follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable at 31 December 2025
Share-purchasing period starting in 2024	97,690	96,566	20,731	1,124	-
Remuneration exchanged to share applying in 2024	6,745	6,745	17,402	-	-
Share-purchasing period starting in 2025	188,376	162,349	19,525	-	26,027
Remuneration exchanged to share applying in 2025	6,527	6,527	27,194	-	-
Share-purchasing period starting in 2026	-	-	-	-	71,160
Remuneration exchanged to share applying in 2026	-	-	-	-	2,960
Share-purchasing period starting in 2027	-	-	-	-	81,415
Remuneration exchanged to share applying in 2027	-	-	-	-	2,960
Share-purchasing period starting in 2028	-	-	-	-	87,315
Remuneration exchanged to share applying in 2028	-	-	-	-	2,960
Share-purchasing period starting in 2029	-	-	-	-	39,324

Based on parameters accepted by Supervisory Board, relating to the year 2024 effective pieces are follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable at 31 December 2025
Share-purchasing period starting in 2025	73,713	73,713	26,808	-	-
Remuneration exchanged to share applying in 2025	5,967	5,967	26,898	-	-
Share-purchasing period starting in 2026	-	-	-	-	111,392
Remuneration exchanged to share applying in 2026	-	-	-	-	8,322
Share-purchasing period starting in 2027	-	-	-	-	52,041
Remuneration exchanged to share applying in 2027	-	-	-	-	3,421
Share-purchasing period starting in 2028	-	-	-	-	55,440
Remuneration exchanged to share applying in 2028	-	-	-	-	3,421
Share-purchasing period starting in 2029	-	-	-	-	59,682
Remuneration exchanged to share applying in 2029	-	-	-	-	3,421
Share-purchasing period starting in 2030	-	-	-	-	18,067
Remuneration exchanged to share applying in 2030	-	-	-	-	1,749

Effective pieces relating to the periods starting in 2026-2030 settled during valuation of performance of year 2021-2024, can be modified based on risk assessment and personal changes.

In connection with the share-based compensation for Board of Directors and connecting compensation, shares given as a part of payments detailed above and for the year 2025 based on performance assessment accounted as equity-settled share based transactions HUF 5,391 million was recognized as expense for the year ended 31 December 2025.

**NOTE 40: RELATED PARTY TRANSACTIONS (in HUF mn)**

Outstanding balances and transactions with related parties are summarized below in aggregate:

**Statement of financial position**

	31 December 2025		31 December 2024	
	Associated companies and other companies	Other related parties	Associated companies and other companies	Other related parties
Cash, amounts due from banks and balances with the National Bank of Hungary	19,690	-	38,696	-
Placements with other banks	2,878,108	-	2,696,016	-
Repo receivables	98,601	-	98,652	-
Held for trading securities	89	-	33	-
Held for trading derivative financial instruments:	51,904	-	39,210	-
Financial assets at fair value through other comprehensive income	232,288	-	306,412	-
Securities at amortised cost	-	621	-	614
Loans at amortised cost	694,243	75,323	779,287	52,607
Loans mandatorily measured at fair value through profit or loss	-	31	-	36
Right of use assets	23,882	-	23,159	-
Derivative financial assets designated as hedge accounting relationships	-	-	1,695	-
Other assets	<u>208,832</u>	<u>67</u>	<u>167,927</u>	<u>155</u>
<b>Total Assets</b>	<b><u>4,207,637</u></b>	<b><u>76,042</u></b>	<b><u>4,151,087</u></b>	<b><u>53,412</u></b>
Amounts due to banks and deposits from the National Bank of Hungary and	(1,143,353)	-	(892,432)	-
Repo liabilities	(211,420)	-	(95,509)	-
Deposits from customers	(233,294)	(32,133)	(296,116)	(24,271)
Leasing liabilities	(25,589)	-	(24,590)	-
Liabilities from issued securities	(17,818)	-	(15,154)	-
Derivative financial liabilities designated as held for trading	(13,714)	-	(26,420)	-
Derivative financial liabilities designated as hedge accounting relationships	-	-	(15,141)	-
Other liabilities	<u>(16,106)</u>	<u>(27)</u>	<u>(13,154)</u>	<u>(27)</u>
<b>Total Liabilities</b>	<b><u>(1,661,294)</u></b>	<b><u>(32,160)</u></b>	<b><u>(1,378,516)</u></b>	<b><u>(24,298)</u></b>
<b>Off balance sheet items</b>				
Guarantees	(1,312,440)	(12,844)	(1,168,778)	(6,965)
Loan commitments	(43,791)	(104,873)	(53,202)	(47,627)
Factoring loan commitments	(1,050)	(5,314)	(960)	(6,045)
Letter of credit	=	=	(86)	=
<b>Total</b>	<b><u>(1,357,281)</u></b>	<b><u>(123,031)</u></b>	<b><u>(1,223,026)</u></b>	<b><u>(60,637)</u></b>

**NOTE 40: RELATED PARTY TRANSACTIONS (in HUF mn) [continued]**

Outstanding balances and transactions with related parties are summarized below in aggregate: [continued]

**Statement of Profit or Loss**

	Year ended 31 December 2025	Year ended 31 December 2024
Interest Income	302,478	351,675
Interest Expense	(151,716)	(225,063)
Risk cost	2,003	2,665
(Losses)/Gains arising from derecognition of financial assets measured at amortised cost	(379)	45
Income from fees and commissions	67,689	53,296
Expenses from fees and commissions	(1,705)	(1,954)
Other administrative expenses	(13,432)	(12,461)

**Related party transactions with key management**

The compensation of key management, such as the members of the Board of Directors, the members of the Supervisory Board and the employees involved in the decision-making process in accordance with the compensation categories defined in IAS 24 Related Party Disclosures, is summarised below:

	31 December 2025	31 December 2024
Short-term employee benefits	4,506	4,123
Share-based payment	4,297	3,351
Long-term employee benefits (on the basis of IAS 19)	401	355
<b>Total</b>	<b><u>9,204</u></b>	<b><u>7,829</u></b>

	31 December 2025	31 December 2024
Loans provided to companies owned by the Management (in the normal course of business)	75,323	52,607
Commitments to extend credit and bank guarantees	123,031	60,637

An analysis of payment to Executives related to their activity in Board of Directors and Supervisory Board is as follows (in HUF mn):

	31 December 2025	31 December 2024
Members of Board of Directors	3,023	2,107
Members of Supervisory Board	270	253
<b>Total</b>	<b><u>3,293</u></b>	<b><u>2,360</u></b>

In the normal course of business, OTP Bank enters into other transactions with its subsidiaries, the amounts and volumes of which are not significant to these financial statements taken as a whole.

**NOTE 41: TRUST ACTIVITIES (in HUF mn)**

The Bank acts as a trustee for certain loans granted by companies or employers to their employees, mainly for housing purposes. The ultimate risk for these loans rests with the party advancing the funds. As these loans and related funds are not considered to be assets or liabilities of the Bank, they have been excluded from the accompanying separate statement of financial position.

	31 December 2025	31 December 2024
Loans managed by the Bank as a trustee	26,809	25,691

**NOTE 42: CONCENTRATION OF ASSETS AND LIABILITIES**

31 December 2025 31 December 2024

**In the percentage of the total assets**

Receivables from, or securities issued by the Hungarian Government or the NBH	27.39%	25.61%
Securities issued by the OTP Mortgage Bank Ltd.	1.22%	1.67%
Loans at amortised cost	7.07%	6.55%

There were no other significant concentrations of the assets or liabilities of the Bank as at 31 December 2025 or 31 December 2024.

OTP Bank continuously provides the Authority with reports on the extent of dependency on large depositors as well as the exposure of the largest 50 depositors towards OTP Bank. Further to this obligatory reporting to the Authority, OTP Bank pays particular attention on the exposure of its largest partners and cares for maintaining a closer relationship with these partners in order to secure the stability of the level of deposits.

The organisational unit of OTP Bank in charge of partner-risk management analyses the largest partners on a constant basis and sets limits on OTP Bank's and the Group's exposure separately partner-by-partner. If necessary, it modifies partner-limits in due course thereby reducing the room for manoeuvring of the Treasury and other business areas.

The Bank's internal regulation (Limit-management regulation) controls risk management which related to exposures of clients. Bank makes a difference between clients or clients who are economically connected with each other, partners, partners operating in the same geographical region or in the same economic sector, exposures from customers. Limit-management regulation includes a specific range provisions system used by Bank to control risk exposures. This regulation has to be used by the Bank for its business (lending) risk-taking activity in both the retail and corporate sector.

To specify credit risk limits, the Bank strives their clients get an acceptable margin of risk based on their financial situation. In the Bank limit system a lower level decision-making delegation has to be provided.

If an OTP group member takes risk against a client or group of clients (either inside the local economy or outside), the client will be qualified as a group level risk and these limits will be specified at group level.

The validity period of this policy is 12 months. The limit shall be reviewed prior to the expiry date but at least once a year based on the relevant information required to limit calculations.

The maximum credit exposure to any client or counterparty among Loans at amortised cost was HUF 1,344 billion and HUF 1,205 billion as at 31 December 2025 and 31 December 2024 respectively, before taking into account collateral or other credit enhancements.

**NOTE 43: EARNINGS PER SHARE**

Earnings per share attributable to the Bank's ordinary shares are determined by dividing Net profit for the year attributable to ordinary shareholders, after the deduction of declared preference dividends, by the weighted average number of ordinary shares outstanding during the year. Dilutive potential ordinary shares are deemed to have been converted into ordinary shares.

	31 December 2025	31 December 2024
Profit after income tax attributable to ordinary shareholders (in HUF mn)	663,259	744,999
Weighted average number of ordinary shares outstanding during the year for calculating basic EPS (number of share)	269,217,992	276,764,525
<b>Basic Earnings per share (in HUF)</b>	<b><u>2,464</u></b>	<b><u>2,692</u></b>
Separate profit after income tax attributable to ordinary shareholders (in HUF mn)	663,259	744,999
Modified weighted average number of ordinary shares outstanding during the year for calculating diluted EPS (number of share)	269,223,428	276,769,730
<b>Diluted Earnings per share (in HUF)</b>	<b><u>2,464</u></b>	<b><u>2,692</u></b>

	31 December 2025	31 December 2024
Weighted average number of ordinary shares	280,000,010	280,000,010
Average number of Treasury shares	(10,782,018)	(3,235,485)
<b>Weighted average number of ordinary shares outstanding during the year for calculating basic EPS</b>	<b><u>269,217,992</u></b>	<b><u>276,764,525</u></b>
Dilutive effect of options issued in accordance with the Remuneration Policy / Management Option Program and	5,436	5,205
<b>The modified weighted average number of ordinary shares outstanding during the year for calculating diluted EPS</b>	<b><u>269,223,428</u></b>	<b><u>276,769,730</u></b>

**NOTE 44: NET GAIN OR LOSS REALISED ON FINANCIAL INSTRUMENTS (in HUF mn)**

Year ended 31 December 2025	Net interest income and expense	Net non-interest gain and loss	Loss allowance	Other comprehensi ve income
<b>Financial assets measured at amortised cost</b>				
Cash, amounts due from banks and balances with the National Bank of Hungary	139,361	-	-	-
Placements with other banks	166,936	-	(1,219)	-
Repo receivables	19,701	-	(152)	-
Loans	408,116	18,723	11,593	-
Securities at amortised cost	<u>177,115</u>	<u>(2,315)</u>	<u>(5,073)</u>	-
<b>Financial assets measured at amortised cost total</b>	<b><u>911,229</u></b>	<b><u>16,408</u></b>	<b><u>5,149</u></b>	-
<b>Financial assets measured at fair value</b>				
Securities held for trading	5,350	7,142	-	-
Securities at fair value through other comprehensive income	41,310	284	972	(641)
Equity instruments at fair value through other comprehensive income	-	405	-	(741)
Loans mandatorily measured at fair value through profit or loss	<u>79,558</u>	<u>(7,152)</u>	<u>(1,016)</u>	-
<b>Financial assets measured at fair value total</b>	<b><u>126,218</u></b>	<b><u>679</u></b>	<b><u>(44)</u></b>	<b><u>(1,382)</u></b>
<b>Financial liabilities measured at amortised cost</b>				
Amounts due to banks and deposits from the National Bank of Hungary and other banks	(69,649)	-	-	-
Repo liabilities	(55,774)	-	-	-
Deposits from customers	(174,207)	323,934	-	-
Leasing liabilities	(3,029)	-	-	-
Liabilities from issued securities	(79,699)	-	-	-
Subordinated bonds and loans	<u>(39,349)</u>	-	-	-
<b>Financial liabilities measured at amortised cost total</b>	<b><u>(421,707)</u></b>	<b><u>323,934</u></b>	-	-
<b>Financial liabilities designated to measure at fair value through profit or loss</b>	<b>(823)</b>	<b>228</b>	-	-
<b>Derivative financial instruments</b>	<b><u>(11,339)</u></b>	<b><u>30,159</u></b>	-	-
<b>Total</b>	<b><u>603,578</u></b>	<b><u>371,408</u></b>	<b><u>5,105</u></b>	<b><u>(1,382)</u></b>

**Current year change of derivative financial assets and liabilities held-for-trading and designated as hedge accounting by types of results in the profit or loss for the year ended 31 December 2025**

	Held-for-trading	Hedge accounting
<b>Balance as at 1 January</b>	<b>26,562</b>	<b>23,692</b>
<b>Change in current period</b>		
on interest income/interest expense	(7,372)	752
on net results on derivative instruments and hedge relationships	87,732	45,568
on revaluation difference	(56,773)	(50,380)
Realized result on closed deals /matured deals	14,492	785
<b>Closing balance</b>	<b><u>64,641</u></b>	<b><u>20,417</u></b>

**NOTE 44: NET GAIN OR LOSS REALISED ON FINANCIAL INSTRUMENTS**  
(in HUF mn) [continued]

Year ended 31 December 2024	Net interest income and expense	Net non-interest gain and loss	Loss allowance	Other comprehen- sive income
<b>Financial assets measured at amortised cost</b>				
Cash, amounts due from banks and balances with the National Bank of	159,459	-	-	-
Placements with other banks	179,241	-	(233)	-
Repo receivables	14,663	-	(13)	-
Loans	437,745	16,730	20,201	-
Securities at amortised cost	<u>216,762</u>	<u>(7,871)</u>	<u>10,568</u>	-
<b>Financial assets measured at amortised cost total</b>	<b><u>1,007,870</u></b>	<b><u>8,859</u></b>	<b><u>30,523</u></b>	-
<b>Financial assets measured at fair</b>				
Securities held for trading	3,183	3,585	-	-
Securities at fair value through other comprehensive income	30,311	855	24,560	9,751
Equity instruments at fair value through other comprehensive income	-	344	-	11,547
Loans mandatorily measured at fair value through profit or loss	<u>62,663</u>	<u>28,685</u>	<u>(4,193)</u>	-
<b>Financial assets measured at fair value total</b>	<b><u>96,157</u></b>	<b><u>33,469</u></b>	<b><u>20,367</u></b>	<b><u>21,298</u></b>
<b>Financial liabilities measured at amortised cost</b>				
Amounts due to banks and deposits from the National Bank of Hungary and	(100,605)	-	-	-
Repo liabilities	(70,496)	-	-	-
Deposits from customers	(205,751)	262,477	-	-
Leasing liabilities	(3,147)	-	-	-
Liabilities from issued securities	(94,253)	-	-	-
Subordinated bonds and loans	<u>(30,163)</u>	-	-	-
<b>Financial liabilities measured at amortised cost total</b>	<b><u>(504,415)</u></b>	<b><u>262,477</u></b>	-	-
<b>Financial liabilities designated to measure at fair value through</b>	<b>(1,344)</b>	<b>1,240</b>	-	-
<b>Derivative financial instruments</b>	<b><u>(76,343)</u></b>	<b><u>(6,063)</u></b>	-	-
<b>Total</b>	<b><u>521,925</u></b>	<b><u>299,982</u></b>	<b><u>50,890</u></b>	<b><u>21,298</u></b>

**Current year change of derivative financial assets and liabilities held-for-trading and designated as hedge  
accounting by types of results in the profit or loss for the year ended 31 December 2024**

	Held-for-trading	Hedge accounting
<b>Balance as at 1 January</b>	<b>13,234</b>	<b>(5,795)</b>
<b>Change in current period</b>		
on interest income/interest expense	16,505	10,138
on net results on derivative instruments and hedge relationships	(98,566)	44,666
on revaluation difference	71,775	-
Realized result on closed deals /matured deals	23,614	(25,317)
<b>Closing balance</b>	<b><u>26,562</u></b>	<b><u>23,692</u></b>

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn)**

In determining the fair value of a financial asset or liability the Bank in the case of instruments that are quoted on an active market uses the market price. In most cases market price is not publicly available so the Bank has to make assumptions or use valuation techniques to determine the fair value of a financial instrument. See Note 45.4. for more information about fair value classes applied for financial assets and liabilities measured at fair value in these financial statements.

To provide a reliable estimate of the fair value of those financial instrument that are originally measured at amortised cost, the Bank used the discounted cash flow analysis (loans, placements with other banks, amounts due to banks, deposits from customers). The fair value of issued securities and subordinated bonds is based on quoted prices (e.g. Reuters), Cash and amounts due from banks and balances with the National Bank of Hungary represent amounts available immediately thus the fair value equals to the cost.

The assumptions used when calculating the fair value of financial assets and liabilities when using valuation technique are the following:

- the discount rates are the risk free rates related to the denomination currency adjusted by the appropriate risk premium as of the end of the reporting period,
- the contractual cash flows are considered for the performing loans and for the non-performing loans, the amortised cost less impairment is considered as fair value,
- the future cash flows for floating interest rate instruments are estimated from the yield curves as of the end of the reporting period,
- the fair value of the deposit which can be due in demand cannot be lower than the amount payable on demand.

For classes of assets and liabilities not measured at fair value in the statement of financial position, the income approach was used to convert future cash flows to a single current amount. Fair value of current assets is equal to carrying amount, fair value of liabilities from issued securities and other bond-type classes of assets and liabilities not measured at fair value measured based on Reuters market rates and, fair value of other classes not measured at fair value of the statement of financial position are measured using the discounted cash flow method. Fair value of loans, net of allowance for loan losses measured using discount rate adjustment technique, the discount rate is derived from observed rates of return for comparable assets or liabilities that are traded in the market.

Methods and significant assumptions used to determine fair value of the different classes of financial instruments:

- Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities;
- Level 2: inputs other than quoted prices included within Level 1 that are observable for the asset or liability either directly or indirectly;
- Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

**Use of modified yield curve**

During the year ended 31 December 2025 and 2024 yield curves derived from hungarian government bonds (“ÁKK curve”) have become distorted due to certain market events, which means that real liquidity has concentrated on certain part of the yield curve. Therefore a modified yield curve - which is not observable on the market - has been used at the concerning fair value calculations. This yield curve is based on the relevant yield curve points of the original ÁKK curve. Based on Management’s discretion fair value calculated with modified yield curves can represent the perspective of market participants reliable at current market conditions.

For the year ended 31 December 2025 and 2024 modified yield curve was used for calculating fair value in case of subsidised personal loans represented in “Loans mandatorily measured at fair value through profit or loss” line.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.1. Fair value of financial assets and liabilities at amortised cost**

	31 December 2025					31 December 2024				
	Carrying amount	Fair value	Level 1	Level 2	Level 3	Carrying amount	Fair value	Level 1	Level 2	Level 3
Cash, amounts due from banks and balances with the National Bank of Hungary	1,359,760	1,359,760	1,359,760	-	-	2,075,179	2,075,179	2,075,179	-	-
Placements with other banks	3,161,544	3,349,433	1,357,762	1,991,671	-	2,948,536	3,134,255	1,288,299	1,845,956	-
Repo receivables	322,368	322,468	-	322,468	-	238,079	238,425	-	238,425	-
Securities at amortised cost	3,368,087	3,252,093	2,958,467	290,616	3,010	3,334,145	3,150,646	2,886,069	254,595	9,982
Loans at amortised cost	5,135,324	5,294,746	-	-	5,294,746	4,670,795	4,790,988	-	-	4,790,988
Other financial assets	<u>304,961</u>	<u>304,961</u>	=	=	<u>304,961</u>	<u>281,575</u>	<u>281,575</u>	=	=	<u>281,575</u>
<b>Total assets measured at amortised cost</b>	<b><u>13,652,044</u></b>	<b><u>13,883,461</u></b>	<b><u>5,675,989</u></b>	<b><u>2,604,755</u></b>	<b><u>5,602,717</u></b>	<b><u>13,548,309</u></b>	<b><u>13,671,068</u></b>	<b><u>6,249,547</u></b>	<b><u>2,338,976</u></b>	<b><u>5,082,545</u></b>
		-	-	-	-		-	-	-	-
Amounts due to banks, deposits from the National Bank of Hungary and other banks	1,656,367	1,591,416	1,207,602	383,814	-	1,606,969	1,569,047	599,597	969,450	-
Repo liabilities	377,532	382,213	-	382,213	-	227,632	233,891	-	233,891	-
Deposits from customers	11,392,198	11,398,683	-	11,398,683	-	10,896,227	10,897,287	-	10,897,287	-
Leasing liabilities	62,640	62,676	-	-	62,676	64,380	66,790	-	-	66,790
Liabilities from issued securities	1,341,250	1,381,141	1,381,141	-	-	1,750,893	1,788,620	1,788,620	-	-
Subordinated bonds and loans	493,587	494,122	494,122	-	-	362,271	365,170	365,170	-	-
Other financial liabilities	<u>421,404</u>	<u>421,404</u>	=	=	<u>421,404</u>	<u>337,616</u>	<u>337,616</u>	=	=	<u>337,616</u>
<b>Total liabilities measured at amortised cost</b>	<b><u>15,744,978</u></b>	<b><u>15,731,655</u></b>	<b><u>3,082,865</u></b>	<b><u>12,164,709</u></b>	<b><u>484,080</u></b>	<b><u>15,245,988</u></b>	<b><u>15,258,421</u></b>	<b><u>2,753,387</u></b>	<b><u>12,100,628</u></b>	<b><u>404,406</u></b>

**45.2. Derivative financial instruments**

OTP Bank regularly enters into hedging transactions in order to decrease its financial risks. However some economically hedging transaction do not meet the criteria to account for hedge accounting, therefore these transactions were accounted as derivatives held for trading. Net investment hedge in foreign operations is not applicable in separate financial statements.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.2. Derivative financial instruments [continued]**

The assessment of the hedge effectiveness (both for fair value hedges and cash flow hedges) to determine the economic relationship between the hedged item and the hedging instrument is accomplished with prospective scenario analysis via different rate shift scenarios of the relevant risk factor(s) of the hedged risk component(s). The fair value change of the hedged item and the hedging instrument is compared in the different scenarios. Economic relationship is justified if the change of the fair value of the hedged item and the hedging instrument are in the opposite direction and the absolute changes are similar amounts. The hedge ratio is determined as the ratio of the notional of the hedged item and the notional of the hedging instrument. The sources of hedge ineffectiveness are the not hedged risk components (e.g. change of cross currency basis spreads in case of interest rate risk hedges), slight differences in maturity dates and interest payment dates in case of fair value hedges, and differences between the carrying amount of the hedged item and the carrying amount of the hedging instrument in case of FX hedges (e.g. caused by interest rate risk components in the fair value of the hedging instrument).

**Fair value of derivative financial instruments<sup>1</sup>**

The Bank has the following held for trading derivatives and derivatives designated as hedge accounting:

	31 December 2025					31 December 2024				
	Before netting		Netting	After netting		Before netting		Netting	After netting	
	Assets	Liabilities		Assets	Liabilities	Assets	Liabilities		Assets	Liabilities
<b>Held for trading derivative financial instruments</b>										
Interest rate derivatives										
Interest rate swaps	82,264	(70,596)	69,442	12,822	(1,154)	104,130	(88,266)	89,523	14,607	1,257
Cross currency interest rate swaps	3,773	(3,200)	-	3,773	(3,200)	10,472	(10,558)	-	10,472	(10,558)
OTC options	334	(334)	-	334	(334)	462	(462)	-	462	(462)
Forward rate agreement	496	(31)	496	-	465	219	(172)	219	-	47
<b>Total interest rate derivatives (OTC derivatives)</b>	<b>86,867</b>	<b>(74,161)</b>	<b>69,938</b>	<b>16,929</b>	<b>(4,223)</b>	<b>115,283</b>	<b>(99,458)</b>	<b>89,742</b>	<b>25,541</b>	<b>(9,716)</b>
<i>From this: Interest rate derivatives cleared by NBH</i>	587	-	-	587	-	906	-	-	906	-
<b>Foreign exchange derivatives</b>										
Foreign exchange swaps	44,752	(34,285)	-	44,752	(34,285)	53,620	(48,969)	-	53,620	(48,969)
Foreign exchange forward	9,329	(12,910)	-	9,329	(12,910)	15,736	(8,440)	-	15,736	(8,440)
OTC options	2,445	(2,069)	-	2,445	(2,069)	1,433	(825)	-	1,433	(825)
Foreign exchange spot conversion	195	(213)	-	195	(213)	179	(266)	-	179	(266)
<b>Total foreign exchange derivatives (OTC derivatives)</b>	<b>56,721</b>	<b>(49,477)</b>	<b>-</b>	<b>56,721</b>	<b>(49,477)</b>	<b>70,968</b>	<b>(58,500)</b>	<b>-</b>	<b>70,968</b>	<b>(58,500)</b>

<sup>1</sup> Certain derivative financial assets and liabilities are offset and the net amount is presented in accordance with IAS 32 in the Statement of Financial Position. The Bank has the ability and the intention to settle those instruments on a net basis, which are settled through the same clearing house.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.2. Derivative financial instruments [continued]<sup>1</sup>****Fair value of derivative financial instruments [continued]**

	31 December 2025			31 December 2024							
	Before netting Assets	Liabilities	Netting	After netting Assets	Liabilities	Netting	Before netting Assets	Liabilities	Netting	After netting Assets	Liabilities
<b>Equity stock and index derivatives</b>											
Commodity Swaps	3,221	(2,620)	-	3,221	(2,620)	-	10,475	(10,616)	-	10,475	(10,616)
Equity swaps	8,219	(273)	-	8,219	(273)	-	-	(1,194)	-	-	(1,194)
<b>OTC derivatives</b>	<b>11,440</b>	<b>(2,893)</b>	<b>=</b>	<b>11,440</b>	<b>(2,893)</b>	<b>=</b>	<b>10,475</b>	<b>(11,810)</b>	<b>=</b>	<b>10,475</b>	<b>(11,810)</b>
Exchange traded futures and options	168	(648)	-	168	(648)	-	1,331	(728)	-	1,331	(728)
<b>Total equity stock and index derivatives</b>	<b>11,608</b>	<b>(3,541)</b>	<b>=</b>	<b>11,608</b>	<b>(3,541)</b>	<b>=</b>	<b>11,806</b>	<b>(12,538)</b>	<b>=</b>	<b>11,806</b>	<b>(12,538)</b>
<b>Derivatives held for risk management not designated in hedges</b>											
Interest rate swaps	46,388	(52,871)	22,533	23,855	(30,338)	71,779	(82,909)	28,980	42,799	(53,929)	
Foreign exchange swaps	3,996	(4,422)	-	3,996	(4,422)	9,689	(8,675)	-	9,689	(8,675)	
Forward	-	-	-	-	-	-	(72)	-	-	(72)	
Cross currency interest rate swaps	45,554	(2,021)	-	45,554	(2,021)	10,258	(1,069)	-	10,258	(1,069)	
<b>Total derivatives held for risk management not designated in hedges</b>	<b>95,938</b>	<b>(59,314)</b>	<b>22,533</b>	<b>73,405</b>	<b>(36,781)</b>	<b>91,726</b>	<b>(92,725)</b>	<b>28,980</b>	<b>62,746</b>	<b>(63,745)</b>	
<i>From this: Total derivatives cleared by NBH held for risk management</i>	18,805	-	-	18,805	-	28,788	-	-	28,788	-	
<b>Total Held for trading derivative financial instruments</b>	<b>251,134</b>	<b>(186,493)</b>	<b>92,471</b>	<b>158,663</b>	<b>(94,022)</b>	<b>289,783</b>	<b>(263,221)</b>	<b>118,722</b>	<b>171,061</b>	<b>(144,499)</b>	
<b>Derivative financial instruments designated as hedge accounting relationships</b>											
<b>Derivatives designated in cash flow hedges</b>											
Interest rate swaps	-	(5,438)	5,438	(5,438)	-	1	(8,453)	8,453	(8,452)	-	
<b>Total derivatives designated in cash flow hedges</b>	<b>=</b>	<b>(5,438)</b>	<b>5,438</b>	<b>(5,438)</b>	<b>=</b>	<b>1</b>	<b>(8,453)</b>	<b>8,453</b>	<b>(8,452)</b>	<b>=</b>	
<b>Derivatives designated in fair value hedges</b>											
Interest rate swaps	41,748	(15,281)	12,484	29,264	(2,797)	53,401	(19,975)	19,957	33,444	(18)	
Cross currency interest rate swaps	2,575	(3,885)	-	2,575	(3,885)	13,903	(19,420)	-	13,903	(19,420)	
<b>Total derivatives designated in fair value microhedges</b>	<b>44,323</b>	<b>(19,166)</b>	<b>12,484</b>	<b>31,839</b>	<b>(6,682)</b>	<b>67,304</b>	<b>(39,395)</b>	<b>19,957</b>	<b>47,347</b>	<b>(19,438)</b>	
Interest rate swaps	1,144	(446)	446	698	-	4,235	-	-	4,235	-	
<b>Total derivatives designated in fair value macrohedges</b>	<b>1,144</b>	<b>(446)</b>	<b>446</b>	<b>698</b>	<b>=</b>	<b>4,235</b>	<b>=</b>	<b>=</b>	<b>4,235</b>	<b>=</b>	
<i>From this: Total derivatives cleared by NBH held for hedging</i>	469	(3,140)	-	469	(3,140)	-	(1,764)	-	-	(1,764)	
<b>Total derivatives held for risk management (OTC derivatives)</b>	<b>45,467</b>	<b>(25,050)</b>	<b>18,368</b>	<b>27,099</b>	<b>(6,682)</b>	<b>71,540</b>	<b>(47,848)</b>	<b>28,410</b>	<b>43,130</b>	<b>(19,438)</b>	

<sup>1</sup> Certain derivative financial assets and liabilities are offset and the net amount is presented in accordance with IAS 32 in the Statement of Financial Position. The Bank has the ability and the intention to settle those instruments on a net basis, which are settled through the same clearing house.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.2. Derivative financial instruments [continued]<sup>1</sup>****Fair value of derivative financial instruments [continued]****Financial assets subject to offsetting, netting arrangement as at 31 December 2025**

12/31/2025

	Offsetting recognised on the balance sheet			Netting potential not recognised on the balance sheet			Assets not subject to netting arrangements	Total assets	Maximum exposure to risk
	Gross assets before offset	Offsetting with gross liabilities	Net assets recognised on the statement of financial position	Financial liabilities	Collateral received	Assets after consideration of netting potential	Assets recognised on the statement of financial position	Recognised in the statement of financial position	After consideration of netting potential
Derivative financial instruments	248,696	(111,285)	137,411	(32,501)	(43,413)	61,497	48,351	185,762	109,848

**Financial liabilities subject to offsetting, netting arrangement as at 31 December 2025**

12/31/2025

	Offsetting recognised on the balance sheet			Netting potential not recognised on the balance sheet			Assets not subject to netting arrangements	Total liabilities	Maximum exposure to risk
	Gross liabilities before offset	Offsetting with gross assets	Net liabilities recognised on the statement of financial position	Financial assets	Collateral pledged	Liabilities after consideration of netting potential	Liabilities recognised on the statement of financial position	Recognised in the statement of financial position	After consideration of netting potential
Derivative financial instruments	195,032	(111,285)	83,747	(32,501)	(19,826)	31,420	16,957	100,704	48,377

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]**

<sup>1</sup> Certain derivative financial assets and liabilities are offset and the net amount is presented in accordance with IAS 32 in the Statement of Financial Position. The Bank has the ability and the intention to settle those instruments on a net basis, which are settled through the same clearing house.

45.2. Derivative financial instruments [continued]<sup>1</sup>

## Fair value of derivative financial instruments [continued]

**Financial assets subject to offsetting, netting arrangement as at 31 December 2024**

12/31/2024	Offsetting recognised on the balance sheet			Netting potential not recognised on the balance sheet			Assets not subject to netting arrangements	Total assets	Maximum exposure to risk
	Gross assets before offset	Offsetting with gross liabilities	Net assets recognised on the statement of financial position	Financial liabilities	Collateral received	Assets after consideration of netting potential	Assets recognised on the statement of financial position	Recognised in the statement of financial position	After consideration of netting potential
Derivative financial instruments	315,026	(147,132)	167,894	(54,939)	(74,570)	38,385	46,297	214,191	84,682

**Financial liabilities subject to offsetting, netting arrangement as at 31 December 2024**

12/31/2024	Offsetting recognised on the balance sheet			Netting potential not recognised on the balance sheet			Assets not subject to netting arrangements	Total liabilities	Maximum exposure to risk
	Gross liabilities before offset	Offsetting with gross assets	Net liabilities recognised on the statement of financial position	Financial assets	Collateral pledged	Liabilities after consideration of netting potential	Liabilities recognised on the statement of financial position	Recognised in the statement of financial position	After consideration of netting potential
Derivative financial instruments	297,744	(147,132)	150,612	(54,939)	(60,586)	35,087	13,325	163,937	48,412

<sup>1</sup> Certain derivative financial assets and liabilities are offset and the net amount is presented in accordance with IAS 32 in the Statement of Financial Position. The Bank has the ability and the intention to settle those instruments on a net basis, which are settled through the same clearing house.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.3. Hedge accounting**

Interest rate risk management is centralized at OTP Bank. Interest rate risk exposures in major currencies are managed at HQ on consolidated level. Although risk exposures in local currencies are managed at subsidiary level, the respective decisions are subject to HQ approval. Interest rate risk is measured by simulating NII and EVE under different stress and plan scenarios, the established risk limits are described in „OTP Bank’s Group-Level Regulations on the Management of Liquidity Risk and Interest Rate Risk of Banking Book”. The interest rate risk management activity aims to stabilize NII within the approved risk limits.

The risk management objective of these hedge relationships is to mitigate the risk of clean fair value (i.e. excluding accrued interest) change of MIRS loans due to the change of interest rate reference indexes (BUBOR, EURIBOR, LIBOR, etc.) of the respective currency.

**Amount, timing and uncertainty of future cash flows - hedging instruments as at 31 December 2025 (amounts in million currency)****31 December 2025**

Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total
Fair Value Hedge	Interest rate risk	Interest rate swap						
		HUF						
		Notional	(1,996)	(3,312)	315,765	638,895	272,452	<b>1,221,804</b>
		Average Interest Rate (%)	1.79%	1.93%	4.59%	5.95%	6.31%	
		EUR						
		Notional	-	10	(650)	(1,750)	51	<b>(2,339)</b>
		Average Interest Rate (%)	-	-	3.57%	2.84%	2.32%	
		USD						
		Notional	-	-	(471)	(1,385)	20	<b>(1,836)</b>
Average Interest Rate (%)	-	-	3.70%	3.87%	1.65%			
Fair Value Hedge	FX & IR risk	Cross currency interest rate swap						
		EUR/HUF						
		Notional	-	-	2	4	8	<b>14</b>
		Average Interest Rate (%)	-	-	(1.74%)	(1.81%)	(1.82%)	
		Average FX Rate	-	-	309.84	307.91	307.71	

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.3. Hedge accounting [continued]****Amount, timing and uncertainty of future cash flows - hedging instruments as at 31 December 2025 (amounts in million currency) [continued]**

Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total
Fair Value Hedge	FX risk	Cross currency interest rate swap						
		EUR/HUF						
		Notional	-	3	176	1,414	-	1,593
		Average FX Rate	-	417.77	390.79	394.07	-	
Cash flow Hedge	Interest rate risk	Cross currency interest rate swap						
		RON/HUF						
		Notional	-	175	100	150	-	425
		Average FX Rate	-	72.75	73.61	79.02	-	
Cash flow Hedge	Interest rate risk	Interest rate swap						
		HUF						
		Notional	-	-	-	28,027	-	28,027
		Average Interest Rate	-	-	-	2.46	-	
Portfolio Fair Value	Interest rate risk	Interest rate swap						
		EUR						
		Notional	-	-	(170)	(680)	(35)	(885)
		Average Interest Rate	-	-	2.68	2.53	2.51	

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.3. Hedge accounting [continued]****Amount, timing and uncertainty of future cash flows - hedging instruments as at 31 December 2024 (amounts in million currency)**

Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total
Fair Value Hedge	Interest rate risk	Interest rate swap						
		HUF						
		Notional	(10,000)	(3,000)	22,342	283,607	26,800	319,749
		Average Interest Rate (%)	12.20%	1.20%	71.37%	4.21%	1.39%	
		EUR						
		Notional	-	-	(75)	(2,390)	-	(2,465)
		Average Interest Rate (%)	-	-	3.26%	3.05%	-	
		USD						
		Notional	-	-	-	(1,106)	47	(1,059)
		Average Interest Rate (%)	-	-	-	3.65%	4.18%	
		JPY						
		Notional	-	-	4,500	-	-	4,500
Average Interest Rate (%)	-	-	0.22%	-	-			
Fair Value Hedge	FX & IR risk	Cross currency interest rate swap						
		EUR/HUF						
		Notional	-	1	2	6	9	18
		Average Interest Rate (%)	-	(1.69%)	(1.69%)	(1.76%)	(1.82%)	
		Average FX Rate	-	310.04	310.04	308.93	307.71	

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.3. Hedge accounting [continued]**

Amount, timing and uncertainty of future cash flows - hedging instruments as at 31 December 2024 (amounts in million currency)

Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total
Fair Value Hedge	FX risk	Cross currency interest rate swap						
		EUR/HUF						
		Notional	-	-	191	1,474	-	1,665
		Average FX Rate	-	-	379.97	383.10	-	
		RON/HUF						
		Notional	-	175	450	425	-	1,050
Average FX Rate	-	79.76	80.30	75.17	-			
Cash flow Hedge	Interest rate risk	JPY/HUF						
		Notional	-	-	4,500	-	-	4,500
		Average FX Rate	-	-	2.43	-	-	
		Interest rate swap						
Portfolio Fair Value Hedge	Interest rate risk	HUF						
		Notional	-	-	-	28,027	-	28,027
		Average Interest Rate	-	-	-	2.46	-	
Portfolio Fair Value Hedge	Interest rate risk	EUR						
		Notional	-	-	(170)	(680)	(170)	(1,020)
		Average Interest Rate	-	-	2.93	2.57	2.51	

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.3. Hedge accounting [continued]****Derivative financial instruments designated as hedge accounting as follows:**

Type of instrument	Type of risk	Nominal amount of the hedging instrument	Carrying amount of the hedging instrument for the year ended 31 December 2025			Line item in the statement of financial position where the hedging instrument is located	Changes in fair value used for calculating hedge ineffectiveness for the year ended 31 December 2025		
			Before netting Assets	Liabilities	Netting			After netting Assets	Liabilities
<b>Fair value hedge - micro</b>									
Interest rate swap	Interest rate risk	2,872,107	41,748	(15,281)	12,484	29,264	(2,797)	Derivative assets (liabilities) held for risk management	(845)
Cross-currency swap	FX & IR risk	4,291	-	(1,054)	-	-	(1,054)	Derivative assets (liabilities) held for risk management	3
Cross-currency swap	FX risk	1,043,771	2,575	(2,831)	-	2,575	(2,831)	Derivative assets (liabilities) held for risk management	(1,243)
<b>Cash flow hedge</b>									
Interest rate swap	Interest rate risk	66,899	-	(5,438)	5,438	(5,438)	-	Derivative assets (liabilities) held for risk management	(27)
<b>Fair value hedge - macro</b>									
Interest rate swap	Interest rate risk	341,079	1,144	(446)	446	698	-	Derivative assets (liabilities) held for risk management	(446)

31 December 2025	Type of risk	Carrying amount of the hedged item		Accumulated amount of fair value hedge adjustments on the hedged item included in the carrying amount of the hedged item		Line item in the statement of financial position in which the hedged item is included
		Assets	Liabilities	Assets	Liabilities	
<b>Fair value hedges - micro</b>						
- Loans	<i>Interest rate risk</i>	19,260	-	(1,260)	-	- Loans
- Loans	<i>Interest rate risk</i>	-	14,062	-	-	(167) Amounts due to banks and deposits from the National Bank of Hungary and other banks
- Government bonds	<i>Interest rate risk</i>	795,192	-	(135)	-	- Securities at amortised cost
- Government bonds	<i>Interest rate risk</i>	480,240	-	(8,134)	-	- Securities at fair value through other comprehensive income
- Other securities	<i>Interest rate risk</i>	-	1,108,440	-	-	7,838 Liabilities from issued securities
- Other securities	<i>Interest rate risk</i>	-	454,862	-	-	8,350 Subordinated debts
- Loans	<i>FX &amp; IR risk</i>	2,273	-	(23)	-	- Loans
- Loans	<i>FX risk</i>	1,059,952	-	-	-	- Loans
- Government bonds	<i>FX risk</i>	32,134	-	-	-	- Securities at amortised cost
<b>Fair value hedges total</b>		<b><u>2,389,051</u></b>	<b><u>1,577,364</u></b>	<b><u>(9,552)</u></b>	<b><u>16,021</u></b>	
<b>Fair value hedges - macro</b>						
- Customer deposits	<i>Interest rate risk</i>	-	342,594	-	-	471 Customer deposits

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.3. Hedge accounting [continued]****Derivative financial instruments designated as hedge accounting as follows:**

	Type of instrument	Type of risk	Nominal amount of the hedging instrument	Carrying amount of the hedging instrument for the year ended As at 31 December 2024					Line item in the statement of financial position where the hedging instrument is located	Changes in fair value used for calculating hedge ineffectiveness for the year ended 31 December 2024
				Before netting Assets	Liabilities	Netting	After netting Assets	Liabilities		
<b>Fair value hedge</b>										
	Interest rate swap	Interest rate risk	2,177,310	53,401	(19,974)	19,957	33,444	(17)	Derivative assets (liabilities) held for risk management	(1,193)
	Cross-currency swap	FX & IR risk	5,265	-	(1,764)	-	-	(1,764)	Derivative assets (liabilities) held for risk management	(859)
	Cross-currency swap	FX risk	776,876	13,903	(17,657)	-	13,903	(17,657)	Derivative assets (liabilities) held for risk management	11,104
<b>Cash flow hedge</b>										
	Interest rate swap	Interest rate risk	66,899	1	(8,453)	8,453	(8,452)	-	Derivative assets (liabilities) held for risk management	(40)
<b>Fair value hedge - macro</b>										
	Interest rate swap	Interest rate risk	418,292	4,235	-	-	4,235	-	Derivative assets (liabilities) held for risk management	(30)

31 December 2024	Type of risk	Carrying amount of the hedged item		Accumulated amount of fair value hedge adjustments on the hedged item included in the carrying amount of the hedged item		Line item in the statement of financial position in which the hedged item is included
		Assets	Liabilities	Assets	Liabilities	
<b>Fair value hedges</b>						
- Loans	<i>Interest rate risk</i>	29,439	-	(3,049)	-	- Loans
- Loans	<i>Interest rate risk</i>	-	144,441	-	(3,618)	Loans
- Government bonds	<i>Interest rate risk</i>	354,572	-	(1,428)	-	Securities at amortised cost
- Government bonds	<i>Interest rate risk</i>	150,531	-	(17,620)	-	Securities at fair value through other comprehensive income
- Government bonds	<i>Interest rate risk</i>	-	-	-	-	Financial assets at fair value through profit or loss
- Other securities	<i>Interest rate risk</i>	4,101	-	(99)	-	Securities at fair value through other comprehensive income
- Other securities	<i>Interest rate risk</i>	-	1,242,277	-	17,930	Liabilities from issued securities
- Other securities	<i>Interest rate risk</i>	-	249,936	-	(3,474)	Subordinated debts
- Loans	<i>FX &amp; IR risk</i>	3,499	-	36	-	Loans
- Loans	<i>FX risk</i>	678,845	-	-	-	Loans
- Government bonds	<i>FX risk</i>	11,307	-	-	-	Securities at fair value through other comprehensive income
- Government bonds	<i>FX risk</i>	86,541	-	-	-	Securities at amortised cost
- Other securities	<i>FX risk</i>	=	14,053	=	=	Liabilities from issued securities
<b>Fair value hedges total</b>		<b>1,318,835</b>	<b>1,650,707</b>	<b>(22,160)</b>	<b>10,838</b>	
<b>Fair value hedges - macro</b>						
- Customer deposits	<i>Interest rate risk</i>	-	414,492	-	4,303	Customer deposits

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.3. Hedge accounting [continued]**

For the year ended 31 December 2025 OCI related to cash flow hedges as follows:

Type of risk	Carrying amount of the hedged item		Cash flow hedge reserve for year ended 31 December 2025	Line item in the statement of financial position in which the hedged item is included
	Assets	Liabilities		
Interest rate risk	28,027	-	2,082	Loans at amortised cost

For the year ended 31 December 2024 OCI related to cash flow hedges as follows:

Type of risk	Carrying amount of the hedged item		Cash flow hedge reserve for year ended 31 December 2024	Line item in the statement of financial position in which the hedged item is included
	Assets	Liabilities		
Interest rate risk	28,027	-	3,374	Loans at amortised cost

For the year ended 31 December 2025 change in basis swap spread recognised in OCI related to fair value hedges as follows:

Type of risk	Carrying amount of the hedged item		Items recognised in other comprehensive income	Change in the items recognized in other comprehensive income for the year ended 31 December 2025	Line item in the statement of financial position in which the hedged item is included
	Assets	Liabilities			
FX risk	1,059,952	-	(1,228)	(1,239)	Loans at amortised cost
FX risk	-	-	-	51	FVOCI debt securities
FX risk	32,134	-	203	(347)	Securities at amortised cost
FX risk	=	=	=	(16)	Liabilities from issued securities
	<b><u>1,092,086</u></b>	<b><u>=</u></b>	<b><u>(1,025)</u></b>	<b><u>(1,551)</u></b>	

For the year ended 31 December 2024 change in basis swap spread recognised in OCI related to fair value hedges as follows:

Type of risk	Carrying amount of the hedged item		Items recognised in other comprehensive income	Change in the items recognized in other comprehensive income Year ended 2024	Line item in the statement of financial position in which the hedged item is included
	Assets	Liabilities			
FX risk	678,846	-	11	(217)	Loans at amortised cost
FX risk	11,308	-	(51)	10	FVOCI debt securities
FX risk	86,541	-	549	549	Securities at amortised cost
FX risk	=	<u>14,053</u>	<u>16</u>	<u>16</u>	Liabilities from issued securities
	<b><u>776,695</u></b>	<b><u>14,053</u></b>	<b><u>525</u></b>	<b><u>358</u></b>	

Change in the fair value of the hedging instrument related to cash flow hedge

**31 December 2025**

Type of instrument	Type of risk	Change in the value of the hedging instrument recognised in cash flow hedge reserve	Hedge ineffectiveness recognised in profit or loss	Line item in profit or loss that includes hedge ineffectiveness
Interest rate swap	Interest rate risk	(1,291)	(27)	Interest Income from Placements with other banks, net of allowance for placement losses

**31 December 2024**

Type of instrument	Type of risk	Change in the value of the hedging instrument recognised in cash flow hedge reserve	Hedge ineffectiveness recognised in profit or loss	Line item in profit or loss that includes hedge ineffectiveness
Interest rate swap	Interest rate risk	(135)	(40)	Interest Income from Placements with other banks, net of allowance for placement losses

For the year ended 31 December 2024 and 2025 there were no reclassification from cash flow hedge reserve to profit or loss due to termination of hedging relationship.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.4. Fair value classes**

Methods and significant assumptions used to determine fair value of the different classes of financial instruments:

- Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities;
- Level 2: inputs other than quoted prices included within Level 1 that are observable for the asset or liability either directly or indirectly, Fair value measurements – in relation with instruments measured not at fair value – are categorized in level 2;
- Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

The following table shows an analysis of financial instruments recorded at fair value by level of the fair value hierarchy:

31 December 2025	Total	Level 1	Level 2	Level 3
Loans mandatorily at fair value through profit or loss	1,082,688	-	-	1,082,688
Financial assets at fair value through profit or loss	350,781	146,276	190,862	13,643
<i>from this: securities held for trading</i>	<i>159,194</i>	<i>118,883</i>	<i>40,311</i>	<i>-</i>
<i>from this: positive FVA of derivative financial instruments designated as held for trading</i>	<i>158,663</i>	<i>168</i>	<i>150,551</i>	<i>7,944</i>
<i>from this: securities mandatorily measured at fair value through profit or loss</i>	<i>32,924</i>	<i>27,225</i>	<i>-</i>	<i>5,699</i>
Equity instruments at fair value through other comprehensive income	43,929	43,929	-	-
Securities at fair value through other comprehensive income	1,221,514	685,402	525,899	10,213
Positive fair value of derivative financial instruments designated as hedge accounting	<u>27,099</u>	<u>=</u>	<u>27,099</u>	<u>=</u>
<b>Financial assets measured at fair value total</b>	<b><u>2,726,011</u></b>	<b><u>875,607</u></b>	<b><u>743,860</u></b>	<b><u>1,106,544</u></b>
Financial liabilities at fair value through profit or loss	15,279	-	-	15,279
Negative fair value of derivative financial instruments classified as held for trading	94,022	648	93,374	-
Short position	85,566	85,566	-	-
Negative fair value of derivative financial instruments designated as hedge accounting	<u>6,682</u>	<u>=</u>	<u>6,682</u>	<u>=</u>
<b>Financial liabilities measured at fair value total</b>	<b><u>201,549</u></b>	<b><u>86,214</u></b>	<b><u>100,056</u></b>	<b><u>15,279</u></b>

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.4. Fair value classes [continued]**

As at 31 December 2024	Total	Level 1	Level 2	Level 3
Loans mandatorily at fair value through profit or loss	998,410	-	-	998,410
Financial assets at fair value through profit or loss	651,236	87,226	556,789	7,221
<i>from this: securities held for trading</i>	447,993	60,934	387,059	-
<i>from this: positive FVA of derivative financial instruments designated as held for trading</i>	171,061	1,331	169,730	-
<i>from this: securities mandatorily measured at fair value through profit or loss</i>	32,182	24,961	-	7,221
Equity instruments at fair value through other comprehensive income	33,934	33,934	-	-
Securities at fair value through other comprehensive income	558,668	199,323	337,822	21,523
Positive fair value of derivative financial instruments designated as hedge accounting	<u>43,130</u>	-	<u>43,130</u>	-
<b>Financial assets measured at fair value total</b>	<b><u>2,285,378</u></b>	<b><u>320,483</u></b>	<b><u>937,741</u></b>	<b><u>1,027,154</u></b>
Financial liabilities at fair value through profit or loss	17,024	-	-	17,024
Negative fair value of derivative financial instruments classified as held for trading	144,499	728	142,577	1,194
Short position	47,157	47,157	-	-
Negative fair value of derivative financial instruments designated as hedge accounting	<u>19,438</u>	-	<u>19,438</u>	-
<b>Financial liabilities measured at fair value total</b>	<b><u>228,118</u></b>	<b><u>47,885</u></b>	<b><u>162,015</u></b>	<b><u>18,218</u></b>

The fair value of investment properties is presented in Note 14 and they are categorized in level 3.

The fair value of investment in subsidiaries is presented in Note 12 and they are categorized in level 3.

**Valuation techniques and sensitivity analysis on Level 2 instruments**

The fair value of Level 2 instruments is calculated by discounting their expected interest and capital cash flows. Discounting is done with the respective swap curve of each currency.

**Valuation techniques and sensitivity analysis on Level 3 instruments**

Sensitivity analysis is performed on products with significant unobservable inputs (Level 3) to generate a range of reasonably possible alternative valuations. The sensitivity methodologies applied take account of the nature of the valuation techniques used, as well as the availability and reliability of observable proxy and historical data and the impact of using alternative models.

The calculation is based on range or spread data of reliable reference source or a scenario based on relevant market analysis alongside the impact of using alternative models. Sensitivities are calculated without reflecting the impact of any diversification in the portfolio.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.4. Fair value classes [continued]****Unobservable inputs used in measuring fair value**

<b>Class of financial instrument</b>	<b>Type of financial instrument</b>	<b>Valuation technique</b>	<b>Significant unobservable input</b>	<b>Range of estimates for unobservable input</b>
Financial assets at fair value through profit or loss	VISA C shares	Market approach combined with expert judgement	Discount applied due to illiquidity and litigation	+/-12%
Loans mandatorily at fair value through profit or loss	MFB refinancing loans	Discounted cash flow model	Probability of default	+/- 20%
Loans mandatorily at fair value through profit or loss	Subsidised personal loans	Discounted cash flow model	Probability of default	+/- 20%
Loans mandatorily at fair value through profit or loss	Subsidised personal loans	Discounted cash flow model	Operational costs	+/- 20%
Loans mandatorily at fair value through profit or loss	Subsidised personal loans	Discounted cash flow model	Demography	Change in the cash flow estimation +/- 5%
Securities at fair value through other comprehensive income	FVOCI debt securities	Market approach combined with expert judgement	Credit risk	+/-15%

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.4. Fair value classes [continued]****The effect of unobservable inputs on fair value measurement**

Although the Bank believes that its estimates of fair value are appropriate, the use of different methodologies or assumptions could lead to different measurements of fair value. For fair value measurements in Level 3 changing the assumptions used to reasonably possible alternative assumptions would have the following effects.

31 December 2025	Class of financial instrument	Unobservable inputs	Carrying amount	Fair values		Effect on profit and loss	
				Favourable	Unfavourable	Favourable	Unfavourable
VISA C shares	Financial assets at fair value through profit or loss	Illiquidity	524	587	462	63	(63)
MFB refinancing loans	Loans mandatorily at fair value through profit or loss	Probability of default	15,300	15,626	14,974	326	(326)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Probability of default	1,065,200	1,065,780	1,064,613	580	(587)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Operational costs	1,065,200	1,071,294	1,058,826	6,094	(6,374)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Demography	1,065,200	1,065,427	1,065,016	227	(184)
Russian government bonds	Securities at fair value through other comprehensive income	Probability of default	10,213	17,607	2,819	7,394	(7,394)
31 December 2024	Class of financial instrument	Unobservable inputs	Carrying amount	Fair values		Effect on profit and loss	
				Favourable	Unfavourable	Favourable	Unfavourable
VISA C shares	Financial assets at fair value through profit or loss	Illiquidity	1,304	1,460	1,147	156	(156)
MFB refinancing loans	Loans mandatorily at fair value through profit or loss	Probability of default	15,094	15,663	14,525	569	(569)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Probability of default	980,378	980,991	979,766	613	(612)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Operational costs	980,378	987,263	973,579	6,885	(6,799)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Demography	980,378	981,238	979,693	860	(685)
Russian government bonds	Securities at fair value through other comprehensive income	Probability of default	21,523	31,903	11,143	10,380	(10,380)

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.4 Fair value classes [continued]****The effect of unobservable inputs on fair value measurement [continued]**

The favourable and unfavourable effects of using reasonably possible alternative assumptions for the valuation of Visa C shares have been calculated by modifying the discount rate used for the valuation by +/-12% as being the best estimates of the management as at 31 December 2025 and 31 December 2024 respectively.

In the case of MFB refinancing loans and subsidised personal loans the Bank calculated the favourable and unfavourable effects of using reasonably possible alternative assumptions by modifying the rates of probability of default by +/- 20% as one of the most significant unobservable input.

In the case of subsidised personal loans operational cost and factors related to demography are considered as unobservable inputs to the applied fair value calculation model in addition to credit risk.

The Bank calculated the favourable and unfavourable effects of using reasonably possible alternative assumptions by modifying the rates of operational costs by +/- 20% as one of the most significant unobservable input.

The applied cash flow model for subsidised personal loans uses more scenarios. These scenarios are based on relevant events, which have a relevant effect on the fair value and may occur during the term of the contract. These events can be for instance child births within the deadline (grace period, prepayment as part of government support), or loss of government support (divorce or unemployment as breach of conditions). The model uses public statistical information to estimate the outcome of these possible future events. In case of breach of the contractual terms subsidised loans are converted to loans provided based on market conditions. The Bank calculated the favourable and unfavourable effects of using reasonably possible alternative assumptions by modifying the demographical assumption of future child births by +/-5% as one of the most significant unobservable input in the cash flow estimation.

The favourable and unfavourable effects of using reasonably possible alternative assumptions for the valuation of FVOCI debt securities have been calculated by modifying the credit risk rate used for the valuation by +/-15% as being the best estimates of the management as at 31 December 2025 and 31 December 2024 respectively.

**NOTE 45: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****45.4 Fair value classes [continued]****The effect of unobservable inputs on fair value measurement [continued]****Reconciliation of the opening and closing balances of Level 3 instruments for year ended 31 December 2025**

	<b>Opening balance</b>	<b>Change in FVA due to credit risk</b>	<b>Change in FVA due to market factors</b>	<b>Purchases/ Disbursement</b>	<b>Settlement /Sales</b>	<b>Closing balance</b>
Loans mandatorily measured at fair value through profit or loss	998,410	1,016	(9,695)	162,705	(69,748)	1,082,688
Securities mandatorily measured at fair value through profit or loss	7,221	-	(1,539)	17	-	5,699
Derivative financial instruments designated as held for trading	(1,194)	-	9,138	-	-	7,944
Securities at fair value through other comprehensive income	21,523	(5,744)	4,522	-	(10,088)	10,213
Financial liabilities at fair value through profit or loss	<u>(17,024)</u>	=	<u>228</u>	=	<u>1,517</u>	<u>(15,279)</u>
<b>Total</b>	<b><u>1,008,936</u></b>	<b><u>(4,728)</u></b>	<b><u>2,654</u></b>	<b><u>162,722</u></b>	<b><u>(78,319)</u></b>	<b><u>1,091,265</u></b>

**Reconciliation of the opening and closing balances of Level 3 instruments for the year ended 31 December 2024**

	<b>Opening balance</b>	<b>Change in FVA due to credit risk</b>	<b>Change in FVA due to market factors</b>	<b>Purchases/ Disbursement</b>	<b>Settlement /Sales</b>	<b>Closing balance</b>
Loans mandatorily measured at fair value through profit or loss	934,848	4,193	26,449	100,081	(67,161)	998,410
Securities mandatorily measured at fair value through profit or loss	9,015	-	(1,794)	-	-	7,221
Derivative financial instruments designated as held for trading	(3,700)	-	2,506	-	-	(1,194)
Securities at fair value through other comprehensive income	30,873	2,568	(11,918)	-	-	21,523
Financial liabilities at fair value through profit or loss	<u>(19,786)</u>	=	<u>1,240</u>	=	<u>1,522</u>	<u>(17,024)</u>
<b>Total</b>	<b><u>951,250</u></b>	<b><u>6,761</u></b>	<b><u>16,483</u></b>	<b><u>100,081</u></b>	<b><u>(65,639)</u></b>	<b><u>1,008,936</u></b>

**NOTE 46: SIGNIFICANT EVENTS DURING THE YEAR ENDED 31 DECEMBER 2025****1) Term Note Program**

See details about the event in Note 20.

**2) Sell of OTP Card Factory Ltd.**

See details about the event in Note 12.

**3) Purchase of Mendota Invest Nепremičninska Družba d.o.o.**

See details about the event in Note 12.

**4) Significant regulatory changes in Hungary**

About the prolongation of deadline of interest rate cap, amending the previously laid down methodology of windfall tax calculation, the changes in savings and government bond markets, family support schemes, capital regulation and mandatory minimum reserve requirements please see details in Note 4.

**5) Contribution to the renovation of the Royal Castle of Gödöllő with a donation**

On 13 October 2025 OTP Bank Plc. has signed a tripartite agreement with the Government of Hungary and with the Foundation for the Hungarian University of Agriculture and Life Sciences. Based on the tripartite agreement, OTP Bank Plc provides a lump-sum, target-specific, nonrefundable, public interest grant as a donation to the Foundation for the Hungarian University of Agriculture and Life Sciences in the amount of HUF 20 billion for the complete renovation of the Royal Castle of Gödöllő and some of its associated properties (Park and Chapel).

The Royal Castle of Gödöllő and some of its properties will be renovated with the joint and same amount of support of the Government of Hungary and OTP Bank Plc, in total of HUF 40 billion undertaken by the sponsors. The renovation of the Royal Castle of Gödöllő and some of its properties falls within the scope of OTP Bank Plc's corporate social responsibility activities.

**6) Risk relating to the Russian-Ukrainian armed conflict**

In 2022 Russia launched a still ongoing war against Ukraine. Many countries, as well as the European Union imposed sanctions due to the armed conflict on Russia and Russian businesses and citizens. Russia responded to these sanctions with similar measures.

The war and the international sanctions influence the business and economic activities significantly all around the world. There are a number of factors associated with the Russian-Ukrainian armed conflict and the international sanctions as well as their impact on global economies that could have a material adverse effect on (among other things) the profitability, capital and liquidity of financial institutions such as the OTP Group.

The war and the international sanctions cause significant economic damage to the affected parties and in addition they cause disruptions in the global economic processes, and they have negative impact – interalia – on energy and grain markets, the global transport routes and international trade as well as on tourism.

OTP Group continues to monitor the situation closely. The OTP Group's ability to conduct business may be adversely affected by disruptions and restrictions to its infrastructure, business processes and technology services. This may cause significant customer detriment, costs to reimburse losses incurred by the OTP Group's customers, and reputational damage.

Furthermore, the OTP Group relies on models to support a broad range of business and risk management activities, including informing business decisions and strategies, measuring and limiting risk, valuing exposures, conducting stress testing and assessing capital adequacy. Models are, by their nature, imperfect and incomplete representations of reality because they rely on assumptions and inputs, and as such assumptions may later potentially prove to be incorrect, this can affect the accuracy of their outputs. This may be exacerbated when dealing with unprecedented scenarios, such as the Russian-Ukrainian armed conflict and the international sanctions, due to the lack of reliable historical reference points and data.

Any and all such events mentioned above could have a material adverse effect on the OTP Group's business, financial condition, results of operations, prospects, liquidity, capital position and credit ratings, as well as on the OTP Group's customers, employees and suppliers.

**NOTE 47: SIGNIFICANT EVENTS AFTER THE REPORTING PERIOD****Summary of economic policy measures made and other relevant regulatory changes as post-balance sheet events**

*On 28 February 2026, the United States and Israel carried out coordinated military strikes against Iran, in response to which Iran launched retaliatory missile and drone attacks against Israel and U.S. military facilities along the Persian Gulf. As a result, among other effects, global energy prices and foreign exchange rates became more volatile.*

**Hungary**

- The Monetary Council, in its decision of 13 January 2026, reduced the reserve requirement from 8% to 6%. The new requirement is to be applied by credit institutions starting from the reserve maintenance period commencing in March 2026.
- OTP Bank Plc. issued notes on 3 February 2026 as value date in the aggregate nominal amount of EUR 500 million. The coupon rate is 3.625% per annum, with a maturity structure of 6NC5. The notes are rated 'BBB' by az S&P Global Ratings Europe Limited and 'BBB+' by Scope Ratings GmbH. The notes are listed on the Luxembourg Stock Exchange.
- OTP Mortgage Bank on 12 February 2026 it has issued mortgage notes in aggregate nominal amount of EUR 500 million. The notes are rated 'A1' by Moody's Investor Service rating agency, the securities are listed on the Luxembourg Stock Exchange.
- According to the preliminary data published by the Central Statistical Office on 30 January 2026, the performance of the Hungarian economy grew by 0.2% q-o-q in the fourth quarter. Annual growth in 2025 reached 0.4%, 0.3% based on seasonally and calendar adjusted and balanced data. Average annual inflation in 2025 amounted to 4.4%.
- At its interest rate decision meeting on 24 February 2026, the National Bank of Hungary reduced the policy rate by 25 bps to 6.25%.
- As of 24 February 2026, the United States abolished the legally contested "reciprocal" tariffs targeting the European Union and replaced them with a uniform, country neutral 10% temporary ad valorem import surcharge for a period of 150 days, while sector specific tariffs (e.g. automotive and steel) remained unchanged. The amendment did not materially affect the tariff rates applied to goods imported from Hungary or the European Union into the United States.

# IFRS FINANCIAL STATEMENTS ON 2025

(CONSOLIDATED)

**OTP BANK PLC**  
**CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2025**  
(in HUF mn)

	Note	31/12/2025	31/12/2024
Cash, amounts due from banks and balances with the National Banks	5.	4,965,635	6,079,012
Placements with other banks	6.	1,991,489	1,891,901
Repo receivables	7.	237,144	331,837
Financial assets at fair value through profit or loss	8.	425,213	743,400
Securities at fair value through other comprehensive income	9.	2,046,414	1,705,553
Securities at amortized cost	10.	7,925,465	7,447,177
Loans at amortized cost	11.	22,299,578	20,290,381
Loans mandatorily at fair value through profit or loss	11.	1,941,222	1,559,781
Finance lease receivables	36.	1,588,550	1,511,477
Associates and other investments	12.	160,418	124,523
Property and equipment	13.	601,071	581,240
Intangible assets and goodwill	13.	385,796	356,564
Right-of-use assets	36.	81,587	79,830
Investment properties	14.	92,977	88,240
Derivative financial assets designated as hedge accounting	15.	29,625	50,381
Deferred tax assets	35.	76,274	56,583
Current income tax receivables	35.	31,296	7,060
Other assets	16.	<u>547,390</u>	<u>514,188</u>
<b>TOTAL ASSETS</b>		<b><u>45,427,144</u></b>	<b><u>43,419,128</u></b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks	17.	1,490,921	2,022,191
Repo liabilities	18.	166,809	132,137
Financial liabilities designated at fair value through profit or loss	19.	90,340	72,490
Deposits from customers	20.	33,732,764	31,658,189
Fair value changes of the hedged items in portfolio hedge of interest rate risk	20.	1,503	8,209
Liabilities from issued securities	21.	2,512,635	2,593,124
Derivative financial liabilities held for trading	22.	81,265	114,089
Derivative financial liabilities designated as hedge accounting	23.	11,501	14,605
Leasing liabilities	36.	82,401	82,109
Deferred tax liabilities	35.	28,347	32,637
Current income tax payable	35.	35,641	76,787
Provisions	24.	151,123	131,637
Other liabilities	24.	930,194	991,552
Subordinated bonds and loans	25.	<u>486,084</u>	<u>369,359</u>
<b>TOTAL LIABILITIES</b>		<b><u>39,801,528</u></b>	<b><u>38,299,115</u></b>
Share capital	26.	28,000	28,000
Retained earnings and reserves	27.	6,040,575	5,327,652
Treasury shares	28.	<u>(458,637)</u>	<u>(245,319)</u>
<b>Total equity attributable to the parent</b>		<b><u>5,609,938</u></b>	<b><u>5,110,333</u></b>
<b>Total equity attributable to non-controlling interest</b>	29.	<b><u>15,678</u></b>	<b><u>9,680</u></b>
<b>TOTAL SHAREHOLDERS' EQUITY</b>		<b><u>5,625,616</u></b>	<b><u>5,120,013</u></b>
<b>TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY</b>		<b><u>45,427,144</u></b>	<b><u>43,419,128</u></b>

Budapest, 17 March 2026

Dr. Sándor Csányi  
Chairman of the Board of Directors

Péter Csányi  
Chief Executive Officer

**OTP BANK PLC**  
**CONSOLIDATED STATEMENT OF PROFIT OR LOSS FOR THE**  
**YEAR ENDED 31 DECEMBER 2025**  
(in HUF mn)

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>CONTINUING OPERATIONS</b>			
Interest income calculated using the effective interest method	30.	2,774,226	2,542,138
Income similar to interest income	30.	574,954	539,984
<b>Interest income and income similar to interest income</b>		<b><u>3,349,180</u></b>	<b><u>3,082,122</u></b>
<b>Interest expense</b>		<b><u>(1,408,608)</u></b>	<b><u>(1,336,782)</u></b>
<b>NET INTEREST INCOME</b>		<b><u>1,940,572</u></b>	<b><u>1,745,340</u></b>
Loss allowance on loans, placements, amounts due from banks and on repo receivables	31.	(155,445)	(72,385)
Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit or loss	31.	111	5,504
Release of loss allowance / (Loss allowance) on securities at fair value through other comprehensive income and on securities at amortized cost	31.	7,417	(39,907)
Provision for commitments and guarantees given (Impairment) / Release of impairment of assets subject to operating lease and of investment properties	31.	(3,699)	17
<b>Risk cost total</b>		<b><u>(158,075)</u></b>	<b><u>(109,142)</u></b>
<b>NET INTEREST INCOME AFTER RISK COST</b>		<b><u>1,782,497</u></b>	<b><u>1,636,198</u></b>
<b>Loss from derecognition of financial assets at amortized cost</b>	<b>33.</b>	<b>(699)</b>	<b>(14,409)</b>
<b>Modification loss</b>	<b>4.</b>	<b>(9,383)</b>	<b>(13,193)</b>
Income from fees and commissions	32.	1,275,518	1,045,987
Expense from fees and commissions	32.	(249,271)	(203,332)
<b>Net profit from fees and commissions</b>		<b><u>1,026,247</u></b>	<b><u>842,655</u></b>
Foreign exchange result, net	33.	4,156	(12,048)
Gain on securities, net	33.	22,009	10,326
Fair value adjustment on financial instruments measured at fair value through profit or loss	33.	8,278	27,374
Net results on derivative instruments and hedge relationships	33.	(1,316)	12,004
Profit from associates	8., 9.	21,443	12,970
Goodwill impairment	13.	(674)	-
Other operating income	34.	144,130	147,895
Other operating expenses	34.	(152,797)	(127,174)
<b>Net operating income</b>		<b><u>45,229</u></b>	<b><u>71,347</u></b>
Personnel expenses	34.	(630,276)	(550,175)
Depreciation and amortization	13.	(153,126)	(134,293)
Other general expenses	34.	(659,238)	(528,306)
<b>Other administrative expenses</b>		<b><u>(1,442,640)</u></b>	<b><u>(1,212,774)</u></b>
<b>PROFIT BEFORE INCOME TAX</b>		<b><u>1,401,251</u></b>	<b><u>1,309,824</u></b>
Income tax expense	35.	(254,926)	(253,440)
<b>PROFIT AFTER INCOME TAX FOR THE PERIOD FROM CONTINUING OPERATIONS</b>		<b><u>1,146,325</u></b>	<b><u>1,056,384</u></b>

**OTP BANK PLC**  
**CONSOLIDATED STATEMENT OF PROFIT OR LOSS FOR THE YEAR**  
**ENDED 31 DECEMBER 2025 [continued]**  
**(in HUF mn)**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>PROFIT AFTER INCOME TAX FOR THE PERIOD</b>			
<b>FROM CONTINUING OPERATIONS</b>		<b><u>1,146,325</u></b>	<b><u>1,056,384</u></b>
<b>DISCONTINUED OPERATIONS</b>			
Net Gain from discontinued operations	49.	-	19,756
<b>PROFIT AFTER INCOME TAX FROM CONTINUING AND DISCONTINUED OPERATION</b>		<b><u>1,146,325</u></b>	<b><u>1,076,140</u></b>
<b>From this, attributable to:</b>			
<b>Non-controlling interest</b>	29.	<u>5,627</u>	<u>4,227</u>
<b>Owners of the Company</b>		<b><u>1,140,698</u></b>	<b><u>1,071,913</u></b>
<b>Earnings per share (in HUF)</b>			
<b>From continuing operations</b>			
Basic	45.	4,435	3,977
Diluted	45.	4,434	3,976
<b>From continuing and discontinued operations</b>			
Basic	45.	4,435	4,052
Diluted	45.	4,434	4,050

**OTP BANK PLC**  
**CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME FOR THE**  
**YEAR ENDED 31 DECEMBER 2025**  
**(in HUF mn)**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>PROFIT AFTER INCOME TAX FOR THE YEAR</b>		<b><u>1,146,325</u></b>	<b><u>1,076,140</u></b>
<b>Items that may be reclassified subsequently to profit or loss:</b>			
Fair value adjustment of securities at fair value through other comprehensive income	27.	7,991	37,528
Deferred tax related to fair value adjustment of securities at fair value through other comprehensive income	27.	(811)	(4,181)
Net investment hedge in foreign operations	27.	24,690	(27,310)
Foreign currency translation difference	27.	(215,803)	195,152
<b>Items that will not be reclassified subsequently to profit or loss:</b>			
Fair value changes of equity instruments at fair value through other comprehensive income	27.	154	16,519
Deferred tax related to equity instruments at fair value through other comprehensive income	27.	(211)	(2,115)
Change of actuarial gain related to employee benefits	27.	(323)	(949)
Deferred tax related to change of actuarial gain related to employee benefits	27.	<u>24</u>	<u>26</u>
<b>Other comprehensive income</b>		<b><u>(184,289)</u></b>	<b><u>214,670</u></b>
<b>TOTAL COMPREHENSIVE INCOME</b>		<b><u>962,036</u></b>	<b><u>1,290,810</u></b>
<b>From this, attributable to:</b>			
<b>Non-controlling interest</b>		<b><u>5,784</u></b>	<b><u>4,713</u></b>
<b>Owners of the Company</b>		<b><u>956,252</u></b>	<b><u>1,286,097</u></b>

**OTP BANK PLC**  
**CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2025**  
(in HUF mn)

	Note	Share capital	Capital reserve	Retained earnings and other reserves <sup>1</sup>	Treasury shares	Total equity attributable to shareholders	Non-controlling interest	Total equity
<b>Balance as at 1 January 2024</b>		<b><u>28,000</u></b>	<b><u>52</u></b>	<b><u>4,179,270</u></b>	<b><u>(120,489)</u></b>	<b><u>4,086,833</u></b>	<b><u>7,960</u></b>	<b><u>4,094,793</u></b>
Profit after income tax for the period		-	-	1,071,913	-	1,071,913	4,227	1,076,140
Other Comprehensive Income		-	-	214,184	-	214,184	486	214,670
<b>Total comprehensive income</b>		<b>-</b>	<b>-</b>	<b><u>1,286,097</u></b>	<b>-</b>	<b><u>1,286,097</u></b>	<b><u>4,713</u></b>	<b><u>1,290,810</u></b>
Purchasing of non-controlling interest		-	-	-	-	-	(350)	(350)
Dividend paid to non-controlling interest		-	-	-	-	-	(2,643)	(2,643)
Share-based payment	40.	-	-	4,411	-	4,411	-	4,411
Paid dividends for years 2023	27.	-	-	(150,000)	-	(150,000)	-	(150,000)
Adjustment related to share-based payment		-	-	6,928	-	6,928	-	6,928
Other transfer		-	-	177	-	177	-	177
Sale of Treasury shares	28.	-	-	-	28,275	28,275	-	28,275
Treasury shares - loss on sale	28.	-	-	717	-	717	-	717
Treasury shares - acquisition	28.	-	-	-	(153,105)	(153,105)	-	(153,105)
<b>Balance as at 31 December 2024</b>		<b><u>28,000</u></b>	<b><u>52</u></b>	<b><u>5,327,600</u></b>	<b><u>(245,319)</u></b>	<b><u>5,110,333</u></b>	<b><u>9,680</u></b>	<b><u>5,120,013</u></b>
	Note	Share capital	Capital reserve	Retained earnings and other reserves <sup>1</sup>	Treasury shares	Total equity attributable to shareholders	Non-controlling interest	Total equity
<b>Balance as at 1 January 2025</b>		<b><u>28,000</u></b>	<b><u>52</u></b>	<b><u>5,327,600</u></b>	<b><u>(245,319)</u></b>	<b><u>5,110,333</u></b>	<b><u>9,680</u></b>	<b><u>5,120,013</u></b>
Profit after income tax for the period		-	-	1,140,698	-	1,140,698	5,627	1,146,325
Other Comprehensive Income		-	-	(184,446)	-	(184,446)	157	(184,289)
<b>Total comprehensive income</b>		<b>-</b>	<b>-</b>	<b><u>956,252</u></b>	<b>-</b>	<b><u>956,252</u></b>	<b><u>5,784</u></b>	<b><u>962,036</u></b>
Purchasing of non-controlling interest		-	-	-	-	-	(72)	(72)
Increase due to business combination		-	-	-	-	-	2,538	2,538
Dividend paid to non-controlling interest	29.	-	-	-	-	-	(2,252)	(2,252)
Share-based payment	40.	-	-	5,391	-	5,391	-	5,391
Paid dividends for year 2024	27.	-	-	(270,000)	-	(270,000)	-	(270,000)
Adjustment related to share-based payment		-	-	13,988	-	13,988	-	13,988
Sale of Treasury shares	28.	-	-	-	36,426	36,426	-	36,426
Treasury shares - loss on sale	28.	-	-	7,292	-	7,292	-	7,292
Treasury shares - acquisition	28.	-	-	-	(249,744)	(249,744)	-	(249,744)
<b>Balance as at 31 December 2025</b>		<b><u>28,000</u></b>	<b><u>52</u></b>	<b><u>6,040,523</u></b>	<b><u>(458,637)</u></b>	<b><u>5,609,938</u></b>	<b><u>15,678</u></b>	<b><u>5,625,616</u></b>

<sup>1</sup> See details in Note 27.

**OTP BANK PLC**  
**CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR**  
**ENDED 31 DECEMBER 2025**  
**(in HUF mn)**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>OPERATING ACTIVITIES</b>			
<b>Profit after income tax for the period</b>			
<b>(attributable to the owners of The company)</b>		<b><u>1,140,698</u></b>	<b><u>1,071,913</u></b>
Net accrued interest		(25,899)	(14,406)
Dividend income	27.	(21,443)	(12,970)
Depreciation and amortization	13.	160,793	140,720
Goodwill impairment	13.	674	-
(Release of loss allowance) / Loss allowance on securities	9.,10.	(7,417)	39,907
Loss allowance on loans and placements, amounts due from banks and on repo receivables	5-7., 11.	163,388	84,816
(Release of loss allowance) / Loss allowance on investments	12.	(386)	957
Loss allowance / (Release of loss allowance) on investment properties	14.	3,726	(23)
Impairment on tangible and intangible assets	13.	5,633	7,335
Loss allowance on other assets	16.	17,458	13,166
Provision on off-balance sheet commitments and contingent liabilities	24.	34,996	7,439
Share-based payment	40.	5,391	4,411
Unrealized loss / (gain) on fair value change of financial instrument at fair value through profit or loss	33.	3,527	(34,047)
Non-realized foreign exchange loss / (gain)	33.	18,434	(59,696)
Loss / (Gain) from sale of tangible and intangible assets	13.	2,801	(2,757)
Unrealized loss / (gain) on fair value change of derivative financial instruments	33.	18,364	(85,178)
Gain on discontinued operations	49.	-	(19,756)
<b>Net changes in assets and liabilities in operating activities</b>			
Net decrease / (increase) in securities at fair value through profit or loss	8.	241,215	(463,443)
Net decrease / (increase) in compulsory reserves at the National Banks	5.	136,620	(140,326)
Increase in placement with other banks, before loss allowance for placements	6.	(44,131)	(446,637)
Net increase in loans at amortized cost before loss allowance for loans and in loans at fair value	11.	(2,745,525)	(2,082,949)
Net increase in other assets before loss allowance	16.	(52,714)	(97,341)
Net (decrease) / increase in amounts due to banks, the National Governments, deposits from the National Banks and other banks and repo liabilities	17., 18.	(429,559)	147,032
Net increase in financial liabilities designated at fair value through profit or loss	19.	18,345	3,100
Net increase in deposits from customers	20.	2,207,908	2,459,297
Cash payments for the interest portion of the lease liability	36.	(4,053)	(3,557)
Net (decrease) / increase in other liabilities	24.	(49,651)	333,844
Income tax paid	35.	<u>(285,853)</u>	<u>(94,574)</u>
<b>Net Cash Provided by Operating Activities</b>		<b><u>513,340</u></b>	<b><u>756,277</u></b>

**OTP BANK PLC**  
**CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR**  
**ENDED 31 DECEMBER 2025**  
**(in HUF mn)**  
**[continued]**

	Note	Year ended 31 December 2025	Year ended 31 December 2024
<b>INVESTING ACTIVITIES</b>			
Purchase of securities at fair value			
through other comprehensive income	9.	(1,448,736)	(733,477)
Proceeds from sale of securities at fair value			
through other comprehensive income	9.	1,125,313	678,896
Purchase of investments	12.	(30,305)	(29,212)
Proceeds from sale of investments	12.	-	51
Dividends received	27.	16,239	13,016
Purchase of securities at amortized cost	10.	(83,758,298)	(141,884,521)
Redemption of securities at amortized cost	10.	83,212,249	139,854,176
Purchase of property, equipment and intangible assets	13.	(387,187)	(304,156)
Proceeds from disposals of property, equipment and intangible assets	13.	188,482	68,971
Purchase of investment properties	14.	(15,287)	(32,106)
Proceeds from sale of investment properties	14.	5,350	1,097
Net change in cash and cash equivalents from discontinued operation	49.	-	(142,975)
<b>Net Cash Used in Investing Activities</b>		<b><u>(1,092,180)</u></b>	<b><u>(2,510,240)</u></b>
<b>FINANCING ACTIVITIES</b>			
Cash received from issuance of securities	21.	776,794	1,058,432
Cash used for redemption of issued securities	21.	(690,196)	(456,930)
Cash payments for the principal portion of the lease liability	36.	(13,418)	(12,462)
Cash received from issuance of subordinated bonds and loans	25.	293,051	-
Cash used for redemption of subordinated bonds and loans	25.	(86,261)	(148,502)
Sale of Treasury shares	28.	43,719	28,991
Purchase of Treasury shares	28.	(249,744)	(153,105)
Dividends paid	27.	(255,916)	(143,038)
<b>Net Cash (Used in) / Provided by Financing Activities</b>		<b><u>(181,971)</u></b>	<b><u>173,386</u></b>
<b>TOTAL NET CASH USED IN</b>		<b><u>(760,811)</u></b>	<b><u>(1,580,577)</u></b>
<b>Cash and cash equivalents</b>			
<b>at the beginning of the period</b>	5.	<b>3,517,287</b>	<b>4,859,342</b>
Foreign currency translation		(215,946)	194,627
Net change in cash and cash equivalent		(760,811)	(1,580,577)
Adjustment due to discontinued operation		-	43,895
<b>Cash and cash equivalents</b>			
<b>at the end of the period</b>	5.	<b><u>2,540,530</u></b>	<b><u>3,517,287</u></b>

**NOTE 1: ORGANIZATION AND BASIS OF CONSOLIDATED FINANCIAL STATEMENTS****1.1. General information**

OTP Bank Plc (the “Bank” or “OTP Bank” or the “Company”) was established on 31 December 1990, when the previously State-owned company was transformed into a limited liability company. The Bank’s registered office address is 16, Nador Street, Budapest 1051, Hungary.

Due to Hungarian legislation audit services are a statutory requirement for OTP Bank. Disclosure information about the auditor: Ernst & Young Audit Ltd. (001165), 1132 Budapest Váci Street 20. Registered under 01-09-267553 by Budapest-Capital Regional Court, as registry court. Statutory registered auditor: Zsolt Kónya, registration number: 007383.

These Consolidated Financial Statements were approved by the Board of Directors and authorised for issue on 17 March 2026. The Bank’s owners have the power to amend the Consolidated Financial Statements after issue if applicable.

In 1995, the shares of the Bank were introduced on the Budapest and the Luxembourg Stock Exchanges and were also traded on the SEAQ board on the London Stock Exchange and on PORTAL in the USA.

The structure of the Share capital by shareholders (%):

	<b>31/12/2025</b>	<b>31/12/2024</b>
Domestic and foreign private and institutional investors	94.19%	96.77%
Employees	0.50%	0.51%
Treasury shares	5.15%	2.52%
Other	<u>0.16%</u>	<u>0.20%</u>
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

The Bank’s Registered Capital consists of 280.000.010 pieces of ordinary shares with the nominal value of HUF 100 each, representing the same rights to the shareholders.

The Bank and its subsidiaries (“Entities of the Group“, together the “Group” or “OTP Group”) provide a full range of commercial banking services through a wide network of 1,196 branches in the following countries Hungary, Bulgaria, Serbia, Croatia, Russia, Ukraine, Albania, Montenegro, Moldova, Slovenia and Uzbekistan, as well as provides other services in the Netherlands and Malta.

The number of the active employees without long-term breaks, and with part-time employees taken into account proportionately, and the average number of active employees on monthly basis at the Group (with employed agents):

	<b>31/12/2025</b>	<b>31/12/2024</b>
The number of employees at the Group	40,845	40,317
The average number of employees at the Group	40,201	40,807

**NOTE 1: ORGANIZATION AND BASIS OF CONSOLIDATED FINANCIAL STATEMENTS**  
**[continued]**

**1.2. Basis of Accounting**

These Consolidated Financial Statements were prepared based on the assumptions of the Management that the Bank will remain in business for the foreseeable future and that the Bank will not be forced to halt operations and liquidate its assets in the near term at what may be very low fire-sale prices.

The Entities of the Group maintain their accounting records and prepare their statutory accounts in accordance with the commercial, banking and fiscal regulations prevailing in Hungary and in case of foreign subsidiaries in accordance with the commercial, banking and fiscal regulations of the country in which they are domiciled.

The Bank's functional currency is the Hungarian Forint ("HUF"). It is also presentation currency for the Group. The financial statements of the subsidiaries used during the preparation of Consolidated Financial Statements of the Group have the same reporting period – starting from 1 January ending as at 31 December – like the reporting period of the Group.

Due to the fact that the Bank is listed on international and national stock exchanges, the Bank is obliged to present its financial statements in accordance with International Financial Reporting Standards ("IFRS") as adopted by the European Union (the "EU").

Certain adjustments have been made to the Entities' statutory accounts in order to present the Consolidated Financial Statements of the Group in accordance with all standards and interpretations issued by the International Accounting Standards Board ("IASB") and endorsed by the EU.

The accompanying Notes to these Consolidated Financial Statements form an integral part of these Consolidated Financial Statements prepared in accordance with International Accounting Standards ("IAS") as adopted by EU.

**1.2.1. The effect of adopting new and revised International Financial Reporting Standards effective from 1 January 2025**

The following amendments to the existing standards and new interpretation issued by the International Accounting Standards Board (IASB) and adopted by the EU are effective for the current reporting period:

- **IAS 21 "The Effects of Changes in Foreign Exchange Rates" – Lack of Exchangeability (Amendments)**
  - The amendments are effective for annual reporting periods beginning on or after 1 January 2025, with earlier application permitted.
    - The amendments specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. A currency is considered to be exchangeable into another currency when an entity is able to obtain the other currency within a time frame that allows for a normal administrative delay and through a market or exchange mechanism in which an exchange transaction would create enforceable rights and obligations. If a currency is not exchangeable into another currency, an entity is required to estimate the spot exchange rate at the measurement date. An entity's objective in estimating the spot exchange rate is to reflect the rate at which an orderly exchange transaction would take place at the measurement date between market participants under prevailing economic conditions. The amendments note that an entity can use an observable exchange rate without adjustment or another estimation technique.

The adoption of this amendment to the existing standard did not lead to any material changes in these Consolidated Financial Statements.

**NOTE 1: ORGANIZATION AND BASIS OF CONSOLIDATED FINANCIAL STATEMENTS**  
**[continued]**

**1.2. Basis of Accounting [continued]**

**1.2.2. New and revised Standards and Interpretations issued by IASB and adopted by the EU but not yet effective**

- **IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures - Classification and Measurement of Financial Instruments (Amendments)** - The amendments are effective for annual reporting periods beginning on or after 1 January 2026. Early adoption of amendments related to the classification of financial assets and the related disclosures is permitted, with the option to apply the other amendments at a later date.
  - The amendments clarify that a financial liability is derecognised on the 'settlement date', when the obligation is discharged, cancelled, expired, or otherwise qualifies for derecognition. They introduce an accounting policy option to derecognise liabilities settled via electronic payment systems before the settlement date, subject to specific conditions. They also provide guidance on assessing the contractual cash flow characteristics of financial assets with environmental, social, and governance (ESG)-linked features or other similar contingent features. Additionally, they clarify the treatment of non-recourse assets and contractually linked instruments and require additional disclosures under IFRS 7 for financial assets and liabilities with contingent event references (including ESG-linked) and equity instruments classified at fair value through other comprehensive income.
- **IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures - Contracts Referencing Nature-dependent Electricity (Amendments)** - The amendments are effective for annual reporting periods beginning on or after 1 January 2026, with earlier application permitted.
  - The amendments include clarifying the application of the 'own-use' requirements, permitting hedge accounting if contracts in scope of the amendments are used as hedging instruments, and introduce new disclosure requirements to enable investors to understand the impact of these contracts on a company's financial performance and cash flows. The clarifications regarding the 'own-use' requirements must be applied retrospectively, but the guidance permitting hedge accounting have to be applied prospectively to new hedging relationships designated on or after the date of initial application.
- **Annual Improvements to IFRS Accounting Standards – Volume 11** - An entity shall apply those amendments for annual reporting periods beginning on or after 1 January 2026.
  - The IASB's annual improvements process deals with non-urgent, but necessary, clarifications and amendments to IFRS. In July 2024, the IASB issued Annual Improvements to IFRS Accounting Standards — Volume 11. The Annual Improvements to IFRS Accounting Standards - Volume 11, includes amendments to IFRS 1, IFRS 7, IFRS 9, IFRS 10, and IAS 7. These amendments aim to clarify wording, correct minor unintended consequences, oversights, or conflicts between requirements in the standards.
- **IFRS 18 Presentation and Disclosure in Financial Statements** - IFRS 18 is effective for reporting periods beginning on or after 1 January 2027, with earlier application permitted. Retrospective application is required in both annual and interim financial statements.
  - IFRS 18 introduces new requirements on presentation within the statement of profit or loss. It requires an entity to classify all income and expenses within its statement of profit or loss into one of the five categories: operating; investing; financing; income taxes; and discontinued operations. These categories are complemented by the requirements to present subtotals and totals for 'operating profit or loss', 'profit or loss before financing and income taxes' and 'profit or loss'. It also requires disclosure of management-defined performance measures and includes new requirements for aggregation and disaggregation of financial information based on the identified 'roles' of the primary financial statements and the notes. In addition, there are consequential amendments to other accounting standards.

The Group has initiated its IFRS 18 implementation project following the issuance of the new standard, which becomes effective for annual reporting periods beginning on or after 1 January 2027. Work is currently ongoing to assess and align internal reporting structures with the revised presentation and disclosure requirements, including the introduction of management-defined performance measures (MPMs). Based on the assessments performed to date, the Group does not expect IFRS 18 to have a material impact on its consolidated statement of profit or loss, although the structure and presentation of certain line items may be updated to reflect the new categorisation and subtotals required by the standard.

**NOTE 1: ORGANIZATION AND BASIS OF CONSOLIDATED FINANCIAL STATEMENTS**  
[continued]

**1.2. Basis of Accounting [continued]**

**1.2.2. New and Revised Standards and Interpretations issued by IASB and adopted by the EU but not yet effective [continued]**

In particular, three items are expected to fall outside the operating profit category: profit from associates, profit on investment properties and operating leases and the expense on lease liabilities. In addition, the Group is in the process of developing a new note to the consolidated financial statements that will present and explain its MPMs in accordance with IFRS 18.

The Group anticipates that the adoption of these new standards, amendments to the existing Standards and new interpretations will have no significant impact on the Consolidated Financial Statements of the Group in the period of initial application.

**1.2.3. Standards and Interpretations issued by IASB, but not yet adopted by the EU**

At present, IFRS as adopted by the EU do not significantly differ from regulations adopted by the International Accounting Standards Board (IASB) except for the following new standards, amendments to the existing standards and new interpretation, which were not endorsed for use in EU as at the date of publication of these Consolidated Financial Statements:

- **IFRS 19 Subsidiaries without Public Accountability: Disclosures (including the amendments)** - IFRS 19 (including the amendments) is effective for reporting periods beginning on or after 1 January 2027, with early application permitted.
  - IFRS 19 permits subsidiaries without public accountability to use reduced disclosure requirements if their parent company (either ultimate or intermediate) prepares publicly available consolidated financial statements in compliance with IFRS accounting standards. These subsidiaries must still apply the recognition, measurement and presentation requirements in other IFRS accounting standards. Unless otherwise specified, eligible entities that elect to apply IFRS 19 will not need to apply the disclosure requirements in other IFRS accounting standards. The amendments issued in August 2025 reduce the disclosure requirements of new IFRS accounting standards, which had been included in full when IFRS 19 was first issued.
- **Amendment in IFRS 10 Consolidated Financial Statements and IAS 28 Investments in Associates and Joint Ventures: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture** - In December 2015 the IASB postponed the effective date of this amendment indefinitely pending the outcome of its research project on the equity method of accounting.
  - The amendments address an acknowledged inconsistency between the requirements in IFRS 10 and those in IAS 28, in dealing with the sale or contribution of assets between an investor and its associate or joint venture. The main consequence of the amendments is that a full gain or loss is recognized when a transaction involves a business (whether it is housed in a subsidiary or not). A partial gain or loss is recognized when a transaction involves assets that do not constitute a business, even if these assets are housed in a subsidiary.
- **IAS 21 The Effects of Changes in Foreign Exchange Rates: Translation to a Hyperinflationary Presentation Currency (Amendments)** - The amendments are effective for annual reporting periods beginning on or after 1 January 2027, with earlier application permitted.
  - The amendments require translation from a non-hyperinflationary functional currency into a hyperinflationary presentation currency at the closing rate. If an entity's functional currency is the currency of a non-hyperinflationary economy, but its presentation currency is the currency of a hyperinflationary economy, its results and financial position are translated into the presentation currency by translating all amounts (i.e., assets, liabilities, equity items, income and expenses) and all comparatives at the closing rate at the date of the most recent statement of financial position. An entity whose functional currency and presentation currency are the currency of a hyperinflationary economy, restates the comparative amounts of a foreign operation, whose functional currency is that of a non-hyperinflationary economy, by applying the general price index, to the foreign operation's comparative figures. The amendments also introduce certain additional disclosure requirements.

The Group anticipates that the adoption of these new standards, amendments to the existing Standards and new interpretations will have no significant impact on the Consolidated Financial Statements of the Group in the period of initial application.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES**

Material accounting policies applied in the preparation of the accompanying Consolidated Financial Statements are summarized below:

**2.1. Basis of Presentation**

These Consolidated Financial Statements have been prepared under the historical cost convention with the exception of certain financial instruments, which are recorded at fair value. Revenues and expenses are recorded in the period in which they are earned or incurred. The Group does not offset assets and liabilities or income and expenses unless it is required or permitted by an IFRS standard.

During the preparation of Consolidated Financial Statements assets and liabilities, income and expenses are presented separately, except in certain cases, when one of the IFRS standards prescribes net presenting related to certain items (see note 2.5.5. below).

The presentation of Consolidated Financial Statements in conformity with IFRS as adopted by the EU requires the Management of the Group to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities as of the date of the financial statements and their reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Future changes in economic conditions, business strategies, regulatory requirements, accounting rules and other factors could result in a change in estimates that could have a material impact on future financial statements.

**2.2. Foreign currency translation**

In preparing the financial statements of each individual group entity, transactions in currencies other than the entity's functional currencies are translated into functional currencies at the rates of exchange prevailing at the dates of the transactions. At the end of each reporting period, monetary items denominated in foreign currencies are retranslated at the exchange rates quoted by the National Bank of Hungary ("NBH"), or if there is no official rate, at exchange rates quoted by OTP Bank as at the date of the Consolidated Financial Statements.

Non-monetary items carried at fair value that are denominated in foreign currencies are retranslated at the rates prevailing at the date when the fair value was determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated.

Exchange differences on monetary items are recognized in profit or loss in the period in which they arise except for:

- exchange differences on foreign currency borrowings relating to assets under construction for future productive use, which are included in the cost of those assets when they are regarded as an adjustment to interest costs on those foreign currency borrowings;
- exchange differences on transactions entered into in order to hedge certain foreign currency risks (see note 2.5.4. below for hedging accounting policies); and
- exchange differences on monetary items receivable from or payable to a foreign operation for which settlement is neither planned nor likely to occur (therefore forming part of the net investment in the foreign operation), which are recognized initially in Other Comprehensive Income and reclassified from equity to profit or loss on repayment of the monetary items.

For the purposes of presenting Consolidated Financial Statements, the assets and liabilities of the Group's foreign operations are translated into HUF using exchange rates prevailing at the end of each reporting period. Income and expense items are translated at the average exchange rates for the period, unless exchange rates fluctuate significantly during that period, in which case the exchange rates at the dates of the transactions are used. Exchange differences arising, if any, are recognized in Other Comprehensive Income and accumulated in equity (attributed to non-controlling interests as appropriate).

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.2. Foreign currency translation [continued]**

On the disposal of a foreign operation (i.e. a disposal of the Group's entire interest in a foreign operation, or a disposal involving loss of control over a subsidiary that includes a foreign operation, a disposal involving loss of joint control over a jointly controlled entity that includes a foreign operation, or a disposal involving loss of significant influence over an associate that includes a foreign operation), all of the exchange differences accumulated in equity in respect of that operation attributable to the owners of the Group are reclassified to profit or loss.

In addition, in relation to a partial disposal of a subsidiary that does not result in the Group losing control over the subsidiary, the proportionate share of accumulated exchange differences are re-attributed to non-controlling interests and are not recognized in profit or loss.

Goodwill and fair value adjustments on identifiable assets and liabilities acquired arising on the acquisition of a foreign operation are treated as assets and liabilities of the foreign operation and translated at the rate of exchange prevailing at the end of each reporting period. Exchange differences arising are recognized in Other Comprehensive Income and accumulated in equity.

**2.3. Principles of consolidation**

As the ultimate parent, OTP Bank is preparing Consolidated Financial Statements of the Group.

These Consolidated Financial Statements combine the assets, liabilities, equity, income, expenses and cash flows of the Bank and of those subsidiaries of the Bank in which the Bank exercises control.

All intra-group transactions are consolidated fully on a line-by-line basis while under equity method other consolidation rules are applied. Determination of the entities which are involved into the consolidation procedures based on the determination of the Group's Control over another entity. Control exists when the Bank has power over the investee, is able to use this power and is exposed or has right to variable returns. Consolidation of a subsidiary should begin from the date when the Group obtains control and cease when the Group loses control. Therefore, income and expenses of a subsidiary should be included in the Consolidated Financial Statements from the date the Group gains control of the subsidiary until the date when the Group ceases to have control of the subsidiary.

The list of the major fully consolidated subsidiaries, the percentage of issued capital owned by the Bank and the description of their activities is provided in Note 42.

**2.4. Accounting for acquisitions**

Business combinations are accounted for using the acquisition method. Any goodwill arising on acquisition is recognized in the Consolidated Statement of Financial Position and accounted for as indicated below.

The acquisition date is the date on which the acquirer effectively obtains control over the acquiree. Before this date, it should be presented as Advance for investments within Other assets.

Goodwill, which represents the residual cost of the acquisition after obtaining the control over the acquiree in the fair value of the identifiable assets acquired and liabilities assumed is held as an intangible asset and recorded at cost less any accumulated impairment losses in the Consolidated Financial Statements. The Group tests goodwill for impairment by comparing its recoverable amount with its carrying amount, and recognising any excess of the carrying amount over the recoverable amount an impairment loss. The recoverable amount of goodwill is the higher of its fair value less costs of disposal and its value in use.

If the Group loses control of a subsidiary, derecognizes the assets (including any goodwill) and liabilities of the subsidiary at their carrying amounts at the date when control is lost and recognizes any difference as a gain or loss on the sale attributable to the parent in the Consolidated Statement of Profit or Loss on Net income from discontinued operations.

Goodwill acquired in a business combination is tested for impairment annually or more frequently if events or changes in circumstances indicate. The goodwill is allocated to the cash-generating units that are expected to benefit from the synergies of the combinations.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.4. Accounting for acquisition [continued]**

The Group calculates the fair value of identified assets and liabilities assumed on discounted cash flow model. The 3 year period explicit cash flow model serves as a basis for the impairment test by which the Group defines the impairment need on goodwill based on the strategic factors and financial data of its cash-generating units.

The Group, in its strategic plan, has taken into consideration the effects of the present global economic situation, the present economic growth and outlook, the associated risks and their possible effect on the financial sector as well as the current and expected availability of wholesale funding.

Negative goodwill (gain from bargain purchase), when the interest of the acquirer in the net fair value of the acquired identifiable net assets exceeds the cost of the business combination, is recognized immediately in the Consolidated Statement of Profit or Loss as “Other income”.

The Group measures non-controlling interests that are present ownership interests and entitle their holders to a proportionate share of the subsidiaries’ net assets in the event of liquidation at cost and are disclosed among equity. In case of equity investments measured at fair value through profit or loss in line with IFRS 9, non-controlling interests are measured at fair value to avoid any accounting mismatch. These types of non-controlling interests are disclosed as financial liabilities designated at fair value through profit or loss.

**2.5. Financial assets****2.5.1. Business model and SPPI test**

A business model refers to how the Group manages its financial instruments in order to generate cash flows. It is determined at a level that reflects how groups of financial instruments are managed rather than at an instrument level.

The financial assets held by the Group are classified into three categories depending on the business model within the financial assets are managed.

- Business model whose objective is to hold financial assets in order to collect contractual cash flows. Some sales can be consistent with hold to collect business model and the Group assesses the nature, frequency and significance of any sales occurring. The Group does not consider the sale frequent when at least six months have elapsed between sales. The significant sales are those when the sales exceed 2% of the total hold to collect portfolio. Within this business model the Group manages mainly loans and advances and long-term securities and other financial assets.
- Business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. Within this business model the Group only manages securities.
- Business model whose objective is to achieve gains in a short-term period. Within this business model the Group manages securities and derivative financial instrument.

If cash flows are realised in a way that is different from the expectations at the date that the Bank/Group assessed the business model, that does not give rise to a prior error in the Group’s financial statements nor does it change the classification of the remaining financial assets held in that business model.

When, and only when the Group changes its business model for managing financial assets it reclassifies all affected assets. Such changes are determined by the Group’s senior management as a result of external or internal changes and must be significant to the Group’s operations and demonstrable to external parties. The Group shall not reclassify any financial liability.

Classification of a financial asset is based on the characteristics of its contractual cash flows if the financial asset is held within a business model whose objective is to hold assets to collect contractual cash flows or within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets. The Group should determine whether the asset’s contractual cash flows are solely payments of principal and interest on the principal amount outstanding (SPPI test). Contractual cash flows that are solely payments of principal and interest on the principal amount outstanding are consistent with a basic lending arrangement.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.1. Business model and SPPI test [continued]**

Contractual terms that introduce exposure to risks or volatility in the contractual cash flows that is unrelated to a basic lending arrangement, such as exposure to changes in equity prices or commodity prices, do not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding. The Group assesses whether contractual cash flows are solely payments of principal and interest on the principal amount outstanding for the currency in which the financial asset is denominated.

The time value of money is the element of interest that provides consideration for only the passage of time. However, in some cases, the time value of money element may be modified. In such cases, the Group assesses the modification to determine whether the contractual cash flows represent solely payments of principal and interest on the principal amount outstanding.

When assessing a modified time value of money element, the objective is to determine how different the undiscounted contractual cash flows could be from undiscounted cash flows that would arise if the time value of money element was not modified (the benchmark cash flows). The benchmark instrument can be an actual or a hypothetical financial asset. If the undiscounted contractual cash flows significantly – above 2% – differ from the undiscounted benchmark cash flows, the financial asset should be subsequently measured at fair value through profit or loss.

**2.5.2. Securities at amortized cost**

The Group measures at amortized cost those securities which are held for contractual cash collecting purposes, and contractual terms of these securities give rise to cash flows that are solely payment of principal and interest on the principal amount outstanding. The Group initially recognizes these securities at fair value. Securities at amortized cost are subsequently measured using the effective interest (“EIR”) method and are subject to impairment. The amortisation of any discount or premium on the acquisition of a security at amortized cost is part of the amortized cost and is recognized as interest income so that the revenue recognized in each period represents a constant yield on the investment. Securities at amortized cost are accounted for on a trade date basis.

Such securities comprise mainly securities issued by the Hungarian and foreign Governments, corporate bonds, mortgage bonds, interest-bearing and discounted treasury bills.

**2.5.3. Financial assets at fair value through profit or loss****2.5.3.1. Securities held for trading**

Investments in securities are accounted for on a trade date basis and are initially measured at fair value. Securities held for trading are measured at subsequent reporting dates at fair value, so unrealized gains and losses on held for trading securities are recognized in profit or loss and included in the Consolidated Statement of Profit or Loss for the period. The Group holds held for trading securities within the business model to obtain short-term gains, consequently realized and unrealized gains and losses are recognized in the net operating income, while interest income is recognized in income similar to interest income.

Such securities consist of equity instruments, shares in investment funds, Hungarian and foreign government bonds, corporate bonds, discounted treasury bills, mortgage bonds and other securities.

**2.5.3.2. Financial assets designated as fair value through profit or loss**

The Group may - at initial recognition - irrevocably designate a financial asset as measured at fair value through profit or loss that would otherwise be measured at fair value through other comprehensive income or at amortized cost.

The Group uses fair value designation if the classification eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases (“accounting mismatch”).

The use of the fair value designation is based only on direct decision of the management of the Group. The Group currently doesn’t apply this method.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.3. Financial assets at fair value through profit or loss [continued]****2.5.3.3. Derivative financial instruments**

In the normal course of business, the Group is a party to contracts for derivative financial instruments, which represent a low initial investment compared to the notional value of the contract and their value depends on value of underlying asset and are settled in the future. The derivative financial instruments used include interest rate forward or swap agreements and currency forward or swap agreements and options. These financial instruments are used by the Group both for trading purposes and to hedge interest rate risk and currency exposures associated with its transactions in the financial markets (it is the so-called economic hedge, accounting hedge is described later).

Derivative financial instruments are accounted for on a trade date basis and are initially measured at fair value and at subsequent reporting dates also at fair value. Fair values are obtained from quoted market prices, discounted cash flow models and option pricing models as appropriate. The Group adopts a multi curve valuation approach for calculating the net present value of future cash flows – based on different curves used for determining forward rates and used for discounting purposes. It shows the best estimation of such derivative deals that are collateralised as the Group has almost all of its open derivative transactions collateralised.

Changes in the fair value of derivative financial instruments that do not qualify for hedge accounting are recognized in profit or loss and are included in the Consolidated Statement of Profit or Loss for the period. Each derivative deal is determined as asset when fair value is positive and as liability when fair value is negative.

Certain derivative transactions, while providing effective economic hedges under the risk management policy of the Group, do not qualify for hedge accounting under the specific rules of IFRS 9 and are therefore treated as derivatives held for trading with fair value gains and losses charged directly to the Consolidated Statement of Profit or Loss.

***Foreign currency contracts***

Foreign currency contracts are agreements to exchange specific amounts of currencies at a specified rate of exchange, at a spot date (settlement occurs two days after the trade date) or at a forward date (settlement occurs more than two days after the trade date). The notional amount of these forward contracts does not represent the actual market or credit risk associated with these contracts.

Foreign currency contracts are used by the Group for risk management and trading purposes. The risk management foreign currency contracts of the Group were used to hedge the exchange rate fluctuations of loans and deposits to credit institutions denominated in foreign currency.

***Foreign exchange swaps and interest rate swaps***

The Group enters into foreign exchange swap and interest rate swap (“IRS”) transactions. The swap transaction is an agreement concerning the swap of certain financial instruments, which usually consists of spot and one or more forward contracts.

IRS transactions oblige two parties to exchange one or more payments calculated with reference to fixed or periodically reset rates of interest applied to a specific notional principal amount (the base of the interest calculation). Notional principal is the amount upon which interest rates are applied to determine the payment streams under IRS transactions. Such notional principal amounts often are used to express the volume of these transactions but are not actually exchanged between the counterparties.

IRS transactions are used by the Group for risk management and trading purposes.

***Cross-currency interest rate swaps***

The Group enters into cross-currency interest rate swap (CCIRS) transactions which have special attributes, i.e. the parties exchange the notional amount at the beginning and also at the maturity of the transaction. A special type of these deals is the mark-to-market CCIRS agreements. For these kind of transactions the parties – in accordance with the foreign exchange prices – revalue the notional amount during lifetime of the transaction.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.3. Financial assets at fair value through profit or loss [continued]****2.5.3.3. Derivative financial instruments [continued]*****Equity and commodity swaps***

Equity swaps obligate two parties to exchange more payments calculated with reference to periodically reset rates of interest and performance of indices. A specific notional principal amount is the base of the interest calculation. The payment of index return is calculated on the basis of current market price compared to the previous market price. In case of commodity swaps payments are calculated on the basis of the strike price of a predefined commodity compared to its average market price in a period.

***Forward rate agreements (FRA)***

A forward rate agreement is an agreement to settle amounts at a specified future date based on the difference between an interest rate index and an agreed upon fixed rate. Market risk arises from changes in the market value of contractual positions caused by movements in interest rates.

The Group limits its exposure to market risk by entering into generally matching or offsetting positions and by establishing and monitoring limits on unmatched positions. Credit risk is managed through approval procedures that establish specific limits for individual counterparties. The Group's forward rate agreements were transacted for management of interest rate exposures and have been accounted for at mark-to-market fair value.

***Foreign exchange options***

A foreign exchange option is a derivative financial instrument that gives the owner the right to exchange money denominated in one currency into another currency at a pre-agreed exchange rate at a specified future date. The transaction, for a fee, guarantees a worst-case exchange rate for the futures purchase of one currency for another. These options protect against unfavourable currency movements while preserving the ability to participate in favourable movements.

**2.5.4. Hedge accounting**

The Group implemented hedge accounting rules for micro hedge transactions prescribed by IFRS 9 in 2018. The Group elected – as an accounting policy choice permitted under IFRS 9 – to apply IAS 39 hedge accounting rules for portfolio (macro) hedge transactions. For further details please see Note 47.3.

**2.5.4.1. Derivative financial instruments designated as fair value hedge****Micro hedge transactions**

The Group elected to apply IFRS 9 for the micro hedge transactions. Changes in the fair value of derivatives that are designated and qualify as hedging instruments in fair value hedges and that prove to be highly effective in relation to the hedged risk, are recorded in the Consolidated Statement of Profit or Loss along with the corresponding change in fair value of the hedged asset or liability that is attributable to the specific hedged risk. The ineffective element of changes in fair value of hedging instrument is charged directly to the Consolidated Statement of Profit or Loss.

The conditions of hedge accounting applied by the Group are the following: formally designated as hedge relationship, proper hedge documentation is prepared, effectiveness test is performed and based on it the hedge is qualified as effective. In the case of a financial instrument measured at amortised cost the Group recognises the hedging gain or loss on the hedged item as the modification of its carrying amount and it is recognised in profit or loss. These adjustments of the carrying amount are amortised to the profit or loss using the effective interest rate method. The Group starts the amortisation when the hedged item is no longer adjusted by the hedging gains or losses. If the hedged item is derecognised, the Group recognises the unamortised fair value in profit or loss immediately. For fair value hedges inefficiencies and the net revaluation of hedged and hedging item are recognized in the Net results on derivative instruments and hedge relationships.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.4. Hedge accounting [continued]****2.5.4.1. Derivative financial instruments designated as fair value hedge [continued]****Macro (portfolio) hedge transactions**

The Group elected, as a policy choice permitted under IFRS 9, to continue to apply hedge accounting in accordance with IAS 39 in the case of macro hedge transactions.

The Group applies macro fair value hedging to its core part sight deposit to mitigate the interest rate risk arising from the interest rate mismatch of assets with floating behaviour and the fixed rate nature of the deposit. The nature of the hedged risk is interest rate risk arising from the fixed nature and the term structure of the interest rate risk characteristics of the hedged core sight deposits.

The hedging instruments are fixed-to-floater interest rate swaps measured at fair value through profit or loss designated in a proportion defined as the declared hedging ratio.

The hedging gain or loss is recognized in accordance with IAS39 89 and 90.

The gain or loss on the hedging instrument is recognized in profit or loss, the fair value adjustment attributable to the hedged risk is presented on a separate line in the consolidated statement of financial position.

The assessment of hedge effectiveness is measured on a monthly basis. The hedging relationship is considered appropriate if the difference of fair value change of the hedging instrument and the hedged item is between the 80% -125% range in case of all or all but one valid stress scenarios.

The aggregated fair value changes on the hedged assets are recognised on the Derivative financial asset / liability designated as hedge accounting in the Consolidated Statement of financial position.

**2.5.4.2. Derivative financial instruments designated as cash flow hedge**

The Group elected to apply IFRS 9 for the micro hedge transactions.

Changes in the fair value of derivatives that are designated and qualify as hedging instrument in cash flow hedges and that prove to be highly effective in relation to the hedged risk are recognized in their effective portion as reserve in Other Comprehensive Income. The ineffective element of changes in fair value of hedging instrument is charged directly to the Consolidated Statement of Profit or Loss.

The Group terminates the hedge relationship if the hedging instrument expires or is sold, terminated or exercised, or the hedge no longer meets the criteria for hedge accounting. In the case of cash flow hedges – in line with the standard - hedge accounting is still applied by the Group as long as the underlying asset is derecognized or terminated. When the Group discontinues hedge accounting to a cash flow hedge the amount in the cash flow hedge reserve is reclassified to the profit or loss if the hedged future cash flows are no longer expected to occur. If the hedged future cash flows are still expected to occur, the amount remains in the cash flow hedge reserve and reclassified to the profit and loss only when the future cash flows occur.

**2.5.4.3. Net investment hedge in foreign operations**

The Group elected to apply IFRS 9 for the net investment hedge transactions.

Hedges of a net investment in a foreign operation, including a hedge of a monetary item that is accounted for as part of the net investment, shall be accounted for similarly to cash flow hedges.

On the disposal of a foreign operation, the cumulative value of any gains and losses recognized in Other Comprehensive Income is transferred to the Consolidated Statement of Profit or Loss.

For the purposes of presenting Consolidated Financial Statements, the assets and liabilities of the Group's foreign operations are translated into HUF using exchange rates prevailing at the end of each reporting period. Income and expense items are translated at the average exchange rates for the period, unless exchange rates fluctuate significantly during that period, in which case the exchange rates at the dates of the transactions are used. Exchange differences arising, if any, are recognized in Other Comprehensive Income and accumulated in equity. The Group does not intend to take foreign currency risks from open foreign currency position therefore the Group uses net investment hedge in foreign operations to hedge the foreign currency risk arising from the net assets of subsidiaries with EUR functional currency.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.5. Offsetting**

Financial assets and liabilities are offset and the net amount is reported in the Consolidated Statement of Financial Position when the Group has a legally enforceable right to set off the recognized amounts and the transactions are intended to be reported in the Consolidated Statement of Financial Position on a net basis. In case of the derivative financial instruments the Group applies offsetting and net presentation in the Consolidated Statement of Financial Position when the Group has the right and the ability to settle these assets and liabilities on a net basis.

**2.5.6. Embedded derivatives**

Sometimes, a derivative may be a component of a combined or hybrid contract that includes a host contract and a derivative (the embedded derivative) affecting cash flows or otherwise modifying the characteristics of the host instrument. An embedded derivative must be separated from the host instrument and accounted for as a separate derivative if, and only if:

- The economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host contract;
- A separate financial instrument with the same terms as the embedded derivative would meet the definition of a derivative as a stand-alone instrument; and
- The host instrument is not measured at fair value or is measured at fair value but changes in fair value are recognized in Other Comprehensive Income.

As long as a hybrid contract contains a host that is a financial asset the general accounting rules for classification, recognition and measurement of financial assets are applicable for the whole contract and no embedded derivative is separated.

Derivatives that are required to be separated are measured at fair value at initial recognition and subsequently. If the Group is unable to measure the embedded derivative separately either at acquisition or at the end of a subsequent financial reporting period, the Group shall designate the entire hybrid contract as at fair value through profit or loss. The Group shall assess whether an embedded derivative is required to be separated from the host contract and accounted for as a derivative when the Bank first becomes a party to the contract. The separation rules for embedded derivatives are only relevant for financial liabilities.

**2.5.7. Securities at fair value through other comprehensive income**

Securities at fair value through other comprehensive income are held within a business model whose objective is achieved by both collecting of contractual cash flows and selling securities. Furthermore, the contractual terms of these securities give rise on specified dates to cash flows that are solely payment of principal and interest on the principal amount outstanding.

**Debt instruments**

Investments in debt securities are accounted for on a trade date basis and are initially measured at fair value. Securities at fair value through other comprehensive income are measured at subsequent reporting dates at fair value. Unrealized gains and losses on securities at fair value through other comprehensive income are recognized directly in Other Comprehensive Income, except for interest and foreign exchange gains/losses on monetary items, unless such financial asset at fair value through other comprehensive income is part of an effective hedge. Such gains and losses are reported when realized in Consolidated Statement of Profit or Loss for the applicable period.

For debt securities at fair value through other comprehensive income the loss allowance is calculated based on expected credit loss model. The expected credit loss is accounted for against Other Comprehensive Income. Securities at fair value through other comprehensive income are remeasured at fair value based on quoted prices or amounts derived from cash flow models. In circumstances where the quoted market prices are not readily available, the fair value of debt securities is estimated using the present value of future cash flows and the fair value of any unquoted equity instruments are calculated using the EPS ratio.

Such securities consist of Hungarian and foreign government bonds, corporate bonds, mortgage bonds, interest-bearing Treasury bills, securities issued by the NBH and other securities.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.7. Securities at fair value through other comprehensive income [continued]****Fair value through other comprehensive income option for equity instruments**

The Group has elected to present in the Statement of Other Comprehensive Income changes of fair value of those equity instruments which are neither held for trading nor recognized as contingent consideration under IFRS 3. In some cases, the Group made an irrevocable election at initial recognition for certain equity instruments to present subsequent changes in fair value of these securities in the consolidated other comprehensive income instead of in profit or loss.

The use of the “fair value through other comprehensive income” option is based only on direct decision of management of the Group.

**2.5.8. Loans, placements with other banks, repo receivables and loss allowance for loan and placements and repo receivable losses**

The Group measures at amortized cost those Loans and placements with other banks and repo receivables, which are held to collect contractual cash flows, and contractual terms of these assets give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. These loans are recognized as Loans at amortized cost in the Consolidated Statement of Financial Position. The Group recognizes those financial assets which are not held for trading and do not give rise to contractual cash flows that are solely payments of principal and interest on the principal amount outstanding as loans measured at fair value through profit or loss. These loans are recognized as Loans mandatorily at fair value through profit or loss in the Consolidated Statement of Financial Position.

Those Loans and placements with other banks and repo receivables that are accounted at amortized cost, stated at the principal amounts outstanding (including accrued interest), net of allowance for loan or placement losses, respectively.

In case of the above mentioned financial assets measured at amortised cost transaction fees and charges adjust the carrying amount at initial recognition and are included in effective interest calculation. In case of loans at fair value through profit or loss fees and charges are recognised when incurred in the Consolidated Statement of Profit or Loss.

Loans and placements with other banks and repo receivables are derecognized when the contractual rights to the cash flows expire or they are transferred. When a financial asset is derecognized the difference of the carrying amount and the consideration received is recognized in the profit or loss in case of financial assets at amortised cost the gains or losses from derecognition are presented in “Gains/losses from derecognition of financial assets at amortised cost” line while in case of loans at fair value through profit or loss the gains or losses from derecognition are presented in “Net operating income”.

Change in the fair value of loans at fair value through profit or loss is broken down into two components and presented in the Consolidated Statement of Profit or Loss as follows:

- Portion of the change in fair value arising from changes in credit risk are presented within “Risk cost” as “Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss”.
- The remaining component of the change is presented in fair value within “Net operating income” as “Fair value adjustment on financial instruments measured at fair value through profit or loss”.

Initially financial assets shall be recognized at fair value which is usually equal to transaction value in case of loans and placements. However, when the amounts are not equal, the initial fair value difference should be recognized.

If the fair value of financial assets is based on a valuation technique using only inputs observable in market transactions, the Group recognizes the initial fair value difference in the Consolidated Statement of Profit or Loss. When the fair value of financial assets is based on models for which inputs are not observable, the difference between the transaction price and the fair value is deferred and only recognized in profit or loss when the instrument is derecognized or the inputs became observable.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.8. Loans, placements with other banks, repo receivables and loss allowance for loan and placements and repo receivable losses [continued]**

Initial fair value of loans lent at interest below market conditions is lower than their transaction price, the subsequent measurement of these loans is under IFRS 9.

The Group recognizes a loss allowance for expected credit losses on a financial asset at each reporting date. The loss allowance for a financial asset equals to 12-month expected credit loss or equals to the lifetime expected credit losses. The maximum period over which expected credit losses shall be measured is the maximum contractual period over which the Group is exposed to credit risk.

If the credit risk on a financial asset has not increased significantly since initial recognition then 12-month expected credit losses, otherwise (in case of significant credit risk increase) lifetime expected credit losses should be calculated. The expected credit loss is the present value of the difference between the contractual cash flows that are due to the Group under the contract and the cash flows that the Group expects to receive.

When the contractual cash flows of a financial asset are modified and the modification does not result in the derecognition of the financial asset the Group recalculates the gross carrying amount of the financial asset by discounting the expected future cash flows with the original effective interest rate of the asset. The difference between the carrying amount and the present value of the expected cash flows is recognized as a modification gain or loss in the profit or loss. Interest and amortized cost are accounted using effective interest rate method.

Write-offs are generally recorded after all reasonable restructuring or collection activities have taken place and the possibility of further recovery is considered to be remote. The loan is written off against the related account "Gain / (Loss) from derecognition of financial assets at amortized cost" in the Consolidated Statement of Profit or Loss.

The Group applies partial or full write-off for loans based on the definitions and prescriptions of financial instruments in accordance with IFRS 9. If the Group has no reasonable expectations regarding a financial asset (loan) to be recovered, it will be written off partially or fully at the time of emergence.

The gross amount and loss allowance of the loans shall be written off in the same amount to the estimated maximum recovery amount while the net carrying value remains unchanged. Subsequent recoveries for loans previously written-off partially or fully, which may have been derecognized from the books with no reasonable expectations for the recovery will be booked in the Consolidated Statement of Profit or Loss on "Income from recoveries of written-off, but legally existing loan" line in Risk cost.

**2.5.9. Modified assets**

If the net present value of the contracted cash flows changes due to the modification of the contractual terms and it is not qualified as derecognition, modification gain or loss should be calculated and accounted for in the Consolidated Statement of Profit or Loss. Modification gain or loss is accounted in cases like restructuring – as defined in guidelines of the Group – prolongation, renewal with unchanged terms, renewal with shorter terms and prescribing capital repayment rate, if it doesn't exist or has not been earlier.

The changes of net present value should be calculated on portfolio level in case of retail exposures. Each retail contract is restructured based on restructuring frameworks. The Group has to evaluate these frameworks (and not individual contracts). The changes of net present value should be calculated individually on contract level in case of corporate portfolio.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.5. Financial assets [continued]****2.5.9. Modified assets [continued]**

Among the possible contract amendments, the Group considers as a derecognition and a new recognition the followings:

- merging several debts into a single debt, or one single debt splitting into several tranches,
- change of currency,
- change in counterparty,
- failing SPPI test after modification,
- interest rate change (fixed to floating or floating to fixed),

when the discounted present value – discounted at the original effective interest rate – of the cash flows under the new terms is at least 10 per cent different from the discounted present value of the remaining cash flows.

In case of derecognition and new recognition of a financial asset, the unamortized fees of the derecognized asset should be presented as Income similar to interest income. The newly recognized financial asset is initially measured at fair value and is placed in Stage 1 if the derecognized financial asset was in Stage 1 or Stage 2 portfolio. The newly recognized financial asset will be purchased or originated credit impaired financial asset (“POCI”) if the derecognized financial asset was in Stage 3 portfolio or it was POCI.

The modification gain or loss shall be calculated at each contract amendments unless they are handled as a derecognition and new recognition. In case of modification the Group recalculates the gross carrying amount of the financial asset. To do this, the new contractual cash flows should be discounted using the financial asset’s original effective interest rate (or credit-adjusted effective interest rate for POCI financial asset). Any costs or fees incurred adjust the carrying amount of the modified financial asset are amortized over the remaining term of the modified financial asset.

**2.5.10. Purchased or originated credit impaired financial assets**

Purchased or originated financial assets are credit-impaired on initial recognition. A financial asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that financial asset have occurred.

A purchased credit-impaired asset is likely to be acquired at a deep discount. In unusual circumstances, it may be possible that an entity originates a credit-impaired asset, for example, following a substantial modification of a distressed financial asset that resulted in the derecognition of the original financial asset.

In the case of POCI financial assets, interest income is always recognized by applying the credit-adjusted effective interest rate.

For POCI financial assets, in subsequent reporting periods an entity is required to recognize:

- the cumulative changes in lifetime expected credit losses since initial recognition as a loss allowance,
- the impairment gain or loss which is the amount of any change in lifetime expected credit losses.

An impairment gain is recognized (with the parallel increase of the net amortized cost of receivable) if due to the favourable changes after initial recognition the lifetime expected credit loss estimation is becoming lower than the original estimated credit losses at initial recognition.

The POCI qualification remains from initial recognition to derecognition in the Group’s books.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.6. Loss allowance**

A loss allowance for loans and placements with other banks and repo receivables is recognized by the Group based on the expected credit loss model in accordance with IFRS 9. Based on the three-stage model the recognized loss allowance equals to 12-month expected credit loss from the initial recognition. On financial assets with significantly increased credit risk or credit impaired financial assets (based on objective evidence) the recognized loss allowance is the lifetime expected credit loss.

In the case of purchased or originated credit impaired financial assets, a loss allowance is recognized in the amount of the lifetime expected credit loss since initial recognition. The impairment gain in the Consolidated Statement of Profit or Loss is recognized if lifetime expected credit loss for purchased or originated credit impaired financial assets at measurement date is less than the estimated credit loss at initial recognition.

A loss allowance for loans and placements with other banks and repo receivables represents the Management's assessment for potential losses in relation to these activities.

The default occurs when either or both of the following events have taken place:

- objective criterion meaning that the credit obligation of the client is overdue exceeding the materiality threshold for more than 90 consecutive days (90+ default DPD), or the obligor has breached the limit of the overdraft with an amount exceeding the materiality threshold for more than 90 consecutive days (90+ default DPD), or
- probability criterion meaning the probability that the obligor will be unable to pay its credit obligations in full (UTP= Unlikely to Pay). The following conditions indicate the occurrence of the probability criterion: specific credit risk adjustment, sell of credit obligation with significant loss, distressed restructuring, termination of the contract on the initiative of the Bank, Bankruptcy, liquidation, personal bankruptcy, forced deleted status.

Previously described conditions should result in default status mandatorily. Moreover, during the individual expert-based assessment the client's default status shall be established if in the specific case the default can be justified on subjective basis. The default status should be terminated if in the last 3 months no other default criterion exists and the condition (either probability criterion or objective criterion) that resulted in the default status ceased at least 3 months ago.

The expected loss calculation should be forward looking. Available forward-looking information has to be included in the parameter estimation by using different scenarios, including forecasts of future economic conditions. The determination of probability-weighted forward-looking scenarios are based on the OTP Group's macro model. In general, there are two crisis scenarios (4-5), and three non-crisis scenarios (1-3) but the calculation of impairment should be based on at least two scenarios in the OTP Group. The macro conditioning is performed by Vasicek-model, which captures the relationship between point-in-time (PiT) and through-the-cycle (TTC) PD.

The Vasicek PD transformation can also be used to estimate the PIT PDs of the buckets. The required parameters (such as correlation coefficient and macro condition parameter) can be derived from the OTP's macro model.

In the collective provisioning methodology credit risk and the change of credit risk can be correctly captured by understanding the risk characteristics of the portfolio. At portfolio segmentation, setting the segments is a key element of the provisioning calculation and requires the extensive knowledge of the portfolio. The segmentation is expected to stay stable from month to month. The segmentation must be performed separately for each parameter, since in each case different factors may have relevance.

The estimation of one-year and lifetime probability of default (PD) of collectively assessed exposures is performed via transition matrices. The assets should be allocated to groups representing similar credit risk based on major credit risk characteristics and their capability to fulfil contractual obligations. The mandatory variables of the group level assessment procedure are payment delay, deal/client rating, the restructured flag, the default status and product type. Further segmentation is advisable in case significant differences are observed in probability of default. Transition matrices should be determined for each portfolio segment separately. The Group model handles healing (from default) rate in the PD parameter, thus the calculated probabilities should be reduced by this rate.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.6. Loss allowance [continued]**

Two different methods are applied in OTP Group for LGD parameter calculation: Retail mortgage loans and non-retail portfolios (MSE and Wholesale) that are significantly secured by mortgage: modified LGD methodology based on the Asset Quality Review (AQR) – the primary source of the recovery the collateral itself but cash recovery is also taken into account. The calculation is performed for each exposure individually based on the estimated parameters (main parameters: FSR – foreclosure success rate, SR – sales ratio, TTS – time to sale, C – cost, REC – cash recovery) and the actual value of collaterals (e.g. property, guarantee, surety, bail).

For Consumer loans and car finance: recovery based LGD methodology estimated from historical recoveries. The LGD calculation should not be automatically identified with historic actual data. The direction and degree of the shift in the factors impacting the LGD, also considering the macroeconomic effects, in addition to the anticipated developments in those, must always be analysed. The LGD – just like the PD – is not independent of the business cycles either; typically it increases in parallel with the economic downturn.

Loss allowance for loan and placements are determined at a level that provides coverage for individually identified credit losses. For loans for which it is not possible to determine the amount of the individually identified credit loss in the absence of objective evidence, a collective impairment loss is recognized. With this, the Group reduces the carrying amount of financial asset portfolios with similar credit risk characteristics to the amount expected to be recovered based on historical loss experience.

At subsequent measurement the Group recognizes an impairment gain or loss through “Impairment gain on POCI loans” in the Consolidated Statement of Profit or Loss as part of “Risk cost” line as an amount of expected credit losses or reversal which is required to adjust the loss allowance at the reporting date to the amount that is required to be recognized in accordance with IFRS 9. If the reason for the impairment no longer exist the impairment is released in the Consolidated Statement of Profit or Loss for the current period.

If a financial asset, for which previously there were no indicators of significant increase in credit risk (i.e. classified in Stage 1) is subsequently classified in Stage 2 or Stage 3 then loss allowance is adjusted to lifetime expected credit loss. If a financial asset, which was previously classified in Stage 2 or Stage 3 is subsequently classified in Stage 1 then the loss allowance is adjusted to the level of 12 month expected credit loss.

**Classification into risk classes**

According to the requirements of the IFRS9 the Group classifies the financial assets measured at amortized cost, at fair value through other comprehensive income and loan commitments and financial guarantees into the following stages:

- Stage 1 – performing financial instruments without significant increase in credit risk since initial recognition
- Stage 2 – performing financial instruments with significant increase in credit risk since initial recognition but not credit-impaired
- Stage 3 – non-performing, credit-impaired financial instruments
- POCI – purchased or originated credit impaired

In the case of trade receivables the Group applies the simplified approach and calculates only lifetime expected credit loss. The simplified approach is the following:

- for the past 3 years the average annual balance of receivables under simplified approach is calculated,
- the written-off receivables under simplified approach are determined in the past 3 years,
- historical losses are adjusted to reflect information about current conditions and reasonable forecasts of future economic conditions,
- the loss allowance ratio is the sum of the written-off amounts divided by the sum of the average balances,
- the loss allowance is multiplied by the end-of-year balance, it is the actual loss allowance on these receivables,
- loss allowance should be recalculated annually.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.6. Loss allowance [continued]****Classification into risk classes [continued]**

The Group assumes that the credit risk on a financial instrument has not increased significantly since initial recognition if the financial asset is determined to have low credit risk at the reporting date. This might occur if the financial asset has a low risk of default, the borrower has a strong capacity to meet its contractual cash flow obligations in the near term and adverse changes in economic and business conditions in the longer term may, but will not necessarily, reduce the ability of the borrower to fulfil its contractual cash flow obligations. The Group considers sovereign exposures as having low credit risk.

Stage 1: financial instruments for which the events and conditions specified in respect of Stage 2 and Stage 3 do not exist on the reporting date.

A client or loan must be qualified as default if one or both the following two conditions occur:

- The client delays more than 90 days. This is considered a hard trigger.
- There is reasonable probability that the client will not pay all of its obligation. This condition is examined on the basis of probability criteria of default.

The subject of default qualification is that exposure (on-balance and off-balance) which originates credit risk (so originated from loan commitments, risk-taking contracts).

A financial instrument shows significant increase in credit risk, and is allocated to Stage 2, if in respect of which any of the following triggers exist on the reporting date, without fulfilling any of the conditions for the allocation to the non-performing stage (Stage 3):

- the payment delay exceeds 30 days,
- it is classified as performing forborne,
- based on individual decision, its currency suffered a significant "shock" since the disbursement of the loan,
- the transaction/client rating exceeds a predefined value or falls into a determined range, or compared to the historic value it deteriorates to a predefined degree,
- in the case retail mortgage loans, the loan-to-value ratio exceeds a predefined rate,
- default on another loan of the retail client, if no cross-default exists,
- monitoring classification of corporate and municipal clients above different thresholds defined on group
  - financial difficulties at the debtor (capital adequacy, liquidity, deterioration of the instrument quality),
  - significant decrease of the liquidity or the activity on the active market of the financial instrument can be observed,
  - the rating of the client reflects high risk, but it is better than the default one,
  - significantly decrease in the value of the recovery from which the debtor would disburse the loan,
  - clients under liquidation.

A financial instrument is non-performing and it is allocated to Stage 3 when any of the following events or conditions exists on the reporting date:

- default (based on the group level default definition),
- classified as non-performing forborne (based on the group level forborne definition),
- the monitoring classification of corporate and municipal clients above different thresholds defined on group level (including but not limited to):
  - breaching of contracts,
  - significant financial difficulties of the debtor (like capital adequacy, liquidity, deterioration of the instrument quality),
  - bankruptcy, liquidation, debt settlement processes against debtor,
  - forced strike-off started against debtor,
  - termination of loan contract by the Bank,
  - occurrence of fraud event,
  - termination of the active market of the financial instrument.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.6. Loss allowance [continued]****Classification into risk classes [continued]**

If the exposure is no longer considered as credit impaired, the Group allocates this exposure to Stage 2.

When loss allowance is calculated at exposures categorized into stages the following process is needed by stages:

- Stage 1 (performing): loss allowance at an amount equal to 12-month expected credit loss should be recognized,
- Stage 2 (significant increase in credit risk): loss allowance at an amount equal to lifetime expected credit loss should be recognized,
- Stage 3 (non-performing): loss allowance at an amount equal to lifetime expected credit loss should be recognized.

For lifetime expected credit losses, an entity shall estimate the risk of a default occurring on the financial instrument during its expected life. 12-month expected credit losses are a portion of the lifetime expected credit losses and represent the lifetime cash shortfalls that will result if a default occurs in the 12 months after the reporting date (or a shorter period if the expected life of a financial instrument is less than 12 months), weighted by the probability of that default occurring.

An entity shall measure expected credit losses of a financial instrument in a way that reflects:

- an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes
- the time value of money and
- reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

**2.7. Sale and repurchase agreements, security lending**

Where debt or equity securities are sold under a commitment to repurchase them at a pre-determined price, they remain on the Consolidated Statement of Financial Position and the consideration received is recorded on Repo liabilities. Conversely, debt or equity securities purchased under a commitment to resell are not recognized in the Consolidated Statement of Financial Position and the consideration paid is recorded either in Placements with other banks or Deposits from customers. Interest is accrued based on the effective interest method evenly over the life of the repurchase agreement.

In the case of security lending transactions, the Group does not recognize or derecognize the securities because believes that the transferor retains substantially all the risks and rewards of the ownership of the securities. Only a financial liability or financial receivable is recognized for the consideration amount.

**2.8. Associates and other investments**

The control is established when the Group has the right and exposure over the variable positive yield of the investee but the same time put up with the consequences of the negative returns and the Group by its decisions is able to influence the extent of the yields.

The Group primarily considering the following factors in the process of determining the existing of the control:

- investigation of the decision-making mechanism of the entity,
- authority of the Board of Directors, Supervisory Board and General meeting based on the deed of association,
- existence of investments with preferential voting rights.

If the control can't be obviously determined, then it should be supposed that the control does not exist.

Significant influence is presumed by the Group to exist – unless the contrary case is proven – when the Group holds 20% or more of the voting power of an investee but does not have a control.

The Group considers a subsidiary significant when it is a financial institution or when the subsidiary contributes to the Groups' total balance sheet with higher amount. The Bank considers the subsidiaries as cash generating units.

Companies where the Bank has the ability to exercise significant influence are accounted for using the equity method. Subsidiaries and associated companies that were not accounted for using the equity method and other investments where the Bank does not hold a significant interest are recorded according to IFRS 9. When an investment in an associate is held indirectly through an entity that is a venture capital fund, the Group elects to measure these investments in the associate at fair value through profit or loss in accordance with IFRS 9.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.8. Associates and other investments [continued]**

Under the equity method, the investment is initially recognized at cost, and the carrying amount is adjusted subsequently for:

- the Group's share of the post-acquisition profits or losses of the investee, which are recognized in the Group's Consolidated Statement of Profit or Loss; and
- the distributions received from the investee, which reduce the carrying amount of the investment.

The Group's share of the profits or losses of the investee, or other changes in the investee's equity, is determined on the basis of its proportionate ownership interest. The Group recognizes its share of the investee's income and losses based on the percentage of the equity interest owned by the Group.

Gains and losses on the sale of investments are determined based on the specific identification of the cost of each investment.

**2.9. Property and equipment, Intangible assets**

Property and equipment and Intangible assets are measured at cost, less accumulated depreciation and amortization and impairment, if any.

Internally generated intangibles, excluding capitalized development costs, are not capitalized – the related expenditures are accounted as cost in the period in which they are incurred. Development costs are capitalized only when the technical and commercial feasibility of the asset has been clearly demonstrated, the Group has the intent and ability to complete the intangible asset and either use it or sell it and be able to demonstrate how the asset will generate future economic benefits. Amortization of these type of assets begins when development is completed, and the asset is available for use. During the period of development, the asset is tested for impairment annually.

The Group lists mainly self-developed software among internally generated intangible assets.

The depreciable amount (book value less residual value) of the non-current assets must be allocated over the useful lives.

Depreciation and amortization are computed usually by using the straight-line method over the estimated useful lives of the assets based on the following annual percentages:

	Annual percentages	Useful life period (years)
Intangible assets		
Software	5.9% - 100.0%	1 – 17
Property right	6.3% - 100.0%	1 – 16
Property	1.0% - 20.0%	5– 100
Machinery and office equipment	2.0% - 100.0%	1 – 50
Vehicle	2.9% - 50.0%	2 – 34

Depreciation and amortization on Property and equipment and Intangible assets commence on the day such assets are ready to use.

At each balance sheet date, the Group reviews the carrying value of its Property and equipment and Intangible assets to determine if there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated to determine the extent (if any) of the impairment loss.

Where it is not possible to estimate the recoverable amount of an individual asset, the Group estimates the recoverable amount of the cash-generating unit to which the asset belongs.

Where the carrying value of Property and equipment and Intangible assets is greater than the estimated recoverable amount, it is impaired immediately to the estimated recoverable amount.

The Group may conclude contracts for purchasing property, equipment and intangible assets, where the purchase price is settled in foreign currency. By entering into such agreements, firm commitment in foreign currency due on a specified future date arises at the Group.

Reducing the foreign currency risk caused by firm commitment, forward foreign currency contracts may be concluded to ensure the amount payable in foreign currency on a specified future date on one hand and to eliminate the foreign currency risk arising until settlement date of the contract on the other hand.

In the case of an effective hedge the realized profit or loss of the hedging instrument is stated as the part of the cost of the hedged asset as it has arisen until recognizing the asset.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.10. Inventories**

Inventories are measured at the lower of cost and net realisable value. The cost of inventories comprises all costs of purchase, costs of conversion and other costs incurred in bringing the inventories to their present location and condition.

The Group uses generally FIFO formulas to the measurement of inventories.

Inventories are derecognized when they are sold, unusable or destroyed. When inventories are sold, the carrying amount of those inventories are recognized as an expense in the period in which the related revenue is recognized. Repossessed assets are classified as inventories. The Group's policy is to sell repossessed assets and not to use them for its internal operations.

**2.11. Government grants and government assistance**

The Group recognises government grants only when there is a reasonable assurance that the grant will be received, and all attached conditions will be complied with.

The Group presents grants relating to assets as deferred income in the Consolidated Statement of Financial Position, which is recognized in profit or loss on a systematic basis over the useful life of the asset.

Grants related to an expense item are recorded as another operating income in those periods when the related costs were recognized.

**2.12. Financial liabilities**

The financial liabilities are presented within these lines in the Consolidated Financial Statements:

- Amount due to banks, the National Governments, deposits from the National Banks and other banks
- Repo liabilities
- Financial liabilities designated at fair value through profit or loss
- Deposits from customers
- Liabilities from issued securities
- Derivative financial liabilities held for trading
- Derivative financial liabilities designated as hedge accounting
- Other financial liabilities

At initial recognition, the Group measures financial liabilities at fair value plus or minus – in the case of a financial liability not at fair value through profit or loss – transaction costs that are directly attributable to the acquisition or issue of the financial liability.

Usually, the initial fair value of financial liabilities equals to transaction value. However, when the amounts are not equal, the initial fair value difference should be recognized.

If the fair value of financial liabilities is based on a valuation technique using only inputs observable in market transactions, the Group recognizes the initial fair value difference in the Consolidated Statement of Profit or Loss. When the fair value of financial liabilities is based on models for which inputs are not observable, the difference between the transaction price and the fair value is deferred and only recognized in profit or loss when the instrument is derecognized or the inputs became observable.

Financial liabilities at fair value through profit or loss are either financial liabilities held for trading or they are designated upon initial recognition as at fair value through profit or loss.

In connection to the derivative financial liabilities measured at fair value through profit or loss, the Group presents the amount of change in their fair value originated from the changes of market conditions and business environment.

The Group designated some financial liabilities upon initial recognition to measure at fair value through profit or loss. This classification eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases (“accounting mismatch”). The changes in fair value of these liabilities are recognized in profit or loss, except the fair value changes attributable to credit risk which are recognized among other comprehensive income.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.12. Financial liabilities [continued]**

In the case of financial liabilities measured at amortized cost fees and commissions related to the origination of the financial liability are recognized through profit or loss during the maturity of the instrument using effective interest method. In certain cases, the Group repurchases a part of financial liabilities (mainly issued securities or subordinated bonds) and the difference between the carrying amount of the financial liability and the amount paid for it is recognized in the net profit or loss for the period and included in other operating income.

**2.13. Leases****The Group as a lessor**

Leases are classified as finance leases whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases. Lease classification is made at the inception date and is reassessed only if there is a lease modification.

**Finance leases**

At the commencement date, a lessor derecognizes the assets held under a finance lease in the Consolidated Statement of Financial Position and present them as a receivable at an amount equal to the net investment in the lease. The lessor shall use the interest rate implicit in the lease to measure the net investment in the lease. Direct costs such as commissions are included in the initial measurement of the finance lease receivables.

The Group as a lessor recognizes finance income over the lease term, based on a pattern reflecting a constant periodic rate of return on the Group's net investment in the lease. The Group applies the lease payments relating to the period against the gross investment in the lease to reduce both the principal and the unearned finance income. The Group applies the derecognition and impairment requirements in IFRS 9 to the net investment in the lease (for more details, see Note 2.6.).

**Operating leases**

The Group as a lessor recognizes lease payments from operating leases as income on either a straight-line basis or another systematic basis. Costs, including depreciation, incurred in earning the lease income are recognized as an expense.

Initial direct costs incurred in obtaining an operating lease are added to the carrying amount of the underlying asset and recognized as an expense over the lease term on the same basis as the lease income.

The depreciation policy for depreciable underlying assets subject to operating leases is consistent with the Group's normal depreciation policy for similar assets. The Group accounts for a modification to an operating lease as a new lease from the effective date of the modification, considering any prepaid or accrued lease payments relating to the original lease as part of the lease payments for the new lease.

**The Group as a lessee**

The Group recognizes a right-of-use asset and a lease liability at the commencement of the lease term except for short-term leases and leases, where the underlying asset is of low value (less than USD 5,000). For these leases, the Group recognizes the lease payments as an expense on either a straight-line basis over the lease term or another systematic basis if that basis is more representative of the pattern of the lessee's benefit.

Deferred tax implication if the Group is lessee: At the inception of the lease, there is no net lease asset or liability, no tax base and, therefore, no temporary difference. Subsequently, as depreciation on the right-of-use asset initially exceeds the rate at which the debt reduces, a net liability arises resulting in a deductible temporary difference on which a deferred tax asset should be recognized if recoverable. Assuming that the lease liability is not repaid in advance, the total discounted cash outflows should equal the total rental payments deductible for income tax purposes.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.13. Leases [continued]****Right-of-use asset**

The right-of-use assets are presented separately in the Consolidated Statement of Financial Position and initially measured at cost, subsequently the Group applies the cost model and these assets are depreciated on a straight line basis from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term. If the lease transfers ownership of the underlying asset to the Group by the end of the lease term or if the cost of the right-of-use asset reflects that the Group will exercise a purchase option, the right-of-use asset are depreciated from the commencement date to the end of the useful life of the underlying asset.

**Lease liability**

At the commencement date, the lease liability is measured at the present value of the lease payments that are not paid at that date discounted by using the rate implicit in the lease, or if this cannot be determined, by using the incremental borrowing rate of the Group. Variable lease payments that do not depend on an index or a rate but e.g. on revenues or usage are recognized as an expense. The Group always separates the non-lease components of the lease contracts and accounts them as an expense. Lease payments must be included in the measurement of the lease liability without value added taxes. Non-deductible VAT is recognized as other expense.

The lease liability is remeasured in the event of a reassessment of the lease liability or lease modification

**2.14. Investment properties**

Investment properties of the Group are land, buildings, part of buildings which held (as the owner or as the lessee under a finance lease) to earn rentals or for capital appreciation or both, rather than for use in the production or supply of services or for administrative purposes or sale in the ordinary course of business. The Group measures the investment properties at cost less accumulated depreciation and impairment, if any.

The depreciable amount (book value less residual value) of the investment properties must be allocated over their useful lives. The depreciation and amortization are computed using the straight-line method over the estimated useful lives of the assets.

The Group discloses the fair value of the investment properties in Note 14 established mainly by external experts.

**2.15. Share capital**

Share capital is the capital determined in the Articles of Association and registered by the Budapest-Capital Regional Court. Share capital is the capital the Bank raised by issuing common stocks at the date the shares were issued. The amount of share capital has not changed over the current period.

**2.16. Treasury shares**

Treasury shares are shares which are purchased on the stock exchange and the over-the-counter market by the Bank and its subsidiaries and are presented in the Consolidated Statement of Financial Position at cost as a deduction from Consolidated Shareholders' Equity.

Gains and losses on the sale of treasury shares are credited or charged directly to shareholder's equity.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.17. Non-current assets held-for-sale and discontinued operations**

A discontinued operation is a component of an entity that either has been disposed of or is classified as held-for-sale. Hereinafter non-current assets classified as held-for-sale, disposal group and discontinued operations are referred to as assets in accordance with IFRS 5.

The Group classifies assets under IFRS 5 if their carrying amount will be recovered principally through a sale transaction rather than through continuing use. The Group does not account for an asset under IFRS 5 that has been temporarily taken out of use as if it had been abandoned.

The Group measures an asset under IFRS 5 at the lower of its carrying amount and fair value less costs to sell. When the sale is expected to occur beyond one year, the Group measures the costs to sell at their present value.

Any increase in the present value of the costs to sell that arises from the passage of time shall be presented in profit or loss. Immediately before the initial classification of the asset under IFRS 5, the carrying amounts of the asset (or all the assets and liabilities in the group) are measured in accordance with applicable IFRS.

The Group does not depreciate (or amortize) an asset under IFRS 5 while it is classified as asset in accordance with IFRS 5. Interest and other expenses attributable to the liabilities of the asset under IFRS 5 shall continue to be recognized.

If the Group has classified an asset under IFRS 5, but the criteria for that are no longer met, the Group ceases to classify the asset under IFRS 5. The Group measures these assets which cease to be classified as asset under IFRS 5 at the lower of:

- its carrying amount before the asset was classified as asset under IFRS 5, adjusted for any depreciation, amortisation or revaluations that would have been recognized had the asset not been classified as asset under IFRS 5, and
- its recoverable amount at the date of the subsequent decision not to sell.

The Group presents an asset classified as asset under IFRS 5 separately from other assets in the Consolidated Statement of Financial Position. The liabilities of the asset under IFRS 5 are presented separately from other liabilities in the Consolidated Statement of Financial Position. Those assets and liabilities shall not be offset and presented as a single amount. The major classes of assets and liabilities classified as held for sale or discontinued operations are separately disclosed in the Notes.

The Group presents separately any cumulative income or expense recognized in other comprehensive income relating to a non-current asset (or disposal group) classified as held for sale. Results from discontinued operations are reported separately in the Consolidated Statement of Profit or Loss as result from discontinued operations.

**2.18. Interest income and income similar to interest income and interest expense**

Interest income and expense are recognized in profit or loss in the period to which they relate, using the effective interest rate method.

For exposures categorized into Stage 1 and Stage 2 the interest income is recognized on a gross basis. For exposures categorized into Stage 3 (using effective interest rate) and for POCI (using credit-adjusted effective interest rate) the interest income is recognized on a net basis.

The time-proportional income similar to interest income of derivative financial instruments is calculated without using the effective interest method and the positive fair value adjustment of interest rate swaps are included in income similar to interest income.

Interest income of loans at fair value through profit or loss is calculated based on interest fixed in the contract and presented in "Income similar to interest income" line.

Interest from loans and deposits are accrued on a daily basis. Interest income and expense include certain transaction costs and the amortisation of any discount or premium between the initial carrying amount of an interest-bearing instrument and its amount at maturity calculated on an effective interest rate basis.

All interest income and expense recognized are arising from loans, placements with other banks, repo receivables, securities at fair value through other comprehensive income, securities at amortized cost and amounts due to banks, repo liabilities, deposits from customers, liabilities from issued securities, subordinated bonds and loans are presented under these lines of Consolidated Financial Statements.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.19. Revenue recognition**

The Group recognizes revenue from the following major sources:

- fee and commission income from financial services
- other revenue from customers.

**2.19.1. Fees and commissions**

Fees and commissions that are not involved in the amortized cost model are recognized in the Consolidated Statement of Profit or Loss on an accrual basis according to IFRS 15 Revenue from contracts with customers. These fees are related to deposits, cash withdrawals, security trading, bank card etc.

The Group earns fee and commission income from a diverse range of financial services it provides to its customers. Fee and commission income is recognised at an amount that reflects the consideration to which the Group expects to be entitled in exchange for providing the services. The performance obligations, as well as the timing of their satisfaction, are identified, and determined, at the inception of the contract. When the Group provides a service to its customers, consideration is invoiced and generally due immediately because it typically controls the services before transferring them to the customer.

The Group provides foreign exchange trading services to its customers, the profit margin achieved on these transactions is presented as Net profit from fees and commissions in the Consolidated Statement of Profit or Loss.

Performance obligations satisfied over time include asset management, deposit and account maintenance services, where the customer simultaneously receives and consumes the benefits provided by the Group's performance as the Group performs.

**The Group's fee and commission income from services where performance obligations are satisfied over time is as follows:**

**Deposit and account maintenance fees and commissions and fees related to cash withdrawal**

The Group provides a number of account management services for both retail and corporate customers in which they charge a fee. Fees related to these services can be typically account transaction fees (money transfer fees, direct debit fees, money standing order fees, etc.), internet banking fees (e.g. OTP Direct fee), account control fees (e.g. sms fee), or other fees for occasional services (account statement fees, other administration fees, etc.). Fees for ongoing account management services are charged to the customer's account on a monthly basis. The fees are commonly fixed amounts that can vary per account package and customer category. In the case of the transaction-based fees where the services include money transfer the fee is charged when the transaction takes place. The rate of the fee is typically determined in a certain % of the transaction amount. In the case of other transaction-based fees (e.g. SMS fee), the fee is settled monthly. In the case of occasional services, the Group basically charges the fees when the services are used by the customer. The fees can be fixed fees or they can be set in %. The rates are reviewed by the Group regularly.

These fees for ongoing account management services are charged on a monthly basis during the period when they are provided. Transaction-based fees are charged when the transaction takes place or charged monthly at the end of the month.

**Fees and commission related to the issued bank cards**

The Group provides a variety of bank cards to its customers, for which different fees are charged. The fees are basically charged in connection with the issuance of cards and the related card transactions. The annual fees of the cards are charged in advance in a fixed amount. The amount of the annual card fee depends on the type of card. In case of transaction-based fees (e.g. cash withdrawal/payment fee, merchant fee, interchange fee, etc.), the settlement of the fees will take place immediately after the transaction or on a monthly basis. The fee is typically determined in % of the transaction with a fixed minimum amount. For all other cases where the Group provides a continuous service to the customers (e.g. card closing fee), the fees are charged monthly. The fee is calculated in a fixed amount. The rates are reviewed by the Group regularly.

These fees for ongoing services are charged on a monthly basis during the period when they are provided. Transaction-based fees are charged when the transaction takes place or charged monthly at the end of the month.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.19. Revenue recognition [continued]****2.19.1. Fees and commissions [continued]****Fees and commissions related to security account management services**

The Group provides its clients security account management services. Fees will be charged for account management and transactions on accounts. Account management fees are typically charged quarterly or annually. The amount is determined in %, based on the stocks of securities managed by the clients on the account in a given period. Fees for transactions on the securities account are charged immediately after the transaction. They are determined in %, based on the transaction amount. Fees for complex services provided to clients (e.g. portfolio management or custody) are typically charged monthly or annually. The fees are fixed monthly amounts and in some cases a bonus fee are charged.

These fees for ongoing services are charged quarterly or annually during the period when they are provided. The fees are accrued monthly. Transaction-based fees are charged when the transaction takes place.

**Fees and commissions related to fund management**

Fees from fund management services provided to investment funds and from portfolio management provided to insurance companies, funds. The fee income are calculated on the basis of net asset value of the portfolio and by the fee rates determined in the contracts about portfolio management.

These fees for ongoing services are charged usually on monthly (mutual funds) or semi-annually (venture capital funds) during the period when they are provided but accrued monthly.

**Net insurance fee income**

Due to the fact that the Group rarely provides insurance services to its clients, only acts as an agent, the fee income charged to the customers and fees payable to the insurance company are presented net in the fee income. In addition, agency fee charged for the sale of insurance contracts is also recorded in this line. The fee is charged on a monthly basis and determined in %.

Fees for ongoing services are charged on a monthly basis during the period when they are provided.

**Other fees**

Fees that are not significant in the Group total income are included in Other fees category. Such fees are safe lease, special procedure fee, account rent fee, fee of a copy of document, etc. Other fees may include charges for continuous services or for ad hoc administration services. Continuous fees are charged monthly (e.g., safe lease fees) at the beginning of the period, typically at a fixed rate. Fees for ad hoc services are charged immediately after the service obligation were met, usually in a fixed amount.

These fees for ongoing services are charged on a monthly basis during the period when they are provided. Fees for ad hoc services are charged when the transaction takes place.

**2.19.2. Other revenue from customers**

Other revenue from customers contains revenues from:

- sale of agricultural produce,
- tourism activity,
- gain on transactions related to property activities,
- rental income,
- income from computer programming.

Revenue is measured based on the consideration to which the Group expects to be entitled in a contract with customers and excludes amount collected on behalf of third parties. The Group recognizes revenue when it transfers control of a product or service to customers. The Group has generally concluded that it is the principal in its revenue arrangements, because it typically controls the goods and services before transferring them to the customer.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.19. Revenue recognition [continued]****2.19.2. Other revenue from customers [continued]**

Typically, the Group's other revenue from customers is recognized at the point in time when control of the goods or services is transferred to the customer. Exceptions are revenues services provided to customers – for example rental income – where the customer simultaneously receives and consumes the benefits as the Group performs.

The Group considers whether there are other promises in the contract that are separate performance obligations to which a portion of the transaction price needs to be allocated. In determining the transaction price, the Group considers the effects of variable consideration, existence of a significant financing component, and a consideration payable to the customer, if any.

**2.20. Profit from associates**

Profit from associates refers to any distribution of an entity earnings to shareholders from stocks or mutual funds that is owned by the Group. The Group recognizes profit from associates in the Consolidated Financial Statements when its right to receive payment is established.

**2.21. Income tax**

The Group considers corporate income tax as current tax according to IAS 12. The Group also considers local business tax and the innovation contribution as income tax in Hungary.

The annual taxation charge is based on the tax payable under fiscal regulations prevailing in the country where the company is incorporated, adjusted for deferred taxation. Deferred taxation is accounted for using the balance sheet liability method in respect of temporary differences between the tax bases of assets and liabilities and their carrying value for financial reporting purposes, measured at the tax rates that apply to the future period when the asset is expected to be realized or the liability is settled.

Current tax asset or current tax liability is presented related to income tax and innovation contribution separately in the Consolidated Statement of Financial Position.

Pillar Two – Global Anti-base Erosion Model Rules (“Globe”), global minimum tax – introduced a minimum effective tax rate of at least 15%, calculated based on a specific rule set. Pillar Two legislation has been enacted in certain jurisdictions where the Group operates. The legislation became effective for the Group's financial year beginning 1 January 2024. The Group considers this top-up tax as an income tax according to IAS 12.

Deferred tax assets are recognized by the Group for the amounts of income taxes that are recoverable in future periods in respect of deductible temporary differences as well as the carryforward of unused tax losses and the carryforward of unused tax credits.

The Group recognizes a deferred tax asset for all deductible temporary differences arising from investments in subsidiaries, branches and associates, and interests in joint arrangements, to the extent that, and only to the extent that, it is probable that:

- the temporary difference will reverse in the foreseeable future; and
- taxable profit will be available against which the temporary difference can be utilised.

The Group considers the availability of qualifying taxable temporary differences and the probability of other future taxable profits to determine whether future taxable profits will be available according to IAS 12.

The Group recognizes a deferred tax liability for all taxable temporary differences associated with investments in subsidiaries, branches and associates, and interests in joint arrangements, except to the extent that both of the following conditions are satisfied:

- the Bank is able to control the timing of the reversal of the temporary difference, and
- it is probable that the temporary difference will not reverse in the foreseeable future.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.21. Income tax [continued]**

The Group only offsets its deferred tax liabilities against deferred tax assets when:

- there is a legally enforceable right to set-off current tax liabilities against current tax assets, and
- the taxes are levied by the same taxation authorities on either
  - the same taxable entity or
  - different taxable entities which intend to settle current tax liabilities and assets on a net basis.

**2.22. Banking tax**

The Bank and some of its subsidiaries are obliged to pay banking tax based on Act LIX of 2006 in Hungary. As the calculation is not based on the taxable profit but on the adjusted total assets as reported in the Separate Financial Statements of the Bank and its entities for the second period preceding the current tax year, therefore, the banking tax is considered as another administrative expense, not as income tax. Pursuant to Government Decree No. 197/2022 published on 4 June 2022, the Hungarian Government decided to impose a windfall tax on credit institutions and financial enterprises temporarily, that is for 2022 and 2023. These taxes are classified as levies according to IFRS rules. During 2024, the Government amended the Decree on the windfall tax and the obligation was extended to 2025.

**2.23. Off-balance sheet commitments and contingent liabilities**

In the ordinary course of its business, the Group enters into off-balance sheet commitments such as guarantees, letters of credit, commitments to extend credit and transactions with financial instruments. The provision for off-balance sheet commitments and contingent liabilities is maintained at a level adequate to absorb future cash outflows which are probable and relate to present obligations.

In the case of commitments and contingent liabilities, the Management determines the adequacy of the loss allowance based upon reviews of individual items, recent loss experience, current economic conditions, the risk characteristics of the various categories of transactions and other pertinent factors.

The Group recognizes provision for off-balance sheet commitment and contingent liabilities in accordance with IAS 37 when it has a present obligation as a result of a past event; it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation; and a reliable estimate can be made of the obligation. For financial guarantees and loan commitments given which are under IFRS 9 the expected credit loss model is applied when the provision is calculated (see more details in Note 2.6.). After initial recognition the Group subsequently measures those contracts at a higher of the amount of the loss allowance or of the amount initially recognised less the cumulative amount of income recognized in accordance with IFRS 15.

**2.24. Share-based payment**

The Group applies the requirements of IFRS 2 Share-based Payment.

The Group issues equity-settled share-based payment to certain employees. Equity-settled share-based payment is measured at fair value at the grant date. The fair value determined at the grant date of the equity-settled share-based payment is expensed on a straight-line basis over the year, based on the Group's estimate of shares that will eventually vest. Share-based payment is recorded in Consolidated Statement of Profit or Loss as Personnel expenses.

Fair value is measured by use of a binomial model. The expected life used in the model has been adjusted, based on the Management's best estimate, for the effects of non-transferability, exercise restrictions, and behavioural considerations.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.25. Employee benefits**

The Group has applied the requirement of IAS 19 Employee Benefits. These benefits are recognised as an expense and liability undiscounted in the Consolidated Financial Statements. Liabilities are regularly remeasured. Gains or losses due to the remeasurement are recognised in the Consolidated Other Comprehensive Income.

Short-term employee benefits are employee benefits (other than termination benefits) that are expected to be settled wholly before twelve months after the end of the annual reporting period in which the employees render the related service. These can be wages, salaries and bonuses, premium, paid annual leave and paid sick leave and other free services (health care, reward holiday). Long-term employee benefits are mostly the jubilee reward.

Post-employment benefits are employee benefits (other than termination and short-term employee benefits) that are payable after the completion of employment. Post-employment benefit plans are formal or informal arrangements under which an entity provides post-employment benefits for one or more employees. Post-employment benefit plans are classified as either defined contribution plans or defined benefit plans, depending on the economic substance of the plan as derived from its principal terms and conditions.

Defined benefit plan is post-employment benefit plans other than defined contribution plan. The Group's net obligation is calculated by estimating the amount of employee's future benefit based on their services for the current and prior periods. The future value of benefit is being discounted to present value.

Termination benefits are employee benefits provided in exchange for the termination of an employee's employment as a result of either: an entity's decision to terminate an employee's employment before the normal retirement date or an employee's decision to accept an offer of benefits in exchange for the termination of employment. Other long-term employee benefits are all employee benefits other than short-term employee benefits, postemployment benefits and termination benefits.

**2.26. Biological assets and agricultural produce**

The Group recognises a biological asset or agricultural produce according to IAS 41 only when it controls the asset as a result of past events, it is probable that future economic benefits will flow and the fair value or the cost can be measured reliably.

Biological assets are measured on initial recognition and at subsequent periods at fair value less estimated costs to sell unless fair value cannot be reliably measured.

Agricultural produce is measured at fair value less estimated costs to sell at the point of harvest.

The gain on initial recognition of biological assets at fair value less costs to sell, and changes in fair value less costs to sell of biological assets during a period are included in profit or loss for the period in which it arises as other operating income.

**2.27. Consolidated Statement of Cash Flows**

Cash flows arising from the operating, investing or financing activities are reported in the Statement of Cash Flows of the Group primarily on a gross basis. Net basis reporting are applied by the Group in the following cases:

- when the cash flows reflect the activities of the customer rather than those of the Group, and
- for items in which the turnover is quick, the amounts are large, and the maturities are short.

For the purposes of reporting Consolidated Statement of Cash Flows, cash and cash equivalents include cash, due from banks and balances with the National Banks, excluding the compulsory reserve established by the National Banks. This line item shows balances of HUF and foreign currency cash amounts, and sight deposit from NBH and from other banks, furthermore, balances of current accounts.

Consolidated cash flows from hedging activities are classified in the same category as the item being hedged. The unrealized gains and losses from the translation of monetary items to the closing foreign exchange rates and unrealized gains and losses from derivative financial instruments are presented net as operating activity separately in the Consolidated Statement of Cash Flows for the monetary items which have been revalued.

**NOTE 2: SUMMARY OF MATERIAL ACCOUNTING POLICIES [continued]****2.28. Segment reporting**

IFRS 8 Operating Segments requires operating segments to be identified on the basis of internal reports about components of the Group that are regularly reviewed by the chief operating decision maker in order to allocate resources to the segments and to assess their performance.

Based on the above, the segments identified by the Group are the business and geographical segments.

The Group's operating segments under IFRS 8 are therefore as follows: OTP Core Hungary, Merkantil Group, Asset Management subsidiaries, Other subsidiaries, Bulgaria, Croatia, Slovenia, Romania, Serbia, Ukraine, Russia, Montenegro, Albania, Moldova, Uzbekistan. Romanian segment is classified as discontinued operation from 2023 but in line with management report it is still presented in Segment reporting as separate segment. In tables for 2024 the data for Romanian segment contains incomes and expenses until it was disposed in July 2024.

**2.29. Comparative balances**

These Consolidated Financial Statements are prepared in accordance with the same accounting policies in all respects as the Consolidated Financial Statements prepared in accordance with IFRS as adopted by the European Union for the year ended 31 December 2024.

### **NOTE 3: SIGNIFICANT ACCOUNTING ESTIMATES AND DECISIONS IN THE APPLICATION OF ACCOUNTING POLICIES**

The presentation of financial statements in conformity with IFRS as adopted by EU requires the Management of the Group to make judgement about estimates and assumptions that affect the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities as at the date of the financial statements and their reported amounts of revenues and expenses during the reporting period. The estimates and associated assumptions are based on the expected loss and other factors that are considered to be relevant. The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period. Actual results could differ from those estimates. Significant areas of subjective judgement include:

#### **3.1. Loss allowances on financial instruments exposed to credit risk**

The Group regularly assesses its financial instruments portfolio for loss allowance. Management determines the adequacy of the loss allowances based upon reviews of individual loans and placements, recent loss experience, current economic conditions, the risk characteristics of the various categories of loans and other pertinent factors. The use of the three-stage model was implemented for IFRS 9 purposes. The impairment methodology is used to classify financial instruments in order to determine whether credit risk has significantly increased since initial recognition and to identify the credit-impaired assets. For instruments with credit-impairment or significant increase of credit risk lifetime expected losses are recognized (see more details in Note 37.1.)

#### **3.2. Valuation of instruments without direct quotations**

Financial instruments without direct quotations in an active market are valued using the valuation model technique. The models are regularly reviewed and each model is calibrated for the most recent available market data. While the models are built only on available data, their use is subject to certain assumptions and estimates (e.g. correlations, volatilities, etc.). Changes in the model assumptions may affect the reported fair value of the relevant financial instruments.

IFRS 13 Fair Value Measurement seeks to increase the consistency and comparability in fair value measurements and related disclosures through a 'fair value hierarchy'. The hierarchy categorises the inputs used in valuation techniques into three levels. The hierarchy gives the highest priority to (unadjusted) quoted prices in active markets for identical assets or liabilities and the lowest priority to unobservable inputs. The Group evaluates the levelling at each reporting period on an instrument-by-instrument basis and reclassifies instruments when necessary, based on the facts at the beginning of the reporting period. The objective of a fair value measurement is to estimate the price at which an orderly transaction to sell the asset or to transfer the liability would take place between market participants at the measurement date under current market conditions.

#### **3.3. Provisions**

Provision is recognized and measured for commitments to extend credit and for warranties arising from banking activities based on IFRS 9 Financial Instruments. Provision for these instruments is recognized based on the credit conversion factor, which shows the proportion of the undrawn credit line that will probably be drawn.

Other provisions are recognized and measured based on IAS 37 Provisions, Contingent Liabilities and Contingent Assets. The Group is involved in a number of ongoing legal disputes. Based upon historical experience and expert reports, the Group assesses the developments in these cases, and the likelihood and the amount of potential financial losses which are appropriately provided for. (See Note 24.)

Other provision includes provision for litigation, provision for retirement and expected liabilities and provision for confirmed letter of credit.

A provision is recognized by the Group when it has a present obligation as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation.

#### **3.4. Impairment on goodwill**

Goodwill acquired in a business combination is tested for impairment annually or more frequently when there is an indication that the unit might be impaired, in accordance with IAS 36 "Impairment of assets".

The Group calculates the fair value based on discounted cash flow model. The 3-year period explicit cash flow model serves as a basis for the impairment test by which the Group defines the impairment need on goodwill based on the strategic factors and financial data of its cash-generating units. In the calculation of the goodwill impairment, also the expectations about possible variations in the amount or timing of those future cash flows, the time value of money, represented by the current market risk-free rate of interest and other factors are reflected.

**NOTE 3: SIGNIFICANT ACCOUNTING ESTIMATES AND DECISIONS IN THE APPLICATION OF ACCOUNTING POLICIES [continued]****3.5. Contingent consideration**

Contingent consideration generally arises where the acquirer agrees to transfer additional consideration to the former owners of the acquired business after the acquisition date if certain specified events occur or conditions are met in the future.

These future payments may be in cash or other assets and may be contingent upon the achievement of specified events, and/or may be linked to future financial performance over a specified period of time.

Some changes in the fair value of contingent consideration may be the result of additional information that the acquirer obtained after the acquisition date about fact and circumstances that existed at that date. Such changes are measurement period adjustments and have impact of goodwill/negative goodwill. Changes resulting from events after the acquisition date are not measurement period adjustments. Contingent considerations should be recorded on the date of acquisition in consolidated financial statement at fair value.

The Group so far settled the contingent considerations in cash. The fair value estimation is made by the “Merger & Acquisition” team based on the sale and purchase agreement (“SPA”) and other available information.

Regarding the contingent consideration related to the acquisition of Ipoteka Bank, OTP concluded the contract including two instalments: first for 73.71% of the shares in 2023 (in December 2023 it increased to 79.58% after capital increase), then second for 24.57% (in December 2023 it decreased to 19.16% after capital increase) of the shares 3 years later. The price of 19.16% of the shares is variable, but within a predefined range and can be adjusted only with factors that have not direct connection with the profit of Ipoteka Bank. The purchase of the second stock cannot be avoided by the parties since the execution of the SPA. Considering the elements of the shares retained by Ministry of Finance of the Republic of Uzbekistan for the given period are treated as financial liability.

The recognized liability includes the estimate of the adjustments to the second purchase price and does not include the items that are considered as indemnity. Indemnification related expected cash-inflow is recognized as indemnification asset (measured consistently with the measurement of underlying assets).

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP****Macro economy and financial situation in Hungary**

The Trump administration, which took office on 20 January 2025, significantly changed the global economy in 2025, when it began to implement campaign promises, including the introduction of import tariffs. The unfolding tariff war caused huge turbulence in the markets through unpredictability, economic damage and the disruption of trade relations. Year 2025 also brought a major change in the direction of the USA's foreign policy, which, amid increasing geopolitical conflicts around the world, forced its allies, including NATO members, to boost their defence spending, placing a serious burden on their budgets. After the increase in yields owing to Donald Trump's victory in 2024, developed markets' bond yields declined somewhat in 2025, and the dollar has weakened against the euro.

In the first quarter of 2025, the US economy felt the pain of preparing for the tariff war: to avoid tariffs, imports were brought forward, which, through falling net exports, has slowed economic growth to a halt but this was reversed in the second and third quarters. Overall, the US economy sailed through the first year of the second Trump administration with a better performance than the 1.5-2.0% growth expected at the beginning of 2025. Based on the available data, annual growth exceeded 2%, fuelled by consumer spending and AI investments. The outlook for the labour market was clouded by strict immigration policy of US Government, by demographic trends, and by the rapid rise of artificial intelligence, while, despite the US president's plans, the industry failed to create a large number of new jobs. Nevertheless, the situation in the labour market, which deteriorated rapidly in the first half of the year, stabilized by the end of 2025. Despite the inflationary economic policy measures of the new administration, inflation did not accelerate, yet it remained above the Fed's 2% target, which justified caution regarding interest rate cuts, despite deteriorating labour market conditions. The interest rate cut cycle that began at the end of 2024 came to a halt at the beginning of 2025 and the next cut did not come before September. Thus, the base rate was reduced by a total of 75 basis points, to 3.5-3.75%, by the end of the year. There is still significant tension in the bond market, because the debt-to-GDP ratio is at an all-time high, around 125%, and the deficit remained at an elevated level, above 5% of GDP, because despite the significant improvement in the budget balance thanks to tariff revenues, the Trump administration's Big Beautiful Bill extended tax breaks, while the promised spending cuts were not implemented.

Despite the tariff war and increasing geopolitical tensions, the eurozone's recovery from previous shocks (energy crisis, war, inflation, and interest rate shocks) continued throughout 2025. Adding to the euro area economy's problems, the block is forced to reallocate huge amounts of money to defence spending, meanwhile, the car industry, the flagship of the European manufacturing industry, is lagging behind in technological transition. In 2025, the eurozone's GDP expanded by 1.5% including Ireland's extremely volatile figures; without Ireland, the growth rate was 1.0%. The unemployment rate was at a historic low of 6.2% in December. Inflation was still well above the 2% target in the first months of the year, but in the rest of the year both headline and core inflation fell back, drawing closer to the ECB's target. Wage growth, which had previously fuelled inflation, slowed in the second half of 2025, so by the end of the year only the high level of services inflation was a cause for concern. In the first half-year, the ECB cut the effective (deposit) rate from 2.75% to 2.0%, the main refinancing rate from 3.15% to 2.15%, and the marginal lending rate from 3.15% to 2.4%, and they remained at these levels until the end of the year. In Europe, investors also focus on concerns about fiscal sustainability, especially in France, which is struggling with 110% public debt and 6% deficit, as well as political crises.

Hungary's economy has been practically stagnant since 2023 on account of the energy crisis, shrinking export markets, strong exposure to the automotive and battery industries, the freezing of EU funds, the collapse of the previous investment boom, and pressure for strictness in economic policy. Although fiscal austerity ended in 2025 and Europe's growth also improved towards the end of 2025, Hungary's economic growth remained pale throughout last year, when GDP expanded by barely 0.4%, according to preliminary data from the KSH statistical office, as consumption growth was offset by shrinking investment and declining exports. The tightness of the labour market clearly decreased during the year, but the unemployment rate did not increase meaningfully.

By the beginning of 2025, headline and constant tax core inflation (the latter is closely watched by the MNB) both accelerated to almost 6%. The reasons for the walking inflation are manifold: inflation expectations stuck at elevated levels, corporations' rapid repricing, the weak forint at the end of 2024, rising food prices, excessively high wage dynamics, and passed-on special taxes all contributed. The government and the MNB both reacted to the high inflation. The government has been curbing price increases with a number of administrative measures since spring 2025, which have held back price growth by around 1.5 percentage points. In order to achieve the inflation target, the MNB's new leadership broke with the policy of the weak forint and, despite expectations of an interest rate cut, left the key interest rate at 6.5% until the end of 2025. This, together with several other favourable factors, strengthened the forint, helping to bring down the EUR/HUF below 385 by the end of 2025, from around 410 at the year-beginning.

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP**  
**[continued]**

**Macro economy and financial situation in Hungary [continued]**

According to the Ministry of National Economy, Hungary's budget deficit amounted to 4.9% of GDP in 2025, while public debt could be around 74.6% of GDP, in an increase from 73.5% at the end of 2024. The government announced a string of fiscal stimulus measures in 2025, but most of them will affect the budget from 2026 onwards.

Given that Hungary's current account surplus is around 2% of GDP, the gross external debt ratio is between 60% and 65% of GDP, and as foreign exchange reserves are about EUR 10 billion higher than the reserve adequacy rules require, Hungary's external balance position is much stronger than the level that be considered sustainable.

All international credit rating agencies rated Hungary's sovereign debt as investment grade last year.

In 2025, Hungary's housing market was significantly boosted by the expansion of available subsidies, the Home Start programme, which reduced the effective lending rate to 3%, and by the rapid wage growth. As a result, the growth of household credit volumes accelerated to 14% (from 9% at the end of 2024), and that of housing loans to 20%, up from 13%.

**Summary of economic policy measures made and other relevant regulatory changes in the period under review**

**Windfall tax**

- On 19 June 2025, the Parliament decided, through Act No. LIV of 2025, to maintain the windfall tax obligation for financial institutions for the year 2026 as well. In 2026, the tax base is the adjusted profit for the year 2024, and the rate increases to 8% up to a tax base of HUF 20 billion, and to 20% above that (from the previous 18%). The option to halve the payable tax remains available under the conditions specified in the act, similarly to previous years.
- In accordance with Government Decree No. 358/2025 (XI.13.), the provisions of the windfall tax legislation shall be applied with the following amendments: from 2026, the tax rate will be 10% (instead of 8%) up to HUF 20 billion tax base, and 30% (instead of 20%) above. In 2026, the rules on tax reduction related to the purchase of government securities were tightened: the reduction may not exceed 10% of the increase in the relevant government securities holdings and may not exceed 30% (instead of 50%) of the windfall tax calculated without taking this reduction into account.

**Interest rate cap**

- On 26 June 2025, Government Decree No. 170/2025 (VI.26) enacted the extension of the interest rate cap on certain housing loans, until 31 December 2025.
- On 26 November 2025, Government Decree No. 364/2025 (XI.26) enacted the extension of the interest rate cap on certain housing loans, until 30 June 2026.

**Freeze on retail banking fees**

- On 9 April 2025, the Hungarian Banking Association agreed with the Ministry of National Economy that banks will not apply fee changes resulting from inflation indexation or increase in other operating cost items to their retail customers until 30 June 2026. Those banks that had already announced their inflation indexation for 2025 according to the law, shall reverse such increases either through itemized refunds or by providing a permanent discount, or with a refund of the same amount at customer group's level. Within this framework, on 8 April 2025, OTP Bank announced that it was ready to reduce the fees of its retail customers by a total of almost HUF 2 billion and to extend certain preferential promotions worth several billions of HUF.
- On the other hand, the banking sector, via the representatives of the Hungarian Banking Association, have also concluded an agreement with the Hungarian National Bank. This agreement, in addition to temporarily reducing the monthly fee of so-called basic accounts which represent a narrow range of bank accounts, also makes a wide range of retail bank accounts simpler and more transparent.

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP**  
**[continued]****Summary of economic policy measures made and other relevant regulatory changes in the period under review [continued]****Cash withdrawals**

- On 29 April 2025, Hungary's National Assembly decided that payment service providers shall provide their customers with cash withdrawal services in all settlements. Based on a decree of the Ministry of National Economy from the end of May, banks are obliged to provide cash withdrawal services to their customers in all settlements with more than 1,000 inhabitants by 31 December 2025, and in all settlements with more than 500 inhabitants by 31 December 2026. Based on the MNB's decree of the end of June, in the case of OTP this means the installation of 195 new or relocated ATMs across Hungary in 2025 and further 233 in 2026.
- Pursuant to Act C of 2025, the monthly limit for free cash withdrawals, available twice per month, was increased to HUF 300,000 effective from 1 February 2026, replacing the former limit of HUF 150,000, that was applicable until the end of January 2026.

**Family support schemes and economic stimulus measures**

- The Workers' Loan Program became available at credit institutions from 2 January 2025. The maximum amount of this interest-free, free-use, state-guaranteed subsidised loan is HUF 4 million, with a term of 10 years. The scheme also features a partial repayment by the State depending on the birth of children.
- From 1 January 2025, housing loans are available for energy-efficient homes up to 90% of the collateral value, and the repayment instalment may reach 60% of the borrower's income, regardless of the income.
- On 1 January 2025, the Rural Home Renovation Subsidy was launched in settlements with less than 5,000 residents with a maximum amount of HUF 3 million, for up to 50% of the labour and material costs. The range of applicants has been modified several times, so now the subsidy is also available to pensioners. For the advance investment costs, borrowers may apply for a subsidized home renovation mortgage loan in a maximum amount of HUF 6 million, with a fixed 3% interest rate.
- On 15 October 2025, the conditions of the energy home renovation programme, targeting the modernisation of family homes built before 2007, were amended. The maximum available amount increased from HUF 6 million to HUF 10 million, of which HUF 5 million is a non-refundable grant and HUF 5 million can be taken as an interest-free loan. The required own contribution was reduced to 5%, mandatory contractor registration was abolished, and the range of eligible renovation activities were widened with for example shading devices, solar collectors, and control systems being included into the list.
- From 6 January 2025, as part of the Demjén Sándor program, export stimulating loan and leasing structures are available in the total sum of HUF 400 billion, partly refinanced by EXIM Hungary. Some of the products are also available for enterprises planning to start export activities in the future.
- The interest rate of certain products under the Széchenyi Card Program MAX+ scheme was significantly reduced for contracts concluded after 1 March 2025: the interest rate on investment loans and the leasing scheme was reduced to 3%, while the interest rate on the Széchenyi Card Overdraft MAX+ and the Liquidity Loan was reduced to 4.5%. The uniform 0.5 pp reduction in client interest rates was facilitated by the burden sharing of KAVOSZ Ltd. (0.1 pp) and the banking sector (0.4 pp).  
On 6 October 2025, the Government announced that the interest rate on business loans available under the Széchenyi Card Program was uniformly reduced to a fixed 3%. The initiative aims to support the liquidity of domestic small and medium-sized enterprises (SMEs) and encourage their investments to stimulate the economy. The liquidity and investment loans available under the programme are freely usable and can be accessed quickly and easily. In 2026, the Government will allocate HUF 60 billion for interest subsidies, while the total state support for the entire Széchenyi Card system will reach HUF 320 billion.
- The subsidized Home Start Loan Program is available from 1 September 2025, regardless of marital status or plans to have children. The terms and conditions of the loan have been modified several times since the announcement, but the essential elements remained unchanged: the maximum amount of the one-time applicable loan is HUF 50 million, with a fixed interest rate of up to 3%, for a maximum term of 25 years and with at least 10% downpayment. The loan is available if, at the time of application and during the preceding 10 years, the applicant has not held more than 50% ownership share in a residential property, and if had at least two years of uninterrupted social security coverage. The loan can be used for residential properties with a maximum value of HUF 100 million in the case of a flat, or HUF 150 million in the case of a house, which price shall not exceed HUF 1.5 million per square metre. The loan may be combined with other (subsidized) home loans. The detailed rules of the loan are set in Government Decree 227/2025 (VII. 31.).

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP  
[continued]****Summary of economic policy measures made and other relevant regulatory changes in the period under review [continued]****Family support schemes and economic stimulus measures [continued]**

- The MNB launched the Qualified Corporate Credit (MVH, Minősített Vállalati Hitel) title in order to intensify competition in the banking system. The aim of the initiative, which was launched following an agreement between the central bank and the Hungarian Banking Association, is to bring investment loans with standardized, transparent terms and conditions to the market, and to make them accessible to a wide range of SMEs, with simple and quick administration and favourable pricing. OTP branches were the first in Hungary to offer the facility to customers, on 1 September.

**Capital regulation**

- Pillar 2 capital requirement: based on the announcement made on 16 December 2025, effective from 1 January 2026 the National Bank of Hungary, including a multilateral procedure involving the European Central Bank, and National Bank of Croatia, imposed the below additional capital requirements for OTP Group, on consolidated level:
  - 1.01%-points in case of the Common Equity Tier1 (CET1) capital, accordingly the minimum requirement for the consolidated CET1 ratio is 5.51% (without regulatory capital buffers);
  - 1.34%-points in case of the Tier1 capital, accordingly the minimum requirement for the consolidated Tier1 ratio is 7.34% (without regulatory capital buffers);
  - 1.79%-points in case of the Total SREP Capital Requirement (TSCR), accordingly the minimum requirement for the consolidated capital adequacy ratio is 9.79% (without regulatory capital buffers).
 These requirements do not represent any change compared to the additional capital requirements applicable in the preceding period.

**Larger one-off / special items*****Special taxes on financial institutions:***

In 2025 HUF 87.4 billion special taxes on financial institutions weighed on earnings (after tax) which incorporates both the old banking tax in Hungary (HUF 29.9 billion after tax) and the windfall tax on extra profits (HUF 49.6 billion after tax). Outside of Hungary, in Slovenia (HUF 7.9 billion after tax) arose banking tax payment obligation. In 2024 HUF 45.5 billion special taxes on financial institutions weighed on earnings (after tax) which incorporates both the old banking tax in Hungary (HUF 28.7 billion after tax) and the windfall tax on extra profits (HUF 6.2 billion after tax). Outside of Hungary, in Slovenia (HUF 9.2 billion after tax) and Romania (HUF 1.3 billion) arose banking tax payment obligations.

***Interest rate cap in Hungary and in previous year also in Serbia:***

In 2025 altogether HUF 7.7 billion (after tax) amount was recognized in relation to the expected negative impact of the rate cap scheme in Hungary. According to the effective regulation, in Hungary the interest rate cap on the affected Hungarian mortgage loans was extended until 30 June 2026.

In 2024 altogether HUF 9.4 billion (after tax) amount was recognized in relation to the expected negative impact of the rate cap scheme in Hungary. According to the effective regulation, in Hungary the interest rate cap on the affected Hungarian mortgage loans was extended until 30 June 2025. In the case of MSE loans the rate cap was terminated by 1 April 2024. On 21 November, the National Bank of Serbia approved the extension of the mortgage interest rate cap introduced in October 2023, a measure that would have expired at the end of 2024. The interest rate cap on variable-rate loans increased from 4.1% in 2024 to 5% between 1 January and 31 December 2025. In the fourth quarter of 2024 HUF 2.1 billion modification loss was booked as a result of the extension of the interest rate cap.

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP**  
**[continued]****Summary of economic policy measures made and other relevant regulatory changes in the period under review [continued]****Larger one-off items [continued]*****Provision on Russian bonds:***

In Hungary and Bulgaria HUF 5.1 billion (after tax) impairment was created on Russian bonds, of which HUF 6.4 billion (after tax) was booked at OTP Bank (Hungary) and HUF 1.3 billion (after tax) release at DSK Bank (Bulgaria). Consequently, the coverage of Russian bonds increased from 73% in 2024 to 74% in 2025.

On 4 December 2025 around EUR 63 million equivalent Russian bonds matured. Of this amount, EUR 21 million was paid out on the maturity date in Russian roubles, while the authorisation process for the payment of the remaining amount was completed in December. In the period since then, the relevant legal proceedings have been initiated, which – if concluded favourably – are expected to result in the principal repayments being credited to the own accounts of OTP Bank and DSK Bank. Management's expectations regarding the ongoing proceedings related to the principal repayments are positive, as no circumstances have arisen to date that would suggest that the amounts will not be credited to the own accounts of OTP Bank and DSK Bank.

In Hungary and Bulgaria HUF 45 billion impairment was created on Russian bonds, of which HUF 37.6 billion was booked at OTP Bank (Hungary) and HUF 7.5 billion at DSK Bank (Bulgaria). Consequently, the coverage of Russian bonds increased from 36% in 2023 to 73% in 2024.

***Revaluation result of retail subsidized loans:***

Based on the IFRS9 accounting standard, some Hungarian subsidized mortgage loans, such as CSOK (Housing Subsidy for Families), CSOK Plus and Home Start, as well as baby loans and worker' loans must be recorded in the statement of financial position at fair value through profit or loss. The negative revaluation result of these loans amounted to HUF 5.8 billion (after tax) in 2025. The positive revaluation result of these loans (except worker' loans) amounted to HUF 23.5 billion (after tax) in 2024.

**The principles used in the preparation of the Consolidated Statement of Financial Position as at 31 December 2025 in connection with the evaluation of Russian and Ukrainian exposures****Ukraine**

In 2022 Russia launched a still ongoing war against Ukraine.

OTP Group's Ukrainian operation incorporates the Ukrainian bank, as well as the leasing and factoring companies. The country-consolidated Ukrainian total assets represented HUF 1,139 billion at the end of 2025 (2.5% of total consolidated assets), while net loans comprised HUF 410 billion (1.6% of consolidated net loans) and shareholders' equity amounted to HUF 212 billion (3.8% of the consolidated total equity).

At the end of 2025 the gross intragroup funding towards the Ukrainian operation represented HUF 49 billion, while taking into account the Ukrainian deposits placed with the Headquarters, i.e. the net group funding stood at HUF 25 billion equivalent towards the Ukrainian operation.

In 2025 the Ukrainian operation posted a profit after tax of HUF 55.8 billion, one third more than the HUF 41.2 billion in 2024.

The country-consolidated Ukrainian total assets represented HUF 1,187 billion at the end of 2024 (2.7% of total consolidated assets), while net loans comprised HUF 389 billion (1.7% of consolidated net loans) and shareholders' equity amounted to HUF 206 billion (4.0% of the consolidated total equity).

At the end of 2024 the gross intragroup funding towards the Ukrainian operation represented HUF 55 billion, while taking into account the Ukrainian deposits placed with the Headquarters, i.e. the net group funding stood at HUF 14 billion equivalent towards the Ukrainian operation.

In 2024 the Ukrainian operation posted a profit after tax of HUF 41.2 billion, slightly less than the HUF 44.9 billion in 2023.

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP  
[continued]****Summary of economic policy measures made and other relevant regulatory changes in the period under review [continued]****The principles used in the preparation of the Consolidated Statement of Financial Position as at 31 December 2025 in connection with the evaluation of Russian and Ukrainian exposures [continued]****Russia**

The total assets of the Group's Russian operation represented HUF 3.321 billion at the end of 2025 (7.3% of consolidated total assets), while net loans comprised HUF 1,497 billion (5.8% of consolidated net loans) and shareholders' equity HUF 440 billion (7.8% of consolidated total equity).

The Russian operation posted HUF 202.0 billion profit after tax in 2025, after the HUF 136.9 billion profit reached in full-year 2024.

As the Russian subsidiary repaid its maturing intragroup loans in the fourth quarter of 2022, the gross intragroup funding towards the Russian operation declined to zero and remained nil since then. At the end of 2024 the intragroup subordinated loan exposure toward the Russian operation amounted to HUF 9 billion equivalent.

Based on individual permits issued by the Central Bank of Russia, a total of RUB 67.7 billion (HUF 278.9 billion) in dividends has been paid since September 2023, of which RUB 25.9 billion (HUF 106.7 billion) was paid in 2025.

The total assets of the Group's Russian operation represented HUF 2,371 billion at the end of 2024 (5.5% of consolidated total assets), while net loans comprised HUF 998 billion (4.3% of consolidated net loans) and shareholders' equity HUF 299 billion (5.8% of consolidated total equity).

The Russian operation posted HUF 136.9 billion profit after tax in 2024, after the HUF 95.7 billion profit reached in full-year 2023.

In the case of Ukraine and Russia OTP management applies a „going concern” approach, however in Russia the management is still considering all strategic options, bearing in mind that any future solution should be strictly within the framework and in accordance with applicable local and international regulations.

If the Russian entity was deconsolidated and the outstanding gross intragroup exposures were written off as well, the effect for the consolidated CET1 ratio would be +13 bps, whereas in the case of Ukraine this effect would be -10 bps as at 31 December 2025.

If the Russian entity was deconsolidated and the outstanding gross intragroup exposures were written off as well, the effect for the consolidated CET1 ratio would be +30 bps, whereas in the Ukraine the effect would be +8 bps as at 31 December 2024.

**Significant estimates affected by the Russian-Ukrainian conflict during the preparation of these Consolidated Financial Statements**

During the preparation of these Consolidated Financial Statements, the Group identified the following estimates, which were significantly affected by the Russian-Ukrainian conflict:

- 1) Evaluation of Russian sovereign exposures (government securities) and related reserves for expected credit losses
  - a) exposures of the Russian subsidiary bank
  - b) exposures of other members of the group (parent company and subsidiaries)
- 2) Evaluation of Ukrainian sovereign exposures (government securities) and related reserves for expected credit losses
  - a) exposures of the Ukrainian subsidiary bank
  - b) exposures of other members of the group (parent company and subsidiaries)
- 3) evaluation of derivative transactions denominated in Russian rubles
- 4) evaluation of derivative transactions denominated in the Ukrainian hryvnia
- 5) claims against Russian and Ukrainian central banks, provisions for expected credit losses related to Russian and Ukrainian interbank claims and customer loans
  - a) the impact of the deterioration of the Russian and Ukrainian macro-environment
  - b) following direct exposure to the Russian and Ukrainian markets, non-Russian and Ukrainian bank exposures
  - c) exposures of Russian and Ukrainian subsidiary banks
- 6) evaluation of goodwill
- 7) deferred tax assets

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP [continued]****Significant estimates affected by the Russian-Ukrainian conflict during the preparation of these Consolidated Financial Statements [continued]****Consolidated Russian and Ukrainian exposures as at 31 December 2025**

	Russia			Ukraine			Other countries		
	Reference	Gross value	Impairment / Depreciation	Reference	Gross value	Impairment / Depreciation	Reference	Gross value	Impairment / Depreciation
Cash, amounts due from banks and balances with the National Banks		169,574	-		63,316	6		720	-
Placements with other banks	5	1,242,147	197	5	58,580	79		-	-
Repo receivables		-	-		12,552	790		-	-
Financial assets at fair value through profit or loss - derivatives	3	-	-	4	286	-		-	-
Securities at fair value through other comprehensive income	1a	18,246	-	2a	134,852	-		53,009	44,149
Securities at amortized cost		-	-	2a	398,323	211		21,745	18,289
Loans at amortized cost	5	1,740,830	235,528	5	343,216	31,667	5	8,058	3,463
Finance lease receivables		-	-		102,779	4,099		11	-
Property and equipment		39,332	22,810		27,222	9,860		-	-
Intangible assets and goodwill		45,969	20,166		14,855	9,090	6	-	-
Right-of-use assets		20,312	9,450		5,213	3,014		-	-
Investment properties		-	-		10	-		-	-
Deferred tax assets	7	41,403	-	7	2,266	-		-	-
Current income tax receivables		1,467	-		566	-		-	-
Other assets		<u>29,378</u>	<u>7,560</u>		<u>10,769</u>	<u>958</u>		33,996	23,783
<b>TOTAL ASSETS</b>		<b><u>3,348,658</u></b>	<b><u>295,711</u></b>		<b><u>1,174,805</u></b>	<b><u>59,774</u></b>		<b><u>117,539</u></b>	<b><u>89,684</u></b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks		46,315	-		22,684	-		-	-
Deposits from customers		<u>2,686,023</u>	-		<u>828,899</u>	-		<u>68,006</u>	-
<b>TOTAL LIABILITIES</b>		<b><u>2,732,338</u></b>	<b><u>≡</u></b>		<b><u>851,583</u></b>	<b><u>≡</u></b>		<b><u>68,006</u></b>	<b><u>≡</u></b>

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP [continued]****Significant estimates affected by the Russian-Ukrainian conflict during the preparation of these Consolidated Financial Statements [continued]****Consolidated Russian and Ukrainian exposures as at 31 December 2024**

	Reference	Russia Gross value	Impairment / Depreciation	Reference	Ukraine Gross value	Impairment / Depreciation	Reference	Other countries Gross value	Impairment / Depreciation
Cash, amounts due from banks and balances with the National Banks		87,222	-		72,907	6		765	-
Placements with other banks	5	1,086,808	-	5	59,855	58		-	-
Repo receivables		-	-		7,639	301		-	-
Financial assets at fair value through profit or loss - derivatives	3	685	-	4	88	-		-	-
Securities at fair value through other comprehensive income	1a	20,072	-	2a	155,135	-		77,352	55,057
Securities at amortized cost				2a	428,804	118		36,442	26,299
Loans at amortized cost	5	1,111,220	113,633	5	318,264	34,352	5	13,626	7,034
Finance lease receivables					122,633	17,931		-	-
Property and equipment		29,554	18,747		24,518	9,109		-	-
Intangible assets and goodwill		34,887	15,199		14,731	8,697	6	-	-
Right-of-use assets		12,161	7,664		5,969	3,482		-	-
Investment properties		-	-		231	-		-	-
Deferred tax assets	7	22,563	-	7	-	-		-	-
Current income tax receivables		21	-		364	--		=	=
Other assets		<u>18,390</u>	<u>6,711</u>		<u>9,704</u>	<u>1,344</u>		<u>14,375</u>	<u>12,493</u>
<b>TOTAL ASSETS</b>		<b><u>2,423,583</u></b>	<b><u>161,954</u></b>		<b><u>1,220,842</u></b>	<b><u>75,398</u></b>		<b><u>142,560</u></b>	<b><u>100,883</u></b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks		44,256	-		42,786	-		-	-
Deposits from customers		<u>1,876,526</u>	=		<u>842,437</u>	=		<u>59,289</u>	=
<b>TOTAL LIABILITIES</b>		<b><u>1,920,782</u></b>	<b>=</b>		<b><u>885,223</u></b>	<b>=</b>		<b><u>59,289</u></b>	<b>=</b>

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP**  
**[continued]**

**Significant estimates affected by the Russian-Ukrainian conflict during the preparation of these Consolidated Financial Statements [continued]**

During the evaluation of these assets, the Group applied the evaluation principles detailed below, which evaluation contains significant estimates on the part of the Management. The results of the estimates may vary significantly depending on the development of the situation in the Russian-Ukrainian conflict.

**References**

**1a. Evaluation of Russian sovereign exposures and related reserves for expected credit losses - exposures of the Russian subsidiary bank**

Within Russia, Russian government securities are marketable, and their repayment is expected to take place in accordance with the original conditions. The fair value calculation of securities is based on market prices available and observable on local trading platforms.

**1b. Evaluation of Russian sovereign exposures and related reserves for expected credit losses - other exposures of the group**

Outside of Russia, the marketability of Russian government securities is significantly limited due to sanctions and capital market participants turning away from Russian securities. The credit rating of the Russian state was withdrawn in 2022, the Group classifies the Russian state as non-performing, and in accordance with this, it assigned the affected exposures to the Stage 3 category. The Russian state not only recognizes its obligation and has the necessary financial reserves, but would also be willing to pay, so the increased loss potential is caused by non-traditional credit risks. In the case of a portfolio valued at fair value through other comprehensive income, the book value is determined based on the level 3 prices of IFRS13. Cash flow estimation, current market benchmarks (provided by Bloomberg), liquidity and non-credit risk considerations were taken into account in fair value calculation.

During 2025, the Bank conservatively increased provisions on its Russian sovereign exposures for the non-matured bonds. The Bank uses a time band approach to these, the provision level is higher for the securities with longer maturity.

In the case of overdue receivables, the Group determines the impairment based on its expectations regarding the probability of recovery. Basically, a higher probability of return can be assigned to those items for which, as a result of the legal steps taken by the Group, the claim has been paid in RUB by the competent Russian clearing house (NSD) and access to the relevant amounts is subject to Hungarian authority approvals or modification of the legal background. It is taken into consideration in the provision levels, that the latter can mean a long lasting process, but based on previous experience, it has a favorable outcome, and in several cases a decision has been made to release the blocking. Therefore, a smaller reduction in the impairment of these items was made during 2025.

On the other hand, a lower probability of return and a longer time period were determined for those items where the payment is expected in EUR or USD with the help of European clearing houses (Euroclear, Clearstream) requiring a complex legal process. Here the previously high-level of impairment remains unchanged in 2025.

The claims from the overdue Russian government bonds are classified to Other financial asset line and in the above table presented within Other countries in the amount of HUF 34 billion with the impairment of HUF 23.8 billion.

**2a. Valuation of Ukrainian sovereign exposures and related reserves for expected credit losses - exposures of the Ukrainian subsidiary bank**

The marketability of local government securities and the liquidity of the market are limited in Ukraine.

Ukrainian government securities can only be found in the books of the Ukrainian subsidiary as these exposures were acquired after start of the war they are classified as Stage 1. In the case of a portfolio valued at fair value through other comprehensive results, the book value is determined based on the level 3 prices of IFRS13. During the actual evaluation, the expected cash flow is discounted using yield curves observed based on current market benchmarks (published by the National Bank of Ukraine).

In order to reflect the increased uncertainty about external support of Ukraine, decision was made on additional provision for the sovereign portfolio of the Ukrainian group-member on a conservative basis at Group level only reflecting a prudential overlay in early 2025, which we continue to maintain.

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP**  
**[continued]**

**Significant estimates affected by the Russian-Ukrainian conflict during the preparation of these Consolidated Financial Statements [continued]**

**References [continued]**

**2b. Valuation of Ukrainian sovereign exposures and related reserves for expected credit losses - other exposures of the group**

Ukrainian government securities are exclusively in the books of the Ukrainian subsidiary.

**3. Valuation of Russian derivative transactions**

In the case of futures contracts concluded with local partners on the Russian market, the evaluation is carried out using yield curves available and observable on the local market. In cases where one of the partners is not Russian, the evaluation is done using yield curves available and observable on the local market.

**4. Valuation of Ukrainian derivatives**

The Treasury turnover of the Ukrainian bank is low, and a significant part of the derivative transactions are related to the bank's risk management and concluded with the parent company. During the actual evaluation, the expected cash flow is discounted using yield curves observed based on current market benchmarks (published by the National Bank of Ukraine).

**5. Claims against Russian and Ukrainian central banks, provisions for expected credit losses related to Russian and Ukrainian interbank claims and customer loans**

As part of the continuous monitoring activity, OTP Group has explored and analyzed the secondary and tertiary negative effects of the war in the corporate segment for Group members outside of Russia and Ukraine, including the effects of the current sanctions policy. In the case of the affected customers, if the increased risk was substantiated, they were classified in the Stage 2 category, while in the case of non-performance, the Group classified the given exposures in the Stage 3 rating category.

In the case of Russian Group members, the impact of the current and forward-looking economic environment was taken into account when determining the expected loss, considering expected low economic growth potential in Russia.

In the case of Ukrainian Group members, the portfolio quality remained stable or even improved in some segments in 2025 and the Bank neither expects significant deterioration in 2026. The impact of the current and forward-looking economic environment was taken into account when determining the expected loss, however, the Bank does not expect any further substantial deterioration of the economic environment. The identification of the increased risk – given the special situation – extends to regionally different war activity. In addition, the territorial distribution of exposures was also taken into account when evaluating the expected loss, in the areas directly and indirectly affected by the war, the Bank does not expect a significant return for non-performing customers, regardless of economic trends.

**6. Evaluation of goodwill**

In connection with the involvement in the Russian-Ukrainian conflict, as a result of the company value review, the Group considered it necessary to fully write off the existing goodwill in the case of the Russian subsidiary bank in the first quarter of 2022, the value of which as at 31 December 2021 was HUF 40.9 billion. The effect of goodwill write-off on the result was HUF 67.7 billion, and a HUF 26.8 billion loss was accounted for against equity. In the case of Ukraine, there was no goodwill write-off.

Based on current experience, the Group takes into account the macroeconomic effects of the current geopolitical situation in the mid- to long-term when determining the impairment of investments in the case of countries affected by the conflict. In the case of Russian and Ukrainian operations, we currently do not consider it likely that the estimated investment value before the conflict (2021) will be reached in the upcoming years as long the uncertainty due to the geopolitical conflict lasts.

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP**  
[continued]

**Significant estimates affected by the Russian-Ukrainian conflict during the preparation of these Consolidated Financial Statements [continued]**

**References [continued]**

**7. Deferred tax**

The Group recognized HUF 2.26 billion deferred tax assets in Ukraine in 2025 after year 2024 when no deferred tax was accounted, while in Russia, the Group recognized HUF 41.39 billion and HUF 22.56 billion deferred tax assets in year 2025 and 2024, respectively.

In general there is no limit to unused tax credits. In addition, if the banks' taxable loss were to increase (if the impairment calculated according to local rules approached the higher level of impairment according to IFRS), the difference between the settlement and the tax loss would decrease, thus reducing the deferred tax asset. As a result, in Russia the bank was able to utilize the temporary deferred tax asset both in the expected profitable operation and in a possible loss scenario. In Ukraine the Law of Ukraine No. IX 4698 of December 3, 2025, amended the Tax Code of Ukraine and determined the peculiarities of banks' taxation for 2026 which introduced restrictions which will be in effect throughout year 2026.

**Financial assets modified in the Group for the year ended 31 December 2025 (in HUF million)**

Modification losses from changes other than Hungarian interest rate cap resulted in HUF 581 million and HUF 325 million loss as at 31 December 2025 and 2024, respectively. In the following tables the modification gains and losses resulting from the prolongation of interest rate caps is presented. The newly granted loans have fixed interest throughout the lifetime and the voluntary interest rate cap does not affect the previously disbursed loans.

**Financial assets modified during the period related to moratorium in the Group for the year ended 31 December 2025 (in HUF mn)**

Please see details in this note above under "Larger one-off items" where Interest rate cap is described.

**Modification due to prolongation of the existing interest rate cap till 30 June 2026**

	<b>Group</b>
Gross carrying amount before modification	208,318
Loss allowance before modification	(1,809)
<b>Net amortized cost before modification</b>	<b><u>206,509</u></b>
Modification loss	(4,238)
<b>Net amortized cost after modification</b>	<b><u>202,271</u></b>

**Modification due to prolongation of the existing interest rate cap till 31 December 2025**

	<b>Group</b>
Gross carrying amount before modification	218,865
Loss allowance before modification	(2,275)
<b>Net amortized cost before modification</b>	<b><u>216,590</u></b>
Modification loss	(4,564)
<b>Net amortized cost after modification</b>	<b><u>212,026</u></b>

**NOTE 4: MACRO ENVIRONMENT, IMPACT OF ECONOMIC SITUATION ON THE GROUP**  
**[continued]**

**Financial assets modified during the period related to moratorium in the Group for the year ended 31 December 2024 (in HUF mn)**

**Modification due to prolongation of the existing interest rate cap till 31 December 2025**

	<b>Group</b>
Gross carrying amount before modification	225,161
Loss allowance before modification	(1,540)
<b>Net amortized cost before modification</b>	<b><u>223,621</u></b>
Modification loss	(2,164)
<b>Net amortized cost after modification</b>	<b><u>221,457</u></b>

**Modification due to prolongation of the existing interest rate cap till 30 June 2025**

	<b>Group</b>
Gross carrying amount before modification	240,610
Loss allowance before modification	(3,716)
<b>Net amortized cost before modification</b>	<b><u>236,894</u></b>
Modification loss	(5,500)
<b>Net amortized cost after modification</b>	<b><u>231,394</u></b>

**Modification due to prolongation of the existing interest rate cap till 31 December 2024**

	<b>Group</b>
Gross carrying amount before modification	236,341
Loss allowance before modification	(2,970)
<b>Net amortized cost before modification</b>	<b><u>233,371</u></b>
Modification loss	(5,204)
<b>Net amortized cost after modification</b>	<b><u>228,167</u></b>

**NOTE 5: CASH, AMOUNTS DUE FROM BANKS AND BALANCES WITH THE NATIONAL BANKS (in HUF mn)**

	31/12/2025	31/12/2024
Cash on hand		
In HUF	88,701	108,186
In foreign currency	<u>540,695</u>	<u>558,501</u>
	<u><b>629,396</b></u>	<u><b>666,687</b></u>
Amounts due from banks and balances with the National Banks		
	31/12/2025	31/12/2024
Within one year		
In HUF	1,085,498	1,532,990
In foreign currency	<u>3,252,488</u>	<u>3,880,608</u>
	<u><b>4,337,986</b></u>	<u><b>5,413,598</b></u>
Over one year		
In HUF	82	-
In foreign currency	=	=
	<u><b>82</b></u>	<u><b>=</b></u>
Loss allowance on amounts due from bank and balances with the National Banks	<u>(1,829)</u>	<u>(1,273)</u>
<b>Total</b>	<u><b>4,965,635</b></u>	<u><b>6,079,012</b></u>
Compulsory reserve set by the National Banks	<u>(2,425,105)</u>	<u>(2,561,725)</u>
<b>Cash and cash equivalents</b>	<u><b>2,540,530</b></u>	<u><b>3,517,287</b></u>

Foreign subsidiary banks within the Group have to comply with country specific regulation of local National Banks. Each country within the Group has its own regulation for compulsory reserve calculation and maintenance. Based on those banks are obliged to place compulsory reserve at their National Bank in a specified percentage of their liabilities considered in compulsory reserve calculation.

An analysis of the change in the loss allowance on amounts from banks and balances with the National Banks is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>1,273</b>	<b>508</b>
Loss allowance for the period	4,021	5,072
Release of loss allowance for the period	(3,561)	(4,332)
Use of loss allowance for the period	(1)	(2)
Foreign currency translation difference	<u>97</u>	<u>27</u>
<b>Closing balance</b>	<u><b>1,829</b></u>	<u><b>1,273</b></u>

**NOTE 6: PLACEMENTS WITH OTHER BANKS (in HUF mn)**

	31/12/2025	31/12/2024
Within one year		
In HUF	88,563	101,743
In foreign currency	<u>1,601,453</u>	<u>1,522,070</u>
	<b><u>1,690,016</u></b>	<b><u>1,623,813</u></b>
Over one year		
In HUF	241,608	192,276
In foreign currency	<u>62,815</u>	<u>77,279</u>
	<b><u>304,423</u></b>	<b><u>269,555</u></b>
Loss allowance on placements	<u>(2,950)</u>	<u>(1,467)</u>
<b>Total</b>	<b><u>1,991,489</u></b>	<b><u>1,891,901</u></b>

An analysis of the change in the loss allowance on placements with other banks is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>1,467</b>	<b>2,247</b>
Loss allowance for the period	4,910	7,207
Release of loss allowance for the period	(4,770)	(5,904)
Use of loss allowance for the period	(4)	(754)
Assets held for sale	-	-
Foreign currency translation difference	<u>1,347</u>	<u>(1,329)</u>
<b>Closing balance</b>	<b><u>2,950</u></b>	<b><u>1,467</u></b>

Interest conditions of placements with other banks:

	31/12/2025	31/12/2024
Interest rates on placements with other banks denominated in HUF	0.00% - 25.00%	0.00% - 25.00%
Interest rates on placements with other banks denominated in foreign currency	(0.43)% - 17.50%	(0.20)% - 21.00%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on placements with other banks denominated in HUF (%)	5.64%	6.67%
Average interest rates on placements with other banks denominated in foreign currency (%)	14.02%	16.91%

**NOTE 7: REPO RECEIVABLES (in HUF mn)**

	31/12/2025	31/12/2024
Within one year		
In HUF	212,092	139,632
In foreign currency	<u>25,975</u>	<u>192,717</u>
	<b><u>238,067</u></b>	<b><u>332,349</u></b>
Over one year		
In HUF	-	-
In foreign currency	<u>26</u>	-
	<b><u>26</u></b>	-
Loss allowance on repo receivables	<u>(949)</u>	<u>(512)</u>
<b>Total</b>	<b><u>237,144</u></b>	<b><u>331,837</u></b>

An analysis of the change in the loss allowance on repo receivables is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>512</b>	<b>593</b>
Loss allowance for the period	3,942	1,839
Release of loss allowance for the period	(3,453)	(1,914)
Foreign currency translation difference	<u>(52)</u>	<u>(6)</u>
<b>Closing balance</b>	<b><u>949</u></b>	<b><u>512</u></b>

Interest conditions of repo receivables (%):

	31/12/2025	31/12/2024
Interest rates on repo receivables denominated in HUF	5.50% - 7.30%	6.00% - 6.90%
Interest rates on repo receivables denominated in foreign currency	1.40% - 16.50%	3.30% - 14.50%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on repo receivables denominated in HUF (%)	6.62%	8.01%
Average interest rates on repo receivables denominated in foreign currency (%)	5.05%	5.57%

Securities as collaterals underlying repo receivable contracts:

<b>Types of securities</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Government bonds	156,894	155,864
Mortgage bonds	64,000	-
Treasury bills	7,000	182,892
Other bonds	<u>3</u>	-
<b>Total</b>	<b><u>227,897</u></b>	<b><u>338,756</u></b>

**NOTE 8: FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS (in HUF mn)**

	31/12/2025	31/12/2024
<b>Trading securities at fair value through profit or loss</b>		
Government bonds	153,499	86,050
Equity instruments and fund units	1,987	1,197
Corporate bonds	1,122	753
Discounted Treasury bills	17,432	3,918
Mortgage bonds	107	102
National Bank of Hungary bonds	37,435	412,402
Other interest-bearing securities	14,400	8,953
Other non-interest-bearing securities	778	982
	<b><u>226,760</u></b>	<b><u>514,357</u></b>
<b>Non-trading instruments mandatorily at fair value through profit or loss</b>		
Open-ended fund units	76,810	73,913
Shares	1,052	2,617
	<b><u>77,862</u></b>	<b><u>76,530</u></b>
<b>Total</b>	<b><u>304,622</u></b>	<b><u>590,887</u></b>
<b>Positive fair value of derivative financial assets held for trading</b>		
	31/12/2025	31/12/2024
Foreign exchange swaps held for trading	47,572	47,685
Interest rate swaps held for trading	40,746	56,637
Commodity swaps	3,297	10,472
CCIRS and mark-to-market CCIRS held-for-trading <sup>1</sup>	5,825	16,443
Foreign exchange forward contracts held for trading	11,228	17,051
Held-for-trading option contracts	3,339	2,711
Held-for-trading forward security agreement	5	21
Other derivative transactions held for trading <sup>2</sup>	8,579	1,493
<b>Total</b>	<b><u>120,591</u></b>	<b><u>152,513</u></b>
<b>Total</b>	<b><u>425,213</u></b>	<b><u>743,400</u></b>

<sup>1</sup> CCIRS: Cross Currency Interest Rate Swaps (See Note 2.5.3.3.)

<sup>2</sup> Other category includes: FX spot, equity swaps, option and index futures.

An analysis of securities held for trading portfolio by currency (%):

	31/12/2025	31/12/2024
Denominated in HUF	72.12%	89.65%
Denominated in foreign currency	27.88%	10.35%
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

**NOTE 8: FINANCIAL ASSETS AT FAIR VALUE THROUGH PROFIT OR LOSS (in HUF mn)**  
**[continued]**

An analysis of government bond portfolio by currency (%):

	31/12/2025	31/12/2024
Denominated in HUF	67.22%	47.56%
Denominated in foreign currency	<u>32.78%</u>	<u>52.44%</u>
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

Interest conditions of held for trading securities (%):

	31/12/2025	31/12/2024
Interest rates on securities held for trading denominated in HUF	0.00% - 9.50%	1.90% - 19.10%
Interest rates on securities held for trading denominated in foreign currency	0.00% - 18.00%	0.00% - 18.00%

Interest conditions and the remaining maturities of **securities held for trading** can be analysed as follows:

	31/12/2025	31/12/2024
Within one year		
With variable interest	10,607	161
With fixed interest	<u>84,847</u>	<u>443,168</u>
	<b><u>95,454</u></b>	<b><u>443,329</u></b>
Over one year		
With variable interest	21,840	3,648
With fixed interest	<u>106,701</u>	<u>65,201</u>
	<b><u>128,541</u></b>	<b><u>68,849</u></b>
Non-interest-bearing securities	<u>2,765</u>	<u>2,179</u>
<b>Total</b>	<b><u>226,760</u></b>	<b><u>514,357</u></b>

Non-trading securities mandatorily at fair value through profit or loss are as follows:

	31/12/2025	31/12/2024
Debt instruments	1,052	2,617
Equity instruments	<u>76,810</u>	<u>73,913</u>
<b>Total</b>	<b><u>77,862</u></b>	<b><u>76,530</u></b>

	31/12/2025	31/12/2024
Profit from associates from shares measured at fair value through profit or loss	11,202	10,246

An analysis of **non-trading securities** mandatorily at fair value through profit or loss portfolio by currency (%):

	31/12/2025	31/12/2024
Denominated in HUF	67.22%	64.74%
Denominated in foreign currency	<u>32.78%</u>	<u>35.26%</u>
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

**NOTE 9: SECURITIES AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME (in HUF mn)**

	31/12/2025	31/12/2024
<b>Securities at fair value through other comprehensive income</b>		
Government bonds	1,858,736	1,312,063
Corporate bonds	26,478	27,043
Listed securities:		
<i>In HUF</i>	-	-
<i>In foreign currency</i>	<u>11,987</u>	<u>12,774</u>
	<b><u>11,987</u></b>	<b><u>12,774</u></b>
Non-listed securities:		
<i>In HUF</i>	6,751	10,140
<i>In foreign currency</i>	<u>7,740</u>	<u>4,129</u>
	<b><u>14,491</u></b>	<b><u>14,269</u></b>
Mortgage bonds	30,167	34,233
Discounted Treasury bills	2,939	-
Interest bearing treasury bills	-	86
Securities issued by the National Bank of Hungary	-	205,050
Other securities	<u>36,193</u>	<u>44,349</u>
<b>Total</b>	<b><u>1,954,513</u></b>	<b><u>1,622,824</u></b>

	31/12/2025	31/12/2024
<b>Non-interest-bearing instruments at fair value through other comprehensive income</b>		
Listed securities:		
<i>In HUF</i>	-	-
<i>In foreign currency</i>	<u>13,160</u>	<u>11,931</u>
	<b><u>13,160</u></b>	<b><u>11,931</u></b>
Non-listed securities:		
<i>In HUF</i>	403	403
<i>In foreign currency</i>	<u>78,338</u>	<u>70,395</u>
	<b><u>78,741</u></b>	<b><u>70,798</u></b>
	<b><u>91,901</u></b>	<b><u>82,729</u></b>
<b>Total</b>	<b><u>2,046,414</u></b>	<b><u>1,705,553</u></b>

Movement table of loss allowance of securities at fair value through other comprehensive income is presented in Note 27.

An analysis of securities at fair value through other comprehensive income by currency (%):

	31/12/2025	31/12/2024
Denominated in HUF	51.69%	35.30%
Denominated in foreign currency	48.31%	64.70%
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

**NOTE 9: SECURITIES AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME**  
(in HUF mn) [continued]

Detailed information of the non-interest-bearing instruments at fair value through other comprehensive income:

	31/12/2025	31/12/2024
<b>Strategic investments closely related to banking activity</b>		
Fair value	89,761	81,031
Dividend income from instruments held at the reporting date	1,001	1,036
<b>Other strategic investments</b>		
Fair value	2,140	1,698
Dividend income from instruments held at the reporting date	41	46
<b>Total</b>		
<b>Total fair values</b>	<b><u>91,901</u></b>	<b><u>82,729</u></b>
<b>Dividend income from instruments held at the reporting date</b>	<b><u>1,042</u></b>	<b><u>1,082</u></b>

During the year ended 31 December 2025 and 2024 no derecognition happened from securities at fair value through other comprehensive income.

An analysis of government bonds by currency (%):

	31/12/2025	31/12/2024
Denominated in HUF	55.19%	27.85%
Denominated in foreign currency	44.81%	72.15%
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

Interest conditions of the security portfolio at fair value through other comprehensive income are as follows (%):

	31/12/2025	31/12/2024
Interest rates on securities at fair value through other comprehensive income denominated in HUF	2.00% - 9.50%	2.00% - 9.75%
Interest rates on securities at fair value through other comprehensive income denominated in foreign currency	0.00% - 19.75%	0.01% - 19.75%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on securities at fair value through other comprehensive income denominated in HUF (%)	3.87%	3.40%
Average interest rates on securities at fair value through other comprehensive income denominated in foreign currency (%)	4.83%	4.49%

**NOTE 9: SECURITIES AT FAIR VALUE THROUGH OTHER COMPREHENSIVE INCOME**  
**(in HUF mn) [continued]**

Interest conditions and the remaining maturities of securities at fair value through other comprehensive income can be analysed as follows:

	31/12/2025	31/12/2024
Within one year		
With variable interest	1,101	6,062
With fixed interest	<u>304,350</u>	<u>577,372</u>
	<b><u>305,451</u></b>	<b><u>583,434</u></b>
Over one year		
With variable interest	224,351	10,457
With fixed interest	<u>1,424,711</u>	<u>1,028,933</u>
	<b><u>1,649,062</u></b>	<b><u>1,039,390</u></b>
Non-interest-bearing securities	<u>91,901</u>	<u>82,729</u>
<b>Total</b>	<b><u>2,046,414</u></b>	<b><u>1,705,553</u></b>

Certain securities are hedged against interest rate risk. See Note 37.4.

**NOTE 10: SECURITIES AT AMORTIZED COST (in HUF mn)**

	31/12/2025	31/12/2024
Government bonds	6,878,782	6,428,625
Corporate bonds	404,632	346,770
Bonds of Hungarian National Bank	154,842	-
Discounted Treasury bills	53,447	137,317
Mortgage bonds	32,029	32,006
Interest bearing Treasury bills	-	1,663
Other securities	<u>436,376</u>	<u>545,301</u>
	<b><u>7,960,108</u></b>	<b><u>7,491,682</u></b>
Loss allowance on securities at amortized cost	<u>(34,643)</u>	<u>(44,505)</u>
<b>Total</b>	<b><u>7,925,465</u></b>	<b><u>7,447,177</u></b>

Interest conditions and the remaining maturities of securities at amortized cost can be analysed as follows:

	31/12/2025	31/12/2024
Within one year		
With variable interest	5,041	-
With fixed interest	<u>2,172,075</u>	<u>1,708,475</u>
	<b><u>2,177,116</u></b>	<b><u>1,708,475</u></b>
Over one year		
With variable interest	50,209	25,325
With fixed interest	<u>5,732,783</u>	<u>5,757,882</u>
	<b><u>5,782,992</u></b>	<b><u>5,783,207</u></b>
<b>Total</b>	<b><u>7,960,108</u></b>	<b><u>7,491,682</u></b>

An analysis of securities at amortized cost by currency (%):

	31/12/2025	31/12/2024
Denominated in HUF	39.82%	39.47%
Denominated in foreign currency	<u>60.18%</u>	<u>60.53%</u>
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

Interest conditions of securities at amortized cost (%):

	31/12/2025	31/12/2024
Interest rates of securities at amortized cost with variable interest	1.20% - 9.00%	2.16% - 9.00%
Interest rates of securities at amortized cost with fixed interest	0.00% - 19.00%	0.00% - 17.14%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on securities at amortized cost denominated in HUF (%)	4.86%	5.43%
Average interest rates on securities at amortized cost denominated in foreign currency (%)	4.03%	4.01%

**NOTE 10: SECURITIES AT AMORTIZED COST (in HUF mn) [continued]**

An analysis of the change in the loss allowance on securities at amortized cost is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>44,505</b>	<b>32,648</b>
Loss allowance for the period	12,694	25,766
Release of loss allowance	(18,252)	(15,707)
Use of loss allowance	-	(634)
Foreign currency translation difference	(4,304)	2,432
<b>Closing balance</b>	<b><u>34,643</u></b>	<b><u>44,505</u></b>

**NOTE 11: LOANS AT AMORTIZED COST AND AT FAIR VALUE (in HUF mn)****Loans at amortized cost**

	<b>31/12/2025</b>	<b>31/12/2024</b>
Within one year		
In HUF	1,755,387	1,657,482
In foreign currency	<u>4,428,041</u>	<u>4,172,610</u>
	<b><u>6,183,428</u></b>	<b><u>5,830,092</u></b>
Over one year		
In HUF	2,771,043	2,501,910
In foreign currency	<u>14,340,202</u>	<u>12,876,113</u>
	<b><u>17,111,245</u></b>	<b><u>15,378,023</u></b>
	<b><u>23,294,673</u></b>	<b><u>21,208,115</u></b>
Loss allowance on loans at amortized cost	<u>(995,095)</u>	<u>(917,734)</u>
<b>Total</b>	<b><u>22,299,578</u></b>	<b><u>20,290,381</u></b>

An analysis of the gross loan portfolio at amortized cost by currency (%):

	<b>31/12/2025</b>	<b>31/12/2024</b>
In HUF	19.43%	19.61%
In foreign currency	<u>80.57%</u>	<u>80.39%</u>
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

Interest rates of the loan portfolio at amortized cost are as follows:

	<b>31/12/2025</b>	<b>31/12/2024</b>
Loans at amortized cost denominated in HUF <sup>1</sup>	0.00% - 56.58%	0.00% - 56.58%
Loans at amortized cost denominated in foreign currency <sup>2</sup>	0.00% - 135.90%	0.00% - 90.00%

<sup>1</sup> The highest interest rate relates to HUF loan is car loan.

<sup>2</sup> The highest interest rate relates to loan in foreign currency is cash on card loans and personal loans in Russia.

	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on loans at amortized cost denominated in HUF (%)	9.73%	10.26%
Average interest rates on loans at amortized cost denominated in foreign currency (%)	7.47%	7.34%

The amount of those loans which were written-off in the current year but they are still subject to enforcement activity to be collected is still going on were HUF 75,055 million and HUF 51,657 million as at 31 December 2025 and 2024, respectively.

**NOTE 11: LOANS AT AMORTIZED COST AND AT FAIR VALUE (in HUF mn) [continued]**

An analysis of the change in the loss allowance on loans is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>917,734</b>	<b>894,031</b>
Loss allowance for the period	740,013	723,674
Release of loss allowance	<u>(538,569)</u>	<u>(580,673)</u>
Loss allowance in the current period	<u>201,444</u>	<u>143,001</u>
from this: effect of change in parameters used for loss allowance calculation	3,671	(37,558)
Use of loss allowance	(50,134)	(119,999)
Partial write-off <sup>1</sup>	(33,941)	(25,455)
Unwinding	(2,405)	56
Foreign currency translation difference	<u>(37,603)</u>	<u>26,100</u>
<b>Closing balance</b>	<b><u>995,095</u></b>	<b><u>917,734</u></b>

<sup>1</sup> See details in Note 2.5.8.

Movement in loss allowance on loans and placements is summarized as below:

	31/12/2025	31/12/2024
Release of loss allowance on placements and loss from derecognition of placements	140	1,303
Loss allowance on loans and gain from derecognition of loans	<u>152,787</u>	<u>76,173</u>
<b>Total <sup>2</sup></b>	<b><u>152,927</u></b>	<b><u>77,476</u></b>

<sup>2</sup> See details in Note 31.

**Loans mandatorily at fair value through profit or loss**

	31/12/2025	31/12/2024
Within one year		
In HUF	106,368	79,661
In foreign currency	-	<u>1,134</u>
	<b><u>106,368</u></b>	<b><u>80,795</u></b>
Over one year		
In HUF	1,833,179	1,477,561
In foreign currency	<u>1,675</u>	<u>1,425</u>
	<b><u>1,834,854</u></b>	<b><u>1,478,986</u></b>
<b>Total</b>	<b><u>1,941,222</u></b>	<b><u>1,559,781</u></b>

**NOTE 11: LOANS AT AMORTIZED COST AND AT FAIR VALUE (in HUF mn) [continued]**

An analysis of the loan portfolio mandatorily at fair value through profit or loss by currency (%):

	<b>31/12/2025</b>	<b>31/12/2024</b>
In HUF	99.91%	99.84%
In foreign currency	<u>0.09%</u>	<u>0.16%</u>
<b>Total</b>	<b><u>100.00%</u></b>	<b><u>100.00%</u></b>

Interest rates of the loan portfolio mandatorily at fair value through profit or loss are as follows (%):

	<b>31/12/2025</b>	<b>31/12/2024</b>
Interest rates on loans denominated in HUF	2.49% - 30.66%	1.31% - 28.32%
Interest rates on loans denominated in foreign currency	5.00% - 8.00%	2.10% - 8.00%

	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on loan portfolio at fair value through profit or loss denominated in HUF (%)	7.52%	6.71%
Average interest rates on loan portfolio at fair value through profit or loss denominated in foreign currency (%)	7.20%	16.78%

**NOTE 12: ASSOCIATES AND OTHER INVESTMENTS (in HUF mn)**

	31/12/2025	31/12/2024
Investments		
Investments in associates (non-listed)	78,628	77,258
Other investments (non-listed)	85,544	57,470
	<u>164,172</u>	<u>134,728</u>
Impairment on investments	(3,754)	(10,205)
<b>Total</b>	<u>160,418</u>	<u>124,523</u>

An analysis of the change in the impairment on investments is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>10,205</b>	<b>9,714</b>
Impairment for the period	131	1,175
Release of impairment for the period	(517)	(218)
Modification due to merge	(5,983)	673
Foreign currency translation difference	(82)	(1,139)
<b>Closing balance</b>	<u><b>3,754</b></u>	<u><b>10,205</b></u>

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn)**

There are different kinds of tangible and intangible assets held by the Group. The next section covers the explanation for the changes from opening values to closing ones in the gross values, the accumulated depreciation and amortization and in the impairment of the tangible and intangible assets in the Group. Relevant information about the fair values of the tangible assets and gross amounts of those assets which were fully depreciated but which are still in use is specified below.

The carrying amount of the temporarily idle properties was HUF 2,871 million and HUF 3,103 million as at 31 December 2025 and 2024, respectively.

There was HUF 72 million restriction on title and properties, plants or equipment pledged as security for liabilities as at 31 December 2025, while in previous period there was no restriction as at 31 December 2024.

As at 31 December 2025 and 31 December 2024 the amount of contractual commitments for the acquisition of tangible and intangible assets was HUF 34,218 million and HUF 21,748 million, respectively. For research and development purposes HUF 2,047 million and HUF 1,672 million expenses was accounted as at 31 December 2025 and 2024, respectively.

Impairment for the properties in the current period was necessary as a result of the valuation performed by using the comparative value method (market analogy method) with direct comparison to the market price of other similar properties. Actual market transactions were used based on the 6-month period prior to the valuation date where the market price of the analogous property is adjusted by an expert coefficient for market adaptation ("ECMA"). Usually this range is from -25% to +25% and reflects the availability of sufficient market information for similar items. In case of these properties ECMA exceeded this range where the circumstances were exceptional although by decision of the appraiser it was used only for unique properties with characteristics similar to the appraised ones, for which no sufficient market analogues are available. The price was adjusted by coefficients reflecting the area, location, size and structure of the property, as well as a weighing factor reflecting the weight of the selected market analogies in the determined fair value.

The Bank decided that the recoverable amount of goodwill is determined based on fair value less cost of disposal. When the Bank prepares goodwill impairment tests of the subsidiaries, the two methods which are used based on discounted cash flow calculation that shows the same result; however, they represent different economical logics. Based on the internal regulation of the Bank as at 31 December 2025 impairment test was prepared where a three-year cash flow model was applied with an explicit period between 2026-2028. The basis for the estimation was the actual data of November 2025 and based on the prepared medium-term (2026-2028) forecasts. When the Bank prepared the calculations for the period 2026-2028, it considered the actual worldwide economic situations, the expected economic growth for the following years, their possible effects on the financial sector, the resulting growth trajectories and the expected changes of the mentioned factors.

**Present value calculation with the Free Cash Flow method**

The Bank calculated the expected cash flow for the given period based on the expected after-tax profit of the companies. The calculation is highly sensitive to the level of discount rate and growth rate used. As discount factor the Bank uses a zero coupon yield curve derived by the Headquarter Asset-Liability Management department. This zero coupon curve is estimated for each related country, based on the countries' issued bonds and segmented by the issuances' currencies.

The Bank calculated risk premiums on the basis of information from the country risk premiums that are published by Aswath Damodaran – New York STERN University, according to the Bank's assumption the risk-free interest rate includes the country-dependent risks in an implicit way.

When the subsidiary owns subordinated debt, the discount rate is calculated as a weighted average of the expected return on equity presented previously and the subordinated debt's interest rate. At the end of the calculation, the value of subordinated debt is subtracted from the valuations' result.

The growth rate in the explicit period is the growth rate of the profit after tax adjusted by the interest rate of the cash and subordinated loans. The assumed growth rates for the periods of residual values reflect the long-term economic expectations in case of every country.

The values of the subsidiaries in the FCF method were then calculated as the sum of the discounted cash flows of the explicit period, the present value of the terminal values and the initial free capital assuming an effective capital structure.

**Summary of the impairment test for the year ended 31 December 2025 and 2024**

Based on the valuations of the subsidiaries for the year ended 31 December 2024 no goodwill impairment was necessary to be recorded by the Group. For the year ended 31 December 2025 due to the sale of Georg d.o.o. HUF 196 million goodwill was written off and HUF 478 million goodwill impairment was booked for Home Solutions Llc.

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn) [continued]**

For the year ended 31 December 2025

Cost	Intangible assets	Goodwill	Property	Machinery and office equipment	Vehicle	Construction in progress	Tangible assets subject to operating lease	Total
Balance as at 1 January	663,314	71,308	458,328	330,713	44,898	51,442	41,520	1,661,523
Additions	259,488	-	56,227	54,689	5,902	73,767	25,361	475,434
Foreign currency translation differences	(12,281)	(2,464)	(13,011)	(8,468)	(477)	(1,489)	(3,855)	(42,045)
Disposals	(201,640)	(196)	(11,399)	(25,714)	(2,673)	(88,247)	(17,020)	(346,889)
<b>Closing balance</b>	<b><u>708,881</u></b>	<b><u>68,648</u></b>	<b><u>490,145</u></b>	<b><u>351,220</u></b>	<b><u>47,650</u></b>	<b><u>35,473</u></b>	<b><u>46,006</u></b>	<b><u>1,748,023</u></b>

Depreciation and amortization	Intangible assets	Property	Machinery and office equipment	Vehicle	Tangible assets subject to operating lease	Total
Balance as at 1 January	369,751	105,021	215,658	10,369	9,697	710,496
Charge for the period	76,995	14,822	39,670	2,854	6,045	140,386
Foreign currency translation differences	(7,997)	(3,019)	(5,592)	(184)	(1,094)	(17,886)
Disposals	(50,198)	(3,635)	(21,425)	(1,694)	(3,136)	(80,088)
<b>Closing balance</b>	<b><u>388,551</u></b>	<b><u>113,189</u></b>	<b><u>228,311</u></b>	<b><u>11,345</u></b>	<b><u>11,512</u></b>	<b><u>752,908</u></b>

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn) [continued]**

For the year ended 31 December 2025 [continued]

Impairment	Intangible assets	Goodwill	Property	Machinery and office equipment	Tangible assets subject to operating lease	Total
Balance as at 1 January	8,307	-	4,817	47	52	13,223
Impairment for the period	4,134	674	1,662	329	99	6,898
Release of impairment for the period	-	-	(465)	-	(126)	(591)
Foreign currency translation differences	(67)	-	(201)	(5)	(2)	(275)
Use of impairment	<u>(9,670)</u>	<u>(196)</u>	<u>(801)</u>	<u>(339)</u>	<u>(1)</u>	<u>(11,007)</u>
Closing balance	<u>2,704</u>	<u>478</u>	<u>5,012</u>	<u>32</u>	<u>22</u>	<u>8,248</u>

	Intangible assets	Goodwill	Property	Machinery and office equipment	Vehicle	Construction in progress	Tangible assets subject to operating lease	Total
<b>Carrying value</b>								
Balance as at 1 January	<u>285,256</u>	<u>71,308</u>	<u>348,490</u>	<u>115,008</u>	<u>34,529</u>	<u>51,442</u>	<u>31,771</u>	<u>937,804</u>
Closing balance	<u>317,626</u>	<u>68,170</u>	<u>371,944</u>	<u>122,877</u>	<u>36,305</u>	<u>35,473</u>	<u>34,472</u>	<u>986,867</u>
Fair values	=	=	<u>419,345</u>	<u>122,158</u>	<u>36,295</u>	=	<u>31,772</u>	<u>609,570</u>
Gross amount of the fully depreciated assets that are still in use	<u>80,361</u>	=	<u>11,541</u>	<u>130,781</u>	<u>1,191</u>	=	<u>1</u>	<u>223,875</u>

An analysis of the intangible assets for the year ended 31 December 2025 is as follows:

Intangible assets	Self-developed	Purchased	Total
Gross values	29,141	679,740	708,881
Accumulated amortization	(9,580)	(378,971)	(388,551)
Impairment	=	<u>(2,704)</u>	<u>(2,704)</u>
Carrying value	<u>19,561</u>	<u>298,065</u>	<u>317,626</u>

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn) [continued]****For the year ended 31 December 2025 [continued]**

Carrying value of the investment and goodwill allocated to the appropriate cash generating units

Subsidiaries	Carrying amounts of the subsidiary in HUF million	Goodwill values in HUF million	Goodwill values in million functional currency	Type of functional currency	Consolidated ownership interest	With ownership adjusted company value in HUF million	Applied long term grow rate	Applied long term discount rate
DSK Bank EAD (Bulgaria)	280,722	43,787	28,541 77	HUF BGN	99.92%	1,340,261	3.00%	11.40%
OTP banka d.d. (Croatia)	205,349	22,373	58	EUR	100.00%	563,814	3.00%	9.30%
POK-DSK Rodina a.d. (Bulgaria)	1,680	11	11	HUF	99.85%	24,739	3.00%	11.40%
OTP Invest Društvo AD (Serbia)	1,087	329	100	RSD	100.00%	1,087	3.00%	12.80%
Hello Pay Ltd. (Hungary)	1,690	508	508	HUF	100.00%	5,225	3.00%	14.70%
Aranykalász Group (Hungary)	15,012	342	342	HUF	100.00%	15,012	2.00%	12.50%
Szekszárd Group (Hungary)	<u>11,762</u>	<u>820</u>	820	HUF	100.00%	11,762	2.00%	12.50%
	<b><u>517,302</u></b>	<b><u>68,170</u></b>						

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn) [continued]**

For the year ended 31 December 2024

Cost	Intangible assets	Goodwill	Property	Machinery and office equipment	Vehicle	Construction in progress	Tangible assets subject to operating lease	Total
<b>Balance as at 1 January</b>	<b>542,735</b>	<b>66,932</b>	<b>421,607</b>	<b>276,542</b>	<b>41,931</b>	<b>45,897</b>	<b>36,624</b>	<b>1,432,268</b>
Additions	177,293	1,671	35,487	62,257	4,507	70,260	19,618	371,093
Foreign currency translation differences	12,813	2,705	14,279	7,357	250	2,222	2,056	41,682
Disposals	(69,527)	-	(13,045)	(15,443)	(1,790)	(66,937)	(16,778)	(183,520)
<b>Closing balance</b>	<b><u>663,314</u></b>	<b><u>71,308</u></b>	<b><u>458,328</u></b>	<b><u>330,713</u></b>	<b><u>44,898</u></b>	<b><u>51,442</u></b>	<b><u>41,520</u></b>	<b><u>1,661,523</u></b>

Depreciation and amortization	Intangible assets	Property	Machinery and office equipment	Vehicle	Tangible assets subject to operating lease	Total
<b>Balance as at 1 January</b>	<b>312,085</b>	<b>91,690</b>	<b>187,224</b>	<b>8,147</b>	<b>7,851</b>	<b>606,997</b>
Charge for the period	64,283	13,349	35,899	2,574	5,380	121,485
Foreign currency translation differences	7,340	3,208	5,357	137	668	16,710
Disposals	(13,957)	(3,226)	(12,822)	(489)	(4,202)	(34,696)
<b>Closing balance</b>	<b><u>369,751</u></b>	<b><u>105,021</u></b>	<b><u>215,658</u></b>	<b><u>10,369</u></b>	<b><u>9,697</u></b>	<b><u>710,496</u></b>

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn) [continued]**

For the year ended 31 December 2024 [continued]

Impairment	Intangible assets	Property	Machinery and office equipment	Tangible assets subject to operating lease	Total
Balance as at 1 January	6,224	4,476	46	43	10,789
Impairment for the period	4,930	509	250	105	5,794
Release of impairment for the period	-	(193)	-	(99)	(292)
Foreign currency translation differences	278	298	2	3	581
Use of impairment	(3,125)	(273)	(251)	-	(3,649)
<b>Closing balance</b>	<b><u>8,307</u></b>	<b><u>4,817</u></b>	<b><u>47</u></b>	<b><u>52</u></b>	<b><u>13,223</u></b>

	Intangible assets	Goodwill	Property	Machinery and office equipment	Vehicle	Construction in progress	Tangible assets subject to operating lease	Total
<b>Carrying value</b>								
Balance as at 1 January	<u>224,426</u>	<u>66,932</u>	<u>325,441</u>	<u>89,272</u>	<u>33,784</u>	<u>45,897</u>	<u>28,730</u>	<u>814,482</u>
Closing balance	<u>285,256</u>	<u>71,308</u>	<u>348,490</u>	<u>115,008</u>	<u>34,529</u>	<u>51,442</u>	<u>31,771</u>	<u>937,804</u>
Fair values	=	=	<u>383,507</u>	<u>112,665</u>	<u>34,569</u>	=	<u>31,754</u>	<u>562,495</u>
Gross amount of the fully depreciated assets that are still in use	<u>66,341</u>	=	<u>6,717</u>	<u>96,990</u>	<u>1,310</u>	=	=	<u>171,358</u>

An analysis of the intangible assets for the year ended 31 December 2024 is as follows:

Intangible assets	Self-developed	Purchased	Total
Gross values	22,771	640,543	663,314
Accumulated amortization	(9,225)	(360,526)	(369,751)
Impairment	=	(8,307)	(8,307)
<b>Carrying value</b>	<b><u>13,546</u></b>	<b><u>271,710</u></b>	<b><u>285,256</u></b>

**NOTE 13: PROPERTY, EQUIPMENT AND INTANGIBLE ASSETS (in HUF mn) [continued]****For the year ended 31 December 2024 [continued]**

Carrying value of the investment and goodwill allocated to the appropriate cash generating units

Subsidiaries	Carrying amounts of the subsidiary in HUF million	Goodwill values in HUF million	Goodwill values in million functional currency	Type of functional currency	Consolidated ownership interest	With ownership adjusted company value in HUF million	Applied long term grow rate	Applied long term discount rate
DSK Bank EAD (Bulgaria)	280,722	44,764	28,541 77	HUF BGN	99.92%	1,313,300	3.00%	11.70%
OTP banka d.d. (Croatia)	205,349	23,806	58	EUR	100.00%	584,207	3.00%	9.90%
POK-DSK Rodina a.d. (Bulgaria)	1,680	11	11	HUF	99.85%	23,645	3.00%	11.70%
George Consult (Croatia)	225	227	1	EUR	76.00%	171	3.00%	9.90%
OTP Home Solutions Llc. (Hungary)	4,810	478	478	HUF	100.00%	8,377	3.00%	14.42%
OTP Invest Drustvo AD (Serbia)	1,087	352	100	RSD	100.00%	1,087	3.00%	12.60%
Hello Pay Ltd. (Hungary)	1,640	508	508	HUF	100.00%	1,738	3.00%	14.60%
Aranykalász Group (Hungary)	15,012	342	342	HUF	75.00%	15,012	2.00%	12.50%
Szecsárd Group (Hungary)	<u>12,259</u>	<u>820</u>	820	HUF	100.00%	12,259	2.00%	12.50%
	<b><u>522,784</u></b>	<b><u>71,308</u></b>						

**NOTE 14: INVESTMENT PROPERTIES (in HUF mn)**

An analysis of the change in gross values of investment properties is as follows:

<b>Gross values</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
<b>Balance as at 1 January</b>	<b>99,563</b>	<b>63,552</b>
Increase due to transfer from inventories or owner-occupied properties	148	3,788
Increase from purchase	15,287	32,106
Increase due to transfer from held-for-sale properties	3	-
Transfer to held-for-sale properties	(231)	(231)
Transfer to inventories or owner-occupied properties	(65)	(983)
Disposal due to sale	(959)	(2,217)
Foreign currency translation difference	<u>(4,964)</u>	<u>3,548</u>
<b>Closing balance</b>	<b><u>108,782</u></b>	<b><u>99,563</u></b>

The applied depreciation and amortization rates were as follows:

	<b>31/12/2025</b>	<b>31/12/2024</b>
Depreciation and amortization rates	1.50% - 33.33%	1.49% - 50.00%

An analysis of the movement in the depreciation and amortization on investment properties is as follows:

<b>Depreciation and amortization</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
<b>Balance as at 1 January</b>	<b>11,284</b>	<b>9,008</b>
Additions due to transfer from inventories or owner-occupied properties	85	1,491
Charge for the period	1,625	1,047
Transfer to inventories or owner-occupied properties	-	(158)
Disposal due to sale	(307)	(699)
Transfer to held-for-sale properties	(28)	(13)
Foreign currency translation difference	<u>(613)</u>	<u>608</u>
<b>Closing balance</b>	<b><u>12,046</u></b>	<b><u>11,284</u></b>

An analysis of the movement in the impairment on investment properties is as follows:

<b>Impairment</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
<b>Balance as at 1 January</b>	<b>39</b>	<b>1,163</b>
Impairment for the period	3,733	7
Release of impairment for the period	(7)	(30)
Disposal due to sale	-	(1,179)
Transfer to held-for-sale properties	(4)	-
Decrease due to transfer to inventories or owner-occupied properties	-	(3)
Foreign currency translation difference	<u>(2)</u>	<u>81</u>
<b>Closing balance</b>	<b><u>3,759</u></b>	<b><u>39</u></b>

**NOTE 14: INVESTMENT PROPERTIES (in HUF mn) [continued]**

Carrying values	31/12/2025	31/12/2024
Balance as at 1 January	<u>88,240</u>	<u>53,381</u>
Closing balance	<u>92,977</u>	<u>88,240</u>
Fair values	<u>105,252</u>	<u>101,888</u>

There wasn't restriction on the realisability of investment property as at 31 December 2025 while it was HUF 839 million as at 31 December 2024.

The Group chose the cost model for measuring investment properties but estimates and reviews the fair value of the investment properties by external experts, these investment properties would have been presented on level 3 in the fair value hierarchy if the Group didn't apply cost method for this recognition.

Income and expenses	31/12/2025	31/12/2024
Rental income	5,568	4,027
Direct operating expenses of investment properties		
– income generating	996	486
Direct operating expenses of investment properties		
– non income generating	129	241

**NOTE 15: DERIVATIVE FINANCIAL ASSETS DESIGNATED AS HEDGE ACCOUNTING (in HUF mn)**

Positive fair value of derivative financial assets designated as fair value hedge

	31/12/2025	31/12/2024
CCIRS and mark-to-market CCIRS designated as fair value hedge	3,929	18,190
Interest rate swaps designated as fair value hedge	21,163	21,902
Interest rate swap designated as macro fair value hedge	<u>4,533</u>	<u>10,289</u>
<b>Total</b>	<b><u>29,625</u></b>	<b><u>50,381</u></b>

**NOTE 16: OTHER ASSETS (in HUF mn)**

Other assets are expected to be recovered or settled no more than twelve months after the reporting period.

	31/12/2025	31/12/2024
<b>Other financial assets</b>		
Receivables from card operations	51,807	39,740
Prepayments and accrued income on other financial assets	40,997	31,042
Trade receivables	52,805	49,978
Receivables from investment services	43,283	51,401
Other advances	63,816	56,729
Stock exchange deals	25,492	27,524
Giro clearing accounts	24,847	48,354
Receivables due from pension funds and investment funds	8,181	7,064
Receivables from leasing activities	1,469	1,651
Advances for securities and investments	869	556
Other financial assets	29,720	24,458
Loss allowance on other financial assets	<u>(54,906)</u>	<u>(46,177)</u>
<b>Total</b>	<b><u>288,380</u></b>	<b><u>292,320</u></b>
Other financial assets contain claims from overdue Russian government bonds, for further information please see details in Note 4. 1b.		
<b>Other non-financial assets</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Prepayments and accrued income on other non-financial assets	85,169	73,159
Receivables, subsidies from the State, Government	16,414	16,319
Settlement and suspense accounts	41,456	27,894
Biological assets and agricultural produce	12,745	11,297
Other non-financial assets	39,337	42,621
Impairment on other non-financial assets	<u>(5,328)</u>	<u>(5,176)</u>
<b>Total</b>	<b><u>189,793</u></b>	<b><u>166,114</u></b>
<b>Other assets (under IAS 2)</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Inventories	60,006	42,232
Repossessed real estate	13,797	17,763
Repossessed other non-financial assets	3,067	2,887
Write-down of the assets measured under IAS 2	<u>(7,653)</u>	<u>(7,128)</u>
<b>Total</b>	<b><u>69,217</u></b>	<b><u>55,754</u></b>
<b>Total other assets</b>	<b><u>547,390</u></b>	<b><u>514,188</u></b>

**NOTE 16: OTHER ASSETS (in HUF mn) [continued]**

An analysis of the movement in the loss allowance on **other financial assets** is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>46,177</b>	<b>34,602</b>
Loss allowance for the period	25,601	19,253
Release of allowance for the period	(9,670)	(8,847)
Use of loss allowance	(4,804)	(2,020)
Foreign currency translation difference	<u>(2,398)</u>	<u>3,189</u>
<b>Closing balance</b>	<b><u>54,906</u></b>	<b><u>46,177</u></b>

An analysis of the movement in the impairment on **other non-financial assets** is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>5,176</b>	<b>4,437</b>
Impairment for the period	654	1,316
Release of impairment for the period	(295)	(546)
Use of impairment	(433)	(41)
Foreign currency translation difference	<u>226</u>	<u>10</u>
<b>Closing balance</b>	<b><u>5,328</u></b>	<b><u>5,176</u></b>

**NOTE 17: AMOUNTS DUE TO BANKS, THE NATIONAL GOVERNMENTS, DEPOSITS FROM THE NATIONAL BANKS AND OTHER BANKS (in HUF mn)**

	31/12/2025	31/12/2024
Within one year		
In HUF	171,968	520,301
In foreign currency	<u>290,520</u>	<u>377,892</u>
	<b><u>462,488</u></b>	<b><u>898,193</u></b>
Over one year		
In HUF	243,230	312,107
In foreign currency	<u>785,203</u>	<u>811,891</u>
	<b><u>1,028,433</u></b>	<b><u>1,123,998</u></b>
<b>Total</b>	<b><u>1,490,921</u></b>	<b><u>2,022,191</u></b>

Interest rates on amounts due to banks, the National Governments, deposits from the National Banks and other banks are as follows:

	31/12/2025	31/12/2024
Within one year		
In HUF	(1.41)% - 6.10%	(1.51)% - 9.23%
In foreign currency	(2.02)% - 15.90%	(2.12)% - 18.00%
Over one year		
In HUF	(1.34)% - 6.50%	(1.41)% - 3.50%
In foreign currency	(2.00)% - 14.00%	(2.02)% - 13.50%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on amounts due to banks, the National Governments, deposits from the National Banks and other banks denominated in HUF	3.59%	3.10%
Average interest rates on amounts due to banks, the National Governments, deposits from the National Banks and other banks denominated in in foreign currency	8.48%	7.82%

**NOTE 18: REPO LIABILITIES (in HUF mn)**

	<b>31/12/2025</b>	<b>31/12/2024</b>
Within one year		
In HUF	50,093	23,736
In foreign currency	<u>116,665</u>	<u>108,401</u>
	<b><u>166,758</u></b>	<b><u>132,137</u></b>
Over one year		
In HUF	-	-
In foreign currency	<u>51</u>	=
	<b><u>51</u></b>	=
<b>Total</b>	<b><u>166,809</u></b>	<b><u>132,137</u></b>

Interest conditions on repo liabilities are as follows (%):

	<b>31/12/2025</b>	<b>31/12/2024</b>
Interest rates on repo liabilities denominated in HUF	5.40% - 6.10%	(4.50)% - 6.30%
Interest rates on repo liabilities denominated in foreign currency	0.50% - 3.35%	1.46% - 2.70%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on repo liabilities denominated in HUF	7.24%	7.70%
Average interest rates on repo liabilities denominated in foreign currency	0.80%	2.04%

**NOTE 19: FINANCIAL LIABILITIES DESIGNATED AT FAIR VALUE THROUGH PROFIT OR LOSS (in HUF mn)**

	31/12/2025	31/12/2024
Within one year		
In HUF	1,574	1,709
In foreign currency	=	=
	<b><u>1,574</u></b>	<b><u>1,709</u></b>
Over one year		
In HUF	88,766	70,781
In foreign currency	=	=
	<b><u>88,766</u></b>	<b><u>70,781</u></b>
<b>Total</b>	<b><u>90,340</u></b>	<b><u>72,490</u></b>
Contractual amount outstanding	<u>15,482</u>	<u>17,000</u>
Result from associated entity's measured at fair value attributable to the Group	<u>75,061</u>	<u>55,466</u>

Interest conditions of financial liabilities designated at fair value through profit or loss can be analysed as follows:

	31/12/2025	31/12/2024
Interest rates on financial liabilities designated at fair value denominated in HUF within one year	0.01% - 4.59%	4.33% - 8.24%
Interest rates on financial liabilities designated at fair value denominated in HUF over one year	4.32%-5.27%	3.14%

Certain MFB ("Hungarian Development Bank") refinanced loan receivables are categorised as fair value through profit or loss based on SPPI test. Related refinancing loans at the liability side are categorised as fair value through profit or loss based on fair value option due to accounting mismatch as provided by the IFRS 9 standard.

The Group controls capital funds where it does not hold the 100% of the owner rights. The related non-controlling interest is treated as financial liability designated at fair value through profit or loss as it is not considered equity under IAS 32.

**NOTE 20: DEPOSITS FROM CUSTOMERS (in HUF mn)**

	31/12/2025	31/12/2024
Within one year		
In HUF	8,934,369	8,452,289
In foreign currency	<u>24,219,565</u>	<u>22,752,752</u>
	<b><u>33,153,934</u></b>	<b><u>31,205,041</u></b>
Over one year		
In HUF	184,210	224,878
In foreign currency	<u>394,620</u>	<u>228,270</u>
	<b><u>578,830</u></b>	<b><u>453,148</u></b>
<b>Deposits from customers total</b>	<b><u>33,732,764</u></b>	<b><u>31,658,189</u></b>
<b>Fair value changes of the hedged items in portfolio hedge of interest rate risk</b>	<b><u>1,503</u></b>	<b><u>8,209</u></b>
<b>Total</b>	<b><u>33,734,267</u></b>	<b><u>31,666,398</u></b>

Interest rates on deposits from customers are as follows:

	31/12/2025	31/12/2024
Within one year		
In HUF	(0.20)% - 30.00%	0.00% - 17.50%
In foreign currency	(8.04)% - 13.50%	(0.85)% - 5.00%
Over one year		
In HUF	0.00% - 6.72%	0.00% - 6.03%
In foreign currency	0.00% - 23.00%	0.00% - 23.00%

	31/12/2025	31/12/2024
Average interest rates on deposits from customers denominated in HUF	1.72%	1.94%
Average interest rates on deposits from customers denominated in foreign currency	1.88%	1.43%

An analysis of deposits from customers by type is as follows:

	31/12/2025		31/12/2024	
Retail deposits	19,559,527	57.98%	17,967,496	56.75%
Corporate deposits	13,320,082	39.49%	12,538,696	39.61%
Municipality deposits	<u>853,155</u>	<u>2.53%</u>	<u>1,151,997</u>	<u>3.64%</u>
<b>Total</b>	<b><u>33,732,764</u></b>	<b><u>100.00%</u></b>	<b><u>31,658,189</u></b>	<b><u>100.00%</u></b>

**NOTE 21: LIABILITIES FROM ISSUED SECURITIES (in HUF mn)**

	31/12/2025	31/12/2024
With original maturity		
Within one year		
In HUF	148,378	103,595
In foreign currency	<u>30,309</u>	<u>163,970</u>
	<b><u>178,687</u></b>	<b><u>267,565</u></b>
Over one year		
In HUF	331,953	302,741
In foreign currency	<u>2,001,995</u>	<u>2,022,818</u>
	<b><u>2,333,948</u></b>	<b><u>2,325,559</u></b>
<b>Total</b>	<b><u>2,512,635</u></b>	<b><u>2,593,124</u></b>

Interest rates on liabilities from issued securities are as follows:

	31/12/2025	31/12/2024
Issued securities denominated in HUF	1.25% - 7.40%	1.25% - 12.00%
Issued securities denominated in foreign currency	1.63% - 20.50%	1.63% - 20.50%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on issued securities denominated in HUF	6.60%	6.05%
Average interest rates on issued securities denominated in foreign currency	5.74%	6.89%

**Issued securities denominated in HUF as at 31 December 2025 (in HUF mn)**

	Name	Date of issue	Maturity	Nominal value (in HUF mn)	Amortized cost (in HUF mn)	Interest conditions (actual interest rate in % p.a.)	
1	OTP_HUF_2026/2	15/12/2023	15/12/2026	551	553	fix	7.40
2	OTP_HUF_2026/3	17/01/2025	17/01/2026	10,728	11,352	fix	6.00
3	OTP_HUF_2026/4	31/01/2025	31/01/2026	4,023	4,248	fix	6.00
4	OTP_HUF_2026/5	14/02/2025	14/02/2026	4,713	4,965	fix	6.00
5	OTP_HUF_2026/6	14/03/2025	14/03/2026	12,015	12,603	fix	6.00
6	OTP_HUF_2026/7	11/04/2025	11/04/2026	17,132	17,893	fix	6.00
7	OTP_HUF_2026/8	09/05/2025	09/05/2026	13,579	14,119	fix	6.00
8	OTP_HUF_2026/9	06/06/2025	06/06/2026	12,530	12,971	fix	6.00
9	OTP_HUF_2026/10	27/06/2025	27/06/2026	7,638	7,880	fix	6.00
10	OTP_HUF_2026/11	16/07/2025	16/07/2026	11,302	11,626	fix	6.00
11	OTP_HUF_2026/12	15/08/2025	15/08/2026	<u>10,399</u>	<u>10,645</u>	fix	6.00
	<b>Subtotal</b>			<b><u>104,610</u></b>	<b><u>108,855</u></b>		

**NOTE 21: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]****Issued securities denominated in HUF as at 31 December 2025 (in HUF mn) [continued]**

Name	Date of issue	Maturity	Nominal value (in HUF mn)	Amortized cost (in HUF mn)	Interest conditions (actual interest rate in % p.a.)	
12	OTP_HUF_2026/13	12/09/2025	12/09/2026	6,786	6,915	fix 6.00
13	OTP_HUF_2026/14	10/10/2025	10/10/2026	11,703	11,872	fix 6.00
14	OTP_HUF_2026/15	31/10/2025	31/10/2026	5,164	5,221	fix 6.00
15	OTP_HUF_2026/16	21/11/2025	21/11/2026	7,469	7,526	fix 6.00
16	OTP_HUF26/17	12/12/2025	12/12/2026	6,754	6,782	fix 6.00
17	OTP_TBSZ_HUF_2028/1	13/10/2023	15/12/2028	155	156	fix 6.96
18	OJB2027_I <sup>1</sup>	23/07/2020	27/10/2027	76,850	72,751	fix 1.25
19	OJB2031_I <sup>1</sup>	18/08/2021	22/10/2031	82,000	68,082	fix 2.50
20	OJB2029_A	25/07/2022	24/05/2029	87,496	87,613	floating 6.75
21	OJB2029_B	10/04/2024	20/06/2029	59,167	59,312	floating 6.75
22	OJB2032_A	20/09/2023	24/11/2032	25,000	25,017	floating 6.75
23	OJB2032_B	22/09/2025	20/12/2032	20,000	20,029	floating 6.75
24	Other			<u>200</u>	<u>200</u>	
<b>Total issued securities in HUF</b>				<b><u>493,354</u></b>	<b><u>480,331</u></b>	

**Issued securities denominated in foreign currency as at 31 December 2025**

	Name	Date of issue	Maturity	Type of FX	Nominal value		Amortized cost		Interest conditions	
					(FX mn)	(HUF mn)	(FX mn)	(HUF mn)	(actual interest rate in % p.a.)	
1	XS2838495542 <sup>1</sup>	12/06/2024	12/06/2028	EUR	699	269,317	725	279,384	fix	4.75
2	XS2698603326 <sup>1</sup>	05/10/2023	05/10/2027	EUR	648	249,612	664	256,054	fix	6.13
3	XS2754491640 <sup>1</sup>	31/01/2024	31/01/2029	EUR	598	230,534	631	243,169	fix	5.00
4	XS2917468618 <sup>1</sup>	16/10/2024	16/10/2030	EUR	498	191,929	499	192,481	fix	4.25
5	XS2626773381 <sup>1</sup>	25/05/2023	25/05/2027	USD	499	163,869	503	165,316	fix	7.50
6	XS3102027383	30/06/2025	30/06/2028	CNY	900	42,291	915	42,980	fix	3.50
7	XS2871018136	31/07/2024	31/07/2027	CNY	300	14,097	305	14,338	fix	4.10
8	XS3094548123 <sup>1</sup>	20/06/2025	20/06/2030	EUR	430	165,722	436	166,506	fix	3.00
9	XS3187013779 <sup>1</sup>	01/10/2025	31/03/2031	EUR	500	192,700	499	190,805	fix	3.14
10	AL0022100187	26/12/2023	26/12/2030	EUR	7	2,875	7	2,884	fix	4.50
11	AL0022100302	20/11/2024	20/11/2031	EUR	3	1,303	3	1,312	fix	4.50
12	SI0022104176 <sup>1</sup>	25/05/2021	25/05/2027	EUR	176	67,715	175	67,518	fix	1.63
13	XS2793675534 <sup>1</sup>	03/04/2024	03/04/2028	EUR	300	115,620	312	120,358	fix	4.75
14	XS3050686321 <sup>1</sup>	20/05/2025	20/05/2028	EUR	300	115,620	305	117,450	fix	3.50
15	XS2808393370	22/04/2024	27/04/2027	UZS	1,370,220	37,407	1,407,726	38,431	fix	20.50
16	XS3200122102	09/10/2025	09/10/2028	UZS	1,200,000	32,760	1,241,431	33,891	fix	17.50
17	XS3200121716	09/10/2025	09/10/2030	USD	300	<u>98,526</u>	303	<u>99,427</u>	fix	6.45
<b>Total issued securities in FX</b>					<b><u>1,991,897</u></b>		<b><u>2,032,304</u></b>			
<b>Total issued securities</b>							<b><u>2,512,635</u></b>			

<sup>1</sup>: means hedged

**NOTE 21: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]****Issued securities denominated in HUF as at 31 December 2024 (in HUF mn)**

Name	Date of issue	Maturity	Nominal value (in HUF mn)	Amortized cost (in HUF mn)	Interest conditions (actual interest rate in % p.a.)	
1	OTP_HUF_2025/3	12/01/2024	12/01/2025	1,919	2,060	fix 7.50
2	OTP_HUF_2025/4	18/11/2022	18/11/2025	2,155	2,289	fix 6.75
3	OTP_HUF_2025/5	30/06/2023	30/06/2025	5,957	6,284	fix 6.50
4	OTP_HUF_2025/6	28/03/2024	28/03/2025	5,559	5,837	fix 6.50
5	OTP_HUF_2025/7	26/04/2024	26/04/2025	8,190	8,528	fix 6.00
6	OTP_HUF_2025/8	24/05/2024	24/05/2025	5,860	6,075	fix 6.00
7	OTP_HUF_2025/9	07/06/2024	07/06/2025	5,756	5,955	fix 6.00
8	OTP_HUF_2025/10	05/07/2024	05/07/2025	11,675	12,024	fix 6.00
9	OTP_HUF_2025/11	02/08/2024	02/08/2025	6,698	6,868	fix 6.00
10	OTP_HUF_2025/12	30/08/2024	30/08/2025	4,532	4,618	fix 5.50
11	OTP_HUF_2025/13	27/09/2024	27/09/2025	5,162	5,239	fix 5.50
12	OTP_HUF_2025/14	31/10/2024	31/10/2025	5,826	5,883	fix 5.50
13	OTP_HUF_2025/15	29/11/2024	29/11/2025	3,243	3,260	fix 5.50
14	OTP_HUF_2025/16	18/12/2024	18/12/2025	7,324	7,343	fix 6.00
15	OTP_HUF_2026/1 <sup>1</sup>	22/12/2022	05/01/2026	10,228	12,674	fix 12.00
16	OTP_HUF_2026/2	15/12/2023	15/12/2026	620	622	fix 7.40
17	OTP_TBSZ_HUF_2028/1	13/10/2023	15/12/2028	155	156	fix 6.88
18	OJB2025/II <sup>2</sup>	03/02/2020	26/11/2025	22,550	21,315	fix 1.50
19	OJB2027/I	23/07/2020	27/10/2027	76,850	67,875	fix 1.25
20	OJB2029/A	25/07/2022	24/05/2029	72,303	72,349	floating 6.75
21	OJB2029_B	10/04/2024	20/06/2029	60,037	60,170	floating 6.75
22	OJB2031/I	18/08/2021	22/10/2031	82,000	63,713	fix 2.50
23	OJB2032/A	20/09/2023	24/11/2032	25,000	24,995	floating 6.75
24	Other			<u>204</u>	<u>204</u>	
<b>Total issued securities in HUF</b>			<b><u>429,803</u></b>	<b><u>406,336</u></b>		

<sup>1</sup>: means hedged<sup>2</sup>: means partly hedged

**NOTE 21: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]****Issued securities denominated in foreign currency as at 31 December 2024**

	Name	Date of issue	Maturity	Type of FX	Nominal value		Amortized cost		Interest conditions	
					(FX mn)	(HUF mn)	(FX mn)	(HUF mn)	(actual interest rate in % p.a.)	
1	XS2871018136	31/07/2024	31/07/2027	CNY	300	16,176	300	16,443	fix	4.10
2	XS2560693181	01/12/2022	04/03/2026	EUR	648	265,938	649	282,387	fix	7.35
3	XS2642536671	27/06/2023	27/06/2026	EUR	110	45,110	110	46,871	fix	7.50
4	XS2698603326 <sup>1</sup>	05/10/2023	05/10/2027	EUR	649	266,321	664	276,203	fix	6.13
5	XS2737630314 <sup>1</sup>	22/12/2023	22/06/2026	EUR	75	30,757	75	31,845	fix	6.10
6	XS2754491640 <sup>1</sup>	31/01/2024	31/01/2029	EUR	598	245,420	607	260,169	fix	5.00
7	XS2838495542 <sup>1</sup>	12/06/2024	12/06/2028	EUR	698	286,058	710	298,861	fix	4.75
8	XS2917468618 <sup>1</sup>	16/10/2024	16/10/2030	EUR	499	204,680	500	206,807	fix	4.25
9	XS2703264635 <sup>1</sup>	13/10/2023	13/10/2026	RON	170	14,011	170	14,279	floating	8.10
10	XS2536446649	29/09/2022	29/09/2026	USD	60	23,616	60	24,063	fix	7.25
11	XS2626773381 <sup>1</sup>	25/05/2023	25/05/2027	USD	500	196,689	497	197,046	fix	7.50
12	AL0022100187	26/12/2023	26/12/2030	EUR	7	3,059	7	3,067	fix	4.50
13	AL0022100302	20/11/2024	20/11/2031	EUR	3	1,386	3	1,385	fix	4.50
14	SI0022104176 <sup>1</sup>	25/05/2021	25/05/2027	EUR	176	72,053	170	69,557	fix	1.63
15	XS2639027346 <sup>1</sup>	29/06/2023	29/06/2026	EUR	400	164,036	416	170,702	fix	7.38
16	XS2793675534 <sup>1</sup>	03/04/2024	03/04/2028	EUR	300	123,027	314	128,570	fix	4.75
17	XS2260457754	19/11/2020	19/11/2025	USD	300	118,080	294	115,787	fix	5.50
18	XS2808393370	22/04/2024	27/04/2027	UZS	1,370,220	<u>41,792</u>	1,401,497	<u>42,746</u>	fix	20.50
<b>Total issued securities in FX</b>						<b><u>2,118,209</u></b>		<b><u>2,186,788</u></b>		
<b>Total issued securities</b>								<b><u>2,593,124</u></b>		

<sup>1</sup>: means hedged**Hedge accounting of issued bonds**

Certain issued structured securities are hedged by the Group with interest rate swaps (“IRS”) which exchange the fixed and floating interest rate with the interest rate of the securities between the parties at a notional amount that equals the nominal amount of the hedged securities. These are considered as fair value hedge relationships as they cover the interest rate risk arising from the coupons of the hedged securities. OTP Group does not intend to be exposed to the risk embedded in the structured bonds, consequently as part of interest rate swap transaction the structured interest payments are swapped to floating interest rate.

This hedging relationship meets all of the following hedge effectiveness requirements:

- there is an economic relationship between the hedged item and the hedging instrument
- the effect of credit risk does not dominate the value changes that result from that economic relationship
- the hedge ratio of the hedging relationship is the same as that resulting from the quantity of the hedged item that the Group actually hedges and the quantity of the hedging instrument that the Group actually uses to hedge that quantity of hedged item

The cash flows of the fixed rate securities issued by the Bank are exposed to the changes in the HUF/EUR and HUF/USD foreign exchange rates and the volatility of the quoted interest rates of EUR and USD. The interest rate risk and foreign exchange risk related to these securities are hedged with EUR and USD IRS transactions, where the fixed interests were swapped to payments linked to 6-month BUBOR and EURIBOR and to floating interest rate based on USD overnight SOFR (“secured overnight financing rate”), resulting in a decrease in the interest rate and foreign exchange exposure of issued securities.

**NOTE 21: LIABILITIES FROM ISSUED SECURITIES (in HUF mn) [continued]****Term Note Program in the value of HUF 800 billion for the year of 2025/2026**

On 8 April 2025 the Bank initiated term note program in the value of HUF 800 billion with the intention of issuing registered dematerialized bonds in public. The NBH approved on 11 July 2025 the prospectus of Term Note Program. The prospectus is valid for 12 months following the disclosure. At the same time Term Note Program for the year 2024/2025 was closed, which was originally valid till 18 July 2025.

**Term Note Program in the value of HUF 800 billion for the year of 2024/2025**

On 30 April 2024 the Bank initiated term note program in the value of HUF 800 billion with the intention of issuing registered dematerialized bonds in public. The NBH approved on 19 July 2024 the prospectus of Term Note Program. The prospectus is valid for 12 months following the disclosure. At the same time Term Note Program for the year 2023/2024 was closed, which was originally valid till 7 August 2024.

**Term Note Program about issued securities denominated in foreign currency are detailed below:**

Types of Notes and Issuers	ISIN	Date of issuance	Type of FX	Nominal value (FX million)	Stock Exchange	Moody's	Scope Ratings GmbH	S&P
<b>OTP Bank Plc.</b>								
Senior Preferred Notes	XS2754491640	31/01/2024	EUR	600	Luxembourg	Baa3	BBB+	--
Green Senior Preferred Notes	XS2838495542	12/06/2024	EUR	700	Luxembourg	--	BBB+	BBB-
Senior Preferred Notes	XS2871018136	31/07/2024	CNY	300	Luxembourg	--	BBB+	--
Senior Preferred Notes	XS2917468618	16/10/2024	EUR	500	Luxembourg	Baa3	BBB+	--
Green Senior Preferred Notes	XS3102027383	30/06/2025	CNY	900	Luxembourg	--	BBB+	--
<b>OTP Mortgage Bank Ltd.</b>								
Mortgage bonds	XS3094548123	20/06/2025	EUR	430	Luxembourg	A1	--	--
Mortgage bonds	XS3187013779	01/10/2025	EUR	500	Luxembourg	A1	--	--
<b>OTP Albania SHA</b>								
Senior Non-Preferred Notes	AL0022100302	20/11/2024	EUR	3.38	Not listed	Not rated	Not rated	Not rated
<b>OTP banka d.d. (Slovenia)</b>								
Senior Preferred Notes	XS2793675534	03/04/2024	EUR	300	Luxembourg	Baa2	--	--
Senior Preferred Notes	XS3050686321	20/05/2025	EUR	300	Luxembourg	Baa2	--	--
<b>JSCMB 'Ipoteka Bank'</b>								
Senior Non-Preferred Notes	XS2808393370	22/04/2024	UZS	1,370,220	Vienna	--	--	BB-
Senior Unsecured	XS3200122102	09/10/2025	UZS	1,200,000	Vienna	--	--	BB-
Senior Unsecured	XS3200121716	09/10/2025	USD	300	Vienna	--	--	BB-

**Redemptions**

Types of Notes and Issuers	ISIN	Date of redemption	Type of FX	Nominal value (FX million)	Originally was due in
<b>OTP Bank Plc.</b>					
Senior Preferred Notes	XS2703264635	13/10/2025	RON	170	2026
Senior Preferred Notes	XS2560693181	04/03/2025	EUR	650	2026
Senior Non-Preferred Notes	XS2737630314	22/06/2025	EUR	75	2026
Senior Non-Preferred Notes	XS2642536671	27/06/2025	EUR	110	2026
Green Notes	XS2536446649	29/09/2025	USD	60	2026

**NOTE 22: DERIVATIVE FINANCIAL LIABILITIES HELD-FOR-TRADING (in HUF mn)**

Negative fair value of derivative financial liabilities held for trading by type of contracts

	31/12/2025	31/12/2024
Foreign exchange swaps held for trading	37,391	54,715
Commodity swaps	2,604	10,477
Interest rate swaps held for trading	19,032	24,406
Foreign exchange forward contracts held-for-trading	14,841	8,595
CCIRS and mark-to-market CCIRS held for trading	3,735	11,627
Held for trading option contracts	2,961	2,106
Other derivative transactions held for trading <sup>1</sup>	<u>701</u>	<u>2,163</u>
<b>Total</b>	<b><u>81,265</u></b>	<b><u>114,089</u></b>

<sup>1</sup> Other category includes: FX spot, equity swaps, forward rate and forward security agreement, options and index futures.

**NOTE 23: DERIVATIVE FINANCIAL LIABILITIES DESIGNATED AS HEDGE ACCOUNTING (in HUF mn)**

Negative fair value of derivative financial liabilities designated as hedge accounting by type of contracts

	31/12/2025	31/12/2024
CCIRS and mark-to-market CCIRS designated as fair value hedge	5,371	4,280
Interest rate swaps designated as fair value hedge	5,947	10,325
Interest rate swap designated as macro fair value hedge	<u>183</u>	-
<b>Total</b>	<b><u>11,501</u></b>	<b><u>14,605</u></b>

**NOTE 24: PROVISIONS AND OTHER LIABILITIES (in HUF mn)**

Other liabilities are expected to be recovered or settled no more than twelve months after the reporting period. Besides the total other liabilities mentioned above, which are expected to be recovered or settled more than twelve months after the reporting period are the following: accrued contractual liabilities, compulsory pension reserve, loans from government and liabilities from preferential dividend shares.

	31/12/2025	31/12/2024
<b>Other financial liabilities</b>		
Liabilities connected to Cafeteria benefits	111,588	103,883
Liabilities from investment services	74,283	149,317
Accrued expenses on other financial liabilities	77,809	63,792
Liabilities from card transactions	59,713	56,949
Accounts payable	82,090	99,594
Liabilities due to short positions	85,566	47,157
Giro clearing accounts	42,890	70,773
Advances received from customers	12,454	11,809
Liabilities from wages and other salary related payments	56,429	48,270
Loans from government	4,051	5,511
Dividend payable	2,227	1,518
Other financial liabilities	<u>108,393</u>	<u>109,356</u>
<b>Subtotal</b>	<b><u>717,493</u></b>	<b><u>767,929</u></b>
<b>Other non-financial liabilities</b>		
Clearing, settlement and pending accounts	58,184	84,731
Liabilities from social security contributions	20,477	17,240
Accrued expenses on other non-financial liabilities	36,722	33,173
Clearing account for advances on housing subsidies	11,674	12,333
Other non-financial liabilities	<u>85,644</u>	<u>76,146</u>
<b>Subtotal</b>	<b><u>212,701</u></b>	<b><u>223,623</u></b>
<b>Total</b>	<b><u>930,194</u></b>	<b><u>991,552</u></b>

**NOTE 24: PROVISIONS AND OTHER LIABILITIES (in HUF mn) [continued]**

The provisions are detailed as follows:

	31/12/2025	31/12/2024
Commitments and guarantees given	<u>54,892</u>	<u>50,477</u>
<b>Total provision according to IFRS 9</b>	<b><u>54,892</u></b>	<b><u>50,477</u></b>
Pending legal issues and tax litigation	36,774	39,867
Pensions and other retirement benefit obligations	12,731	10,659
Other long-term employee benefits	2,750	3,126
Restructuring	6,689	10,371
Other provision	<u>37,287</u>	<u>17,137</u>
<b>Total provision according to IAS 37</b>	<b><u>96,231</u></b>	<b><u>81,160</u></b>
<b>Total</b>	<b><u>151,123</u></b>	<b><u>131,637</u></b>

The movements of provisions according to IFRS 9 can be summarized as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>50,477</b>	<b>46,137</b>
Provision for the period	107,736	106,372
Release of provision for the period	(101,277)	(104,001)
Use of provision	(26)	(30)
Foreign currency translation differences	<u>(2,018)</u>	<u>1,999</u>
<b>Closing balance</b>	<b><u>54,892</u></b>	<b><u>50,477</u></b>

The movements of provisions according to IAS 37 can be summarized as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>81,160</b>	<b>74,982</b>
Provision for the period	45,847	21,871
Release of provision for the period	(17,310)	(16,803)
Use of provision	(9,084)	(6,001)
Change due to actuarial gains or losses related to employee benefits	326	1,012
Change due to acquisition	-	1,209
Unwinding of the discounted amount	20	24
Foreign currency translation differences	<u>(4,728)</u>	<u>4,866</u>
<b>Closing balance</b>	<b><u>96,231</u></b>	<b><u>81,160</u></b>

**NOTE 25: SUBORDINATED BONDS AND LOANS (in HUF mn)**

	31/12/2025	31/12/2024
Within one year		
In HUF	-	-
In foreign currency	<u>10,306</u>	<u>13,360</u>
	<b><u>10,306</u></b>	<b><u>13,360</u></b>
Over one year		
In HUF	-	-
In foreign currency	<u>475,778</u>	<u>355,999</u>
	<b><u>475,778</u></b>	<b><u>355,999</u></b>
<b>Total</b>	<b><u>486,084</u></b>	<b><u>369,359</u></b>

Types of subordinated bonds and loans are as follows:

	31/12/2025	31/12/2024
Debt securities issued	10,316	22,243
Loan received	<u>475,768</u>	<u>347,116</u>
<b>Total</b>	<b><u>486,084</u></b>	<b><u>369,359</u></b>

Interest rates on subordinated bonds and loans are as follows:

	31/12/2025	31/12/2024
Denominated in HUF	-	-
Denominated in foreign currency	0.00% - 8.75%	0.00% - 8.75%
	<b>31/12/2025</b>	<b>31/12/2024</b>
Average interest rates on subordinated bonds and loans denominated in foreign currency	8.36%	7.28%

Subordinated bonds and loans can be detailed as follows:

Type	Nominal value	Date of issuance	Date of maturity	Issue price	Interest conditions	Interest rate as at 31 December 2025
Subordinated bond	USD 647 million	2/15/2023	5/15/2033	99.417%	Fix 8.75%, annually	8.75%
Subordinated bond	USD 746 million	1/30/2025	7/30/2035	100.00%	Fix 7.30%, annually	7.30%
Subordinated loan	UZS 13,978.3 million	4/30/2019	11/10/2028	100.00%	Fix 3.00%, quarterly	3.00%
Subordinated loan	UZS 97,668.1 million	4/30/2019	11/10/2029	100.00%	Fix 3.00%, quarterly	3.00%
Subordinated loan	UZS 95,616.6 million	4/30/2019	11/10/2030	100.00%	Fix 3.00%, quarterly	3.00%
Subordinated loan	USD 25 million	3/30/2023	3/31/2030	100.00%	Fix 0.00%, quarterly	0.00%

**NOTE 26: SHARE CAPITAL (in HUF mn)**

	31/12/2025	31/12/2024
Authorized, issued and fully paid:		
Ordinary shares	28,000	28,000

Share capital is the portion of the Bank's equity that has been obtained by the issue of shares in the corporation to a shareholder, usually for cash.

The nominal value of the shares is HUF 100 per shares. All of the shares are ordinary shares representing the same rights to the shareholders. Furthermore, there are no restrictions on the distribution of dividends and the repayment of capital.

**NOTE 27: RETAINED EARNINGS AND RESERVES (in HUF mn)**

In 2025 dividend of HUF 270,000 million was paid out from the profit of the year 2024, which meant HUF 964.28 dividend per share payable to the shareholders. In 2026 dividend of HUF 300,000 million are expected to be proposed by the Management from the profit of the year 2025, which means HUF 1,071.43 dividend per share payable to the shareholders.

The retained earnings and reserves according to IFRS contains the retained earnings (HUF 553,117 million and HUF 639,228 million) and reserves (HUF 5,487,458 million and HUF 4,688,424 million) as at 31 December 2025 and 2024, respectively. The reserves include mainly the option reserve, other reserves, the fair value adjustment of financial instruments at fair value through other comprehensive income, share-based payment reserve, fair value of hedge transactions, changes in equity accumulated in the previous years at the subsidiaries and due to consolidation as well as translation of foreign exchange differences.

In the Consolidated Financial Statements, the Group recognizes the non-monetary items at historical cost. The difference between the historical cost of the non-monetary items in HUF amount and the translated foreign currencies into the presentation currency using the exchange rate at the balance sheet date, is presented in the shareholders' equity as a translation difference. The accumulated amounts of exchange differences were HUF 16,280 million and HUF 232,227 million as at 31 December 2025 and 2024, respectively.

**Retained earnings**

Profit of previous years generated by the Group that are not distributed to shareholders as dividends.

**Other reserves**

The other reserves contain separated reserves due to statutory provisions.

**Option reserve**

OTP Bank Plc and MOL Plc entered into a share swap agreement in 16 April 2009, whereby OTP has changed 24,000,000 OTP ordinary shares for 5,010,501 „A series” MOL shares. The amended final maturity of the share swap agreement is 11 July 2027, until which any party can initiate cash or physical settlement of the transaction. Option reserve represents the written put option over OTP ordinary shares that are deducted from equity at the date of OTP-MOL share swap transaction.

**Share-based payment reserve**

Share-based payment reserve represents the increase in the equity due to the goods or services were received by the Bank in an equity-settled share-based payment transaction, valued at the fair value of the goods or services received (see details in Note 40).

**Other comprehensive income**

Other comprehensive income comprises items of income and expense (including reclassification adjustments) that are not recognized in profit or loss as required or permitted by other IFRSs.

**Net investment hedge in foreign operations**

Reserve presented as net investment hedge in foreign operations in the shareholders' equity is related to OTP Luxembourg S.à r.l., OTP banka d.d. (Croatia) and Crnogorska komercijalna banka a.d.

**NOTE 27: RETAINED EARNINGS AND RESERVES (in HUF mn) [continued]****Changes in equity accumulated in the previous year at the subsidiaries and due to consolidation**

The accumulated changes at the subsidiaries contain the accumulated gains and losses of the subsidiaries from the first day when they were included in the consolidation process. The changes due to consolidation contain the effect on the result of the eliminations in the consolidation process of the previous years.

	31/12/2025	31/12/2024
Retained earnings	553,117	639,228
Capital reserve	52	52
Option reserve	(55,468)	(55,468)
Other reserves	336,203	273,280
Actuarial loss related to employee defined benefits	(1,078)	(779)
Fair value of financial instruments measured at fair value through other comprehensive income	21,675	14,559
Share-based payment reserve	62,204	56,813
Net investment hedge in foreign operations	(32,733)	(57,423)
Profit after income tax	1,140,698	1,071,913
Changes in equity accumulated in the previous year at the subsidiaries and due to consolidation	3,999,625	3,153,250
Foreign currency translation differences	<u>16,280</u>	<u>232,227</u>
<b>Retained earnings and other reserves<sup>1</sup></b>	<b><u>6,040,575</u></b>	<b><u>5,327,652</u></b>

<sup>1</sup>See more details in the Consolidated Statement of Comprehensive Income and in the Consolidated Statement of Changes in Equity.

**Fair value adjustment of securities at fair value  
through other comprehensive income**

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>(79,330)</b>	<b>(86,397)</b>
Change of fair value	16,684	5,237
Deferred tax related to change of fair value	(1,699)	2,921
Transfer to profit or loss due to derecognition	410	342
Deferred tax related to transfer to profit or loss	(6)	58
Disposal due to asset held-for-sale	-	817
Foreign currency translation difference	<u>540</u>	<u>(2,308)</u>
<b>Closing balance</b>	<b><u>(63,401)</u></b>	<b><u>(79,330)</u></b>

**Expected credit loss on securities at fair value  
through other comprehensive income**

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>60,890</b>	<b>34,573</b>
Increase of loss allowance	9,115	31,706
Release of loss allowance	(10,974)	(1,858)
Deferred tax effect	894	(7,160)
Disposal due to asset held-for-sale	-	(139)
Foreign currency translation difference	<u>(7,791)</u>	<u>3,768</u>
<b>Closing balance</b>	<b><u>52,134</u></b>	<b><u>60,890</u></b>

**NOTE 27: RETAINED EARNINGS AND RESERVES (in HUF mn) [continued]****Fair value changes of equity instruments****at fair value through other comprehensive income**

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>32,999</b>	<b>18,595</b>
Change of fair value	890	16,736
Deferred tax related to change of fair value	(211)	(2,115)
Disposal due to asset held-for-sale	-	(740)
Foreign currency translation difference	<u>(736)</u>	<u>523</u>
<b>Closing balance</b>	<b><u>32,942</u></b>	<b><u>32,999</u></b>

**Net investment hedge in foreign operations**

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>(57,423)</b>	<b>(30,113)</b>
Change of fair value on hedging item	<u>24,690</u>	<u>(27,310)</u>
<b>Closing balance</b>	<b><u>(32,733)</u></b>	<b><u>(57,423)</u></b>

**Actuarial loss related to defined employee benefits**

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>(779)</b>	<b>144</b>
Change of actuarial loss related to employee benefits	(326)	(1,012)
Deferred tax related to change of actuarial loss related to employee benefits	24	26
Foreign currency translation difference	<u>3</u>	<u>63</u>
<b>Closing balance</b>	<b><u>(1,078)</u></b>	<b><u>(779)</u></b>

**Foreign currency translation difference**

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>232,227</b>	<b>37,600</b>
Change of foreign currency translation	<u>(215,947)</u>	<u>194,627</u>
<b>Closing balance</b>	<b><u>16,280</u></b>	<b><u>232,227</u></b>

**NOTE 28: TREASURY SHARES (in HUF mn)**

	31/12/2025	31/12/2024
Nominal value (Ordinary shares)	2,613	1,901
Carrying value at acquisition cost	458,637	245,319

The changes in the carrying value of treasury shares are due to repurchase and sale transactions on market authorised by the General Assembly.

Change in number of shares:

	31/12/2025	31/12/2024
<b>Number of shares as at 1 January</b>	<b>19,011,319</b>	<b>12,666,770</b>
Additions	9,746,124	8,775,919
Disposals	<u>(2,630,484)</u>	<u>(2,431,370)</u>
<b>Closing number of shares</b>	<b><u>26,126,959</u></b>	<b><u>19,011,319</u></b>

Change in carrying value:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>245,319</b>	<b>120,489</b>
Additions	249,744	153,105
Disposals	<u>(36,426)</u>	<u>(28,275)</u>
<b>Closing balance</b>	<b><u>458,637</u></b>	<b><u>245,319</u></b>

**NOTE 29: NON-CONTROLLING INTEREST (in HUF mn)**

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>9,680</b>	<b>7,960</b>
Increase due to business combination	2,538	-
Non-controlling interest included in net profit for the period	5,627	4,227
Dividend paid to non-controlling interest	(2,252)	(2,643)
Purchase of non-controlling interest	(72)	(350)
Foreign currency translation difference	<u>157</u>	<u>486</u>
<b>Closing balance</b>	<b><u>15,678</u></b>	<b><u>9,680</u></b>

The non-controlling interest is not significant in respect of the whole OTP Group.

**NOTE 30: INTEREST INCOME, INCOME SIMILAR TO INTEREST INCOME AND INTEREST EXPENSE (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Interest income calculated using the effective interest method from / on</b>		
loans	1,773,634	1,584,771
securities at amortized cost	355,461	352,733
finance lease receivables	113,822	110,830
securities at fair value through other comprehensive income	70,962	60,806
banks and balances with the National Banks	236,159	171,238
placements with other banks	199,527	240,932
financial liabilities (negative interest expense)	251	492
repo receivables	<u>24,410</u>	<u>20,336</u>
<b>Subtotal</b>	<b><u>2,774,226</u></b>	<b><u>2,542,138</u></b>
<b>Income similar to interest income from</b>		
swap deals related to credit institutions	382,246	385,122
loans mandatorily at fair value through profit or loss	126,858	99,559
swap deals related to clients	49,719	40,359
rental income	16,116	13,479
non-trading instruments mandatorily at fair value through profit or loss	<u>15</u>	<u>1,465</u>
<b>Subtotal</b>	<b><u>574,954</u></b>	<b><u>539,984</u></b>
<b>Total interest income and incomes similar to interest income</b>	<b><u>3,349,180</u></b>	<b><u>3,082,122</u></b>
	Year ended 31 December 2025	Year ended 31 December 2024
<b>Interest expense due to / from / on</b>		
swaps related to banks, National Governments and to deposits from the National Banks	402,506	412,274
deposits from customers	605,361	460,991
swaps related to deposits from customers banks, National Governments and on deposits from the National Banks	73,780	120,223
issued securities	120,937	123,373
subordinated and supplementary bonds and loans	136,190	157,008
financial assets (negative interest income)	40,924	35,471
depreciation of assets subject to operating lease and investment properties	194	4,719
leases	7,667	6,427
repo liabilities	4,053	3,557
other	15,527	11,049
	<u>1,469</u>	<u>1,690</u>
<b>Total interest expense</b>	<b><u>1,408,608</u></b>	<b><u>1,336,782</u></b>

**NOTE 31: LOSS ALLOWANCES / IMPAIRMENT / PROVISIONS (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Loss allowance on loans</b>		
Loss allowance for the period	740,013	723,674
Release of loss allowance	(544,254)	(589,629)
from this: impairment gain	(5,685)	(8,956)
Income from loan recoveries	(41,532)	(57,110)
<i>Income from recoveries exceeding the gross loans</i>	(6,244)	(8,956)
<i>Impairment gain</i>	(20,960)	(33,939)
<i>Income from loss allowance on loans before OTP acquisition</i>	(381)	(978)
<i>Income from recoveries of written-off, but     legally existing loans</i>	(13,947)	(13,237)
Change in the fair value attributable to changes in the credit risk of loans mandatorily measured at fair value through profit of loss	(111)	(5,504)
Loss allowance on finance lease	21,126	30,347
Release of loss allowance on finance lease	<u>(20,997)</u>	<u>(36,865)</u>
	<b><u>154,245</u></b>	<b><u>64,913</u></b>
<b>Loss allowance / (Release of loss allowance) on due from banks, balances with National Banks</b>		
Loss allowance for the period	4,021	5,072
Release of loss allowance	<u>(3,561)</u>	<u>(4,332)</u>
	<b><u>460</u></b>	<b><u>740</u></b>
<b>placements</b>		
Loss allowance for the period	4,910	7,207
Release of loss allowance	<u>(4,770)</u>	<u>(5,904)</u>
	<b><u>140</u></b>	<b><u>1,303</u></b>
<b>repo receivables</b>		
Loss allowance for the period	3,942	1,839
Release of loss allowance	<u>(3,453)</u>	<u>(1,914)</u>
	<b><u>489</u></b>	<b><u>(75)</u></b>
<b>Subtotal</b>	<b><u>1,089</u></b>	<b><u>1,968</u></b>
<b>Total</b>	<b><u>155,334</u></b>	<b><u>66,881</u></b>

**NOTE 31: LOSS ALLOWANCES / IMPAIRMENT / PROVISIONS (in HUF mn) [continued]**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Loss allowance / (Release of loss allowance) on securities at fair value through other comprehensive income</b>		
Loss allowance for the period	9,115	31,706
Release of loss allowance	<u>(10,974)</u>	<u>(1,858)</u>
	<b><u>(1,859)</u></b>	<b><u>29,848</u></b>
<b>securities at amortized cost</b>		
Loss allowance for the period	12,694	25,766
Release of loss allowance	<u>(18,252)</u>	<u>(15,707)</u>
	<b><u>(5,558)</u></b>	<b><u>10,059</u></b>
<b>Subtotal</b>	<b><u>(7,417)</u></b>	<b><u>39,907</u></b>
<b>Impairment / (Release of impairment) on intangible, tangible assets subject to operating lease</b>		
Impairment for the period	99	105
Release of impairment	<u>(126)</u>	<u>(99)</u>
	<b><u>(27)</u></b>	<b><u>6</u></b>
<b>investment properties</b>		
Impairment for the period	3,733	7
Release of impairment	<u>(7)</u>	<u>(30)</u>
	<b><u>3,726</u></b>	<b><u>(23)</u></b>
<b>Subtotal</b>	<b><u>3,699</u></b>	<b><u>(17)</u></b>
<b>Provision on commitments and guarantees given</b>		
Provision for the period	107,736	106,372
Release of provision	<u>(101,277)</u>	<u>(104,001)</u>
<b>Subtotal</b>	<b><u>6,459</u></b>	<b><u>2,371</u></b>
<b>Total loss allowances, impairment and provisions</b>	<b><u>158,075</u></b>	<b><u>109,142</u></b>

**NOTE 32: NET PROFIT FROM FEES AND COMMISSIONS (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Income from fees and commissions</b>		
<b>Fees and commissions related to lending<sup>1</sup></b>	<b><u>62,533</u></b>	<b><u>54,057</u></b>
Deposit and account maintenance fees and commissions	431,652	354,823
Fees and commissions related to the issued bank cards	244,596	198,040
Currency exchange gains and losses	258,409	177,228
Fees related to cash withdrawal	75,883	72,890
Fees and commissions related to security trading	66,798	46,227
Fees and commissions related to fund management	67,223	59,251
Insurance fee income	29,782	25,701
Other	<u>38,642</u>	<u>57,770</u>
<b>Fees and commissions from contracts with customers</b>	<b><u>1,212,985</u></b>	<b><u>991,930</u></b>
<b>Total</b>	<b><u>1,275,518</u></b>	<b><u>1,045,987</u></b>

<sup>1</sup> Fees and commissions related to lending aren't included in the effective interest rate calculation due to their nature.

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Expense from fees and commissions</b>		
Fees and commissions related to issued bank cards	101,022	84,357
Interchange fees	49,457	44,349
Fees and commissions paid on loans	15,336	12,477
Business related SMS fee expense	13,811	-
Fees and commissions related to deposits	12,524	11,644
Cash withdrawal transaction fees	8,066	8,607
Fees and commissions related to security trading	7,978	7,344
Insurance fees	2,741	2,117
Fees and commissions related to collection of loans	1,063	665
Postal fees	4,333	4,706
Money market transaction fees and commissions	2,230	1,128
Other agent fee	2,481	2,014
Other	<u>28,229</u>	<u>23,924</u>
<b>Total</b>	<b><u>249,271</u></b>	<b><u>203,332</u></b>
<b>Net profit from fees and commissions</b>	<b><u>1,026,247</u></b>	<b><u>842,655</u></b>

**NOTE 33: GAINS AND LOSSES BY TRANSACTIONS (in HUF mn)**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Gains and losses by transactions</b>		
Gain by transactions	8,276	6,473
Loss by transactions	<u>(6,947)</u>	<u>(11,215)</u>
<b>Gain / (Loss) from derecognition of loans, placements, finance lease</b>	<b><u>1,329</u></b>	<b><u>(4,742)</u></b>
Gain by transactions	1,087	826
Loss by transactions	<u>(3,115)</u>	<u>(10,493)</u>
<b>Loss from derecognition of securities and other receivables at amortized cost</b>	<b><u>(2,028)</u></b>	<b><u>(9,667)</u></b>
<b>Loss from derecognition of financial assets at amortized cost</b>	<b><u>(699)</u></b>	<b><u>(14,409)</u></b>

Derecognition of financial assets is mainly related to sale transactions both in case of securities and loans due to better investment options related to short-term opportunities on the market.

Foreign exchange result consists of revaluation difference from converting assets and liabilities in foreign currencies into the presentation currency of the consolidation financial statements.

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Gains and losses by transactions</b>		
Gain by transactions	28,195	17,879
Loss by transactions	<u>(5,474)</u>	<u>(5,761)</u>
<b>FX gain on securities at fair value through profit or loss</b>	<b><u>22,721</u></b>	<b><u>12,118</u></b>
Gain by transactions	30	10
Loss by transactions	<u>(303)</u>	<u>(325)</u>
<b>FX loss on derecognition of investment in subsidiaries, associates</b>	<b><u>(273)</u></b>	<b><u>(315)</u></b>
Gain by transactions	1,871	97
Loss by transactions	<u>(2,310)</u>	<u>(1,574)</u>
<b>FX loss on securities at fair value through other comprehensive income</b>	<b><u>(439)</u></b>	<b><u>(1,477)</u></b>
<b>Gain on securities, net</b>	<b><u>22,009</u></b>	<b><u>10,326</u></b>

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Gains and losses by transactions</b>		
Gain by transactions	26,977	8,607
Loss by transactions	<u>(5,024)</u>	<u>(2,564)</u>
<b>Gain on non-trading securities mandatorily at fair value through profit or loss</b>	<b><u>21,953</u></b>	<b><u>6,043</u></b>
Gain by transactions	67,656	75,057
Loss by transactions	<u>(73,848)</u>	<u>(51,726)</u>
<b>(Loss) / Gain on loans mandatorily at fair value through profit or loss (adjustment resulting from change in market factors)</b>	<b><u>(6,192)</u></b>	<b><u>23,331</u></b>
Gain by transactions	1,172	2,236
Loss by transactions	<u>(8,655)</u>	<u>(4,236)</u>
<b>Loss on financial assets and liabilities designated at fair value through profit or loss</b>	<b><u>(7,483)</u></b>	<b><u>(2,000)</u></b>
<b>Fair value adjustment on financial instruments measured at fair value through profit or loss</b>	<b><u>8,278</u></b>	<b><u>27,374</u></b>

**NOTE 33: GAINS AND LOSSES BY TRANSACTIONS (in HUF mn) [continued]**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Gains and losses by transactions</b>		
Gain by transactions	64,119	90,509
Loss by transactions	<u>(67,691)</u>	<u>(79,333)</u>
<b>(Loss) / Gain from FX swap, swap and option deals</b>	<b><u>(3,572)</u></b>	<b><u>11,176</u></b>
Gain by transactions	7,154	5,593
Loss by transactions	<u>(5,884)</u>	<u>(5,373)</u>
<b>Gain from option deals</b>	<b><u>1,270</u></b>	<b><u>220</u></b>
Gain by transactions	413,139	382,306
Loss by transactions	<u>(412,514)</u>	<u>(381,537)</u>
<b>Gain from commodities deals</b>	<b><u>625</u></b>	<b><u>769</u></b>
Gain by transactions	2,810	473
Loss by transactions	<u>(2,449)</u>	<u>(634)</u>
<b>Gain / (Loss) from futures deals</b>	<b><u>361</u></b>	<b><u>(161)</u></b>
<b>Net results on derivative instruments and hedge relationships</b>	<b><u>(1,316)</u></b>	<b><u>12,004</u></b>

Gains and losses attributable to the hedged risk on the hedged item and on the hedging instruments and ineffectiveness in case of fair value hedge on amortised cost line items are as follows:

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Fair value hedge</b>		
Hedged items	1,681	(28,937)
Hedging instrument	(727)	38,549
Hedge ineffectiveness	954	9,612

**NOTE 34: OTHER OPERATING INCOME AND EXPENSES AND OTHER ADMINISTRATIVE EXPENSES (in HUF mn)**

<b>Other operating income</b>	<b>Year ended 31 December 2025</b>	<b>Year ended 31 December 2024</b>
Income from agricultural activity	94,037	86,486
Income from tourism activity	4,355	4,042
Gains on transactions related to property activities	7,473	15,918
Rental income	2,100	2,607
Income from computer programming	1,615	1,962
Fair value adjustment of biological assets and agricultural produce	(2,564)	(2,343)
Income from written-of receivable	5,504	4,996
Income from air passenger transport	2,123	2,151
Gains on transactions related to insurance activity	3,376	2,696
Non-repayable assets received	3,302	1,039
Other income from non-financial activities	<u>22,809</u>	<u>28,341</u>
<b>Total</b>	<b><u>144,130</u></b>	<b><u>147,895</u></b>

<b>Other operating expenses</b>	<b>Year ended 31 December 2025</b>	<b>Year ended 31 December 2024</b>
Expense related to agricultural activity	71,263	65,461
Provision for off-balance sheet commitments and contingent liabilities	28,537	5,068
Financial support for sport association and organization of public utility	3,206	14,492
Loss allowance and loan losses on other financial assets	15,939	9,948
(Release of impairment) / Impairment on investments <sup>1</sup>	(386)	957
Non-repayable assets contributed	1,664	2,204
Impairment of right-of-use assets	-	1,833
Impairment on tangible and intangible assets	5,660	5,496
Impairment and loan losses on other non-financial assets and assets measured under IAS 2	1,519	3,218
Operating expenses of assets subject to operating lease and investment property	1,578	1,114
Other	23,817	17,383
<i>Other expenses from non-financial activities</i>	<i>12,261</i>	<i>7,177</i>
<i>Other costs</i>	<i><u>11,556</u></i>	<i><u>10,206</u></i>
<b>Total</b>	<b><u>152,797</u></b>	<b><u>127,174</u></b>

<sup>1</sup> See details in Note 12.

**NOTE 34: OTHER OPERATING INCOME AND EXPENSES AND OTHER ADMINISTRATIVE EXPENSES (in HUF mn) [continued]**

	Year ended 31 December 2025	Year ended 31 December 2024
<b>Other administrative expenses</b>		
<b>Personnel expenses</b>		
Wages	490,763	426,083
Taxes related to personnel expenses	77,847	69,612
Other personnel expenses	<u>61,666</u>	<u>54,480</u>
<b>Subtotal</b>	<b><u>630,276</u></b>	<b><u>550,175</u></b>
<b>Depreciation, amortization of tangible, intangible assets, right-of-use assets<sup>2</sup></b>	<b><u>153,126</u></b>	<b><u>134,293</u></b>
<b>Other administrative expenses</b>		
Taxes, other than income tax <sup>3</sup>	272,714	171,961
Services	213,738	202,510
Professional fees	39,268	34,131
Fees payable to authorities and other fees	62,564	57,542
Advertising	48,198	38,835
Administration expenses	15,613	16,792
Rental fees	<u>7,143</u>	<u>6,535</u>
<b>Subtotal</b>	<b><u>659,238</u></b>	<b><u>528,306</u></b>
<b>Total</b>	<b><u>1,442,640</u></b>	<b><u>1,212,774</u></b>

<sup>2</sup> See details in Note 13 and Note 36.

<sup>3</sup> Special tax of financial institutions was paid by the Group in the amount of HUF 97,504 million for the year ended 31 December 2025 and HUF 39,711 million for the year ended 31 December 2024, recognized as an expense thus decreased the corporate tax base. For the year ended 31 December 2025 financial transaction duty was paid by the Bank in the amount of HUF 162,333 million while for the year ended 31 December 2024 the same duty was HUF 122,434 million.

	Year ended 31 December 2025	Year ended 31 December 2024
	In thousand EUR	
<b>Ernst &amp; Young Audit Ltd.</b>		
OTP Bank Plc. – annual audit – separate financial statements	658	600
OTP Bank Plc. – annual audit – consolidated financial statements	1,626	967
Other audit services based on statutory provisions to OTP Group members	1,381	1,477
Other services providing assurance	4,339	3,231
Other non-audit services	<u>832</u>	<u>662</u>
<b>Total</b>	<b><u>8,836</u></b>	<b><u>6,937</u></b>

	Year ended 31 December 2025	Year ended 31 December 2024
	In thousand EUR	
<b>Ernst &amp; Young Network</b>		
Audit based on statutory provisions	3,127	3,214
Other services providing assurance	744	-
Tax consulting services	294	205
Other non-audit services	<u>412</u>	<u>196</u>
<b>Total</b>	<b><u>4,577</u></b>	<b><u>3,615</u></b>

**NOTE 35: INCOME TAXES (in HUF mn)**

The Group is presently liable for income tax at rates between 9% and 35% of taxable income.

Deferred tax is calculated at the income tax rate of 9% in Hungary and Montenegro, 10% in Bulgaria, 12% in Moldova and Cyprus, 15% in Serbia and Albania, 18% in Croatia, 19% in the Netherlands, 20% in Uzbekistan, 22% in Slovenia, 25% in Ukraine and Russia and 35% in Malta.

The breakdown of the income tax expense is:

	31/12/2025	31/12/2024
Current tax expense	278,045	259,188
Deferred tax income	(23,119)	(5,748)
<b>Total</b>	<b><u>254,926</u></b>	<b><u>253,440</u></b>

A reconciliation of the net deferred tax asset is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>23,946</b>	<b>27,028</b>
Deferred tax income in profit or loss	23,119	5,748
Deferred tax liability related to items recognized directly in equity and in Comprehensive Income	(1,378)	(8,673)
Due to acquisition of subsidiary	-	(80)
Foreign currency translation difference	2,240	(77)
<b>Closing balance</b>	<b><u>47,927</u></b>	<b><u>23,946</u></b>

A breakdown of the deferred tax assets are as follows:

	31/12/2025	31/12/2024
Loss allowance on granted loans	34,311	27,657
Provision for off-balance sheet commitments and contingent liabilities, derivative financial instruments	7,002	6,226
Securities at amortized cost	603	949
Difference in depreciation of tangible assets, tangible assets subject to operating lease	3,845	1,679
Fair value adjustment of non-trading instruments mandatorily at fair value through profit or loss	1,115	1,064
Fair value adjustment of derivative financial instruments	1,290	9,036
Provision on other financial, non-financial liabilities	1,694	1,195
Fair value adjustment of securities at fair value through other comprehensive income	2,134	2,856
Unused tax allowance	2	-
Loss allowance / impairment on other financial, non-financial assets	17,378	9,558
Tax accrual caused by negative taxable income	29,232	30,189
Difference in depreciation of right-of-use assets	349	244
Loss allowance on investment	24	113
Repurchase agreement and security lending	1	1
Cash, amounts due from banks, balances with the National Banks interbank placements and receivables	235	192
Difference in accounting for investment properties	139	155
Issued securities	80	1,140
Other	<u>10,598</u>	<u>7,421</u>
<b>Deferred tax asset</b>	<b><u>110,032</u></b>	<b><u>99,675</u></b>

**NOTE 35: INCOME TAXES (in HUF mn) [continued]**

A breakdown of the deferred tax liabilities are as follows:

	31/12/2025	31/12/2024
Difference in depreciation of tangible assets, tangible assets subject to operating lease	(14,825)	(16,042)
Fair value adjustment of securities at fair value through other comprehensive income	(6,862)	(15,089)
Fair value adjustment of securities at fair value through profit or loss	(2,200)	(2,376)
Loss allowance on investment	(1,582)	(1,751)
Fair value adjustment of non-trading instruments mandatorily at fair value though profit or loss	(1,394)	(1,374)
Securities at amortized cost	(2,591)	(3,742)
Provision for off-balance sheet commitments and contingent liabilities, derivative financial instruments	(713)	(531)
Loss allowance on granted loans	(3,401)	(2,462)
Cash, amounts due from banks, balances with the National Banks interbank placements and receivables	(2,295)	(1,478)
Fair value adjustment of derivative financial instruments	(119)	-
Loss allowance / impairment on other financial, non-financial assets	(100)	(1,883)
Repurchase agreement and security lending	(18)	(13)
Provision on other financial, non-financial liabilities	(298)	(2,225)
Difference in accounting for investment properties	(2,552)	(2,442)
Difference in depreciation of right-of-use assets	(963)	(374)
Other	<u>(22,192)</u>	<u>(23,947)</u>
<b>Deferred tax liabilities</b>	<b><u>(62,105)</u></b>	<b><u>(75,729)</u></b>
	<b>31/12/2025</b>	<b>31/12/2024</b>
<b>Net deferred tax asset</b>	<b><u>47,927</u></b>	<b><u>23,946</u></b>
<b>(amount presented in the consolidated statement of financial position)</b>		
<b>Deferred tax assets</b>	<b><u>76,274</u></b>	<b><u>56,583</u></b>
<b>Deferred tax liabilities</b>	<b><u>(28,347)</u></b>	<b><u>(32,637)</u></b>

Among deferred tax assets the tax accruals are included the following accruals by entities:

Tax accrual caused by negative taxable income	31/12/2025	31/12/2024	Date until it can be used
Merkantil Rental Ltd.	18	25	31 December 2026
Merkantil Rental Ltd.	78	78	31 December 2027
Merkantil Rental Ltd.	94	94	31 December 2028
OTP Real Estate Leasing Ltd.	-	14	31 December 2025
OTP Real Estate Leasing Ltd.	14	14	31 December 2026
OTP Real Estate Leasing Ltd.	14	15	31 December 2027
OTP Real Estate Leasing Ltd.	15	15	31 December 2028
OTP Real Estate Leasing Ltd.	15	15	31 December 2029
OTP Real Estate Leasing Ltd.	15	15	31 December 2030
OTP Real Estate Leasing Ltd.	15	15	31 December 2031
OTP Real Estate Leasing Ltd.	15	15	31 December 2032
OTP Real Estate Leasing Ltd.	15	-	31 December 2033
Nagisz Ltd.	-	9	31 December 2030
OTP banka d.d. (Slovenia)	<u>28,924</u>	<u>29,865</u>	31 December 2029
	<b><u>29,232</u></b>	<b><u>30,189</u></b>	

**NOTE 35: INCOME TAXES (in HUF mn) [continued]**

Residual tax loss for which the OTP banka d.d. Slovenia has not recorded deferred tax assets amounts to HUF 272,505 million and HUF 334,621 million, so the unrecognized deferred tax assets amount to HUF 59,951 million and HUF 73,617 million as at 31 December 2025 and 2024, respectively. Tax losses could be carried forward indefinitely until 2024 and can be carried forward for five years from 2024 in accordance with the Slovenian Corporate Income Tax Act.

A reconciliation of the income tax income / expense is as follows:

	31/12/2025	31/12/2024
<b>Profit before income tax</b>	<b>1,401,251</b>	<b>1,309,824</b>
<b>Income tax expense at statutory tax rates</b>	<b>233,156</b>	<b>218,249</b>
<b>Income tax adjustments due to permanent differences are as follows:</b>		
Deferred use of tax allowance	226	(26)
Share-based payment and its tax effect of transaction costs recognized directly in shareholders' equity	508	408
Goodwill / negative goodwill correction by local law	-	307
Reversal of statutory general provision	(10)	(7)
Transferred statutory general provision to retained earnings	230	-
Tax effect on discontinued operation	-	1,778
Business tax and innovation contribution	35,603	30,944
Foreign withholding tax	16,672	21,040
Global minimum tax	-	11,076
Utilization of tax loss	(14,040)	(14,357)
Amounts unenforceable by tax law	(1,960)	173
Use of tax allowance in the current year	(40)	(1,276)
Other	<u>(15,419)</u>	<u>(14,869)</u>
<b>Total income tax expense</b>	<b><u>254,926</u></b>	<b><u>253,440</u></b>
<b>Effective tax rate</b>	<b><u>18.19%</u></b>	<b><u>19.35%</u></b>
	<b>31/12/2025</b>	<b>31/12/2024</b>
<b>Net current tax liability</b>	<b><u>(4,345)</u></b>	<b><u>(69,727)</u></b>
<b>(amount presented in the consolidated statement of financial position)</b>		
<b>Current income tax receivables</b>	<b><u>31,296</u></b>	<b><u>7,060</u></b>
<b>Current income tax payable</b>	<b><u>(35,641)</u></b>	<b><u>(76,787)</u></b>

**Global minimum tax**

The Group is in scope of the global minimum tax legislation. The global minimum tax legislation has been enacted in certain jurisdictions OTP Group operates in, mainly in the EU Member States. The legislation has been in effect for the Group's financial year beginning 1 January 2024 and introduced a minimum rate of effective taxation of 15%.

From an accounting perspective, it is unclear if the global minimum tax rules create additional temporary differences, whether to remeasure deferred taxes for the global minimum tax rules and which tax rate to use to measure deferred taxes. In response to this uncertainty, IAS 12 Income taxes standard has been amended to introduce a mandatory temporary exception to the requirements of IAS 12. Under the mandatory temporary exception, a company does not recognize or disclose information about deferred tax assets and liabilities related to the global minimum tax rules. The Group applied the temporary exception for the year ended 31 December 2025.

The global minimum tax legislation had been subject to several significant changes since its first publication and changes are still expected. Based on the most recent information available regarding the financial performance of the group entities and the prevailing interpretation of the global minimum tax legislation, the calculated amount of taxes imposed under the global minimum tax legislation is HUF 10,953 million in 2025 relating to profits earned in Bulgaria. The amount of taxes under the global minimum tax legislation is included in the income tax expense recognized in the Consolidated Statement of Profit or Loss in 2025.

**NOTE 36: LEASES (in HUF mn)****The Group as a lessee:**

Right-of-use assets by class of underlying assets is as follows:

<b>31/12/2025</b>	<b>Property</b>	<b>Office equipment and vehicles</b>	<b>Total</b>
Depreciation expense of right-of-use assets	16,873	1,909	<b>18,782</b>
Additions to right-of-use assets	13,416	434	<b>13,850</b>
Carrying amount of right-of-use assets at the end of the reporting period	78,640	2,947	<b>81,587</b>

<b>31/12/2024</b>	<b>Property</b>	<b>Office equipment and vehicles</b>	<b>Total</b>
Depreciation expense of right-of-use assets	16,432	1,756	<b>18,188</b>
Additions to right-of-use assets	15,992	558	<b>16,550</b>
Carrying amount of right-of-use assets at the end of the reporting period	75,744	4,086	<b>79,830</b>

The total cash outflow for leases was HUF 23,208 million as at 31 December 2025 and HUF 21,512 million as at 31 December 2024.

The Group mainly leases real estates, a significant part of its right-of-use assets are related to branch offices, a smaller part to office buildings and office space.

Leasing liabilities by maturities:

	<b>31/12/2025</b>	<b>31/12/2024</b>
Within one year	14,224	15,171
Over one year	<u>68,177</u>	<u>66,938</u>
<b>Total</b>	<b><u>82,401</u></b>	<b><u>82,109</u></b>

Lease liabilities by payments:

	<b>31/12/2025</b>	<b>31/12/2024</b>
Arising from fixed lease payments	33,707	36,587
Arising from variable lease payments	<u>48,694</u>	<u>45,522</u>
<b>Total</b>	<b><u>82,401</u></b>	<b><u>82,109</u></b>

On 31 December 2025 and 2024 HUF 121 million and HUF 1,025 million is the lease payment respectively to be paid in the future due to leases not yet commenced to which the Group is committed. The future lease payment not taken into account would be HUF 12,910 million as at 31 December 2025 and would have been HUF 4,862 million as at 31 December 2024 arising from extension options if they had been taken into account.

The most typical indexes/rates on which the variable lease payments depend are: Consumer Price Index, Inflation Rate, EURIBOR.

**NOTE 36: LEASES (in HUF mn) [continued]****The Group as a lessee [continued]:**

<b>Amounts recognized in profit and loss</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Interest expense on lease liabilities	4,053	3,557
Expense relating to short-term leases	3,855	3,539
Expense relating to leases of low value assets	1,876	1,949
Expense relating to variable lease payments not included in the measurement of lease liabilities	6	5
Income from subleasing right-of-use assets	-	3
Gains or losses arising from sale and leaseback transactions	-	-

**The Group as a lessor:**

The Group's leasing activities are most significant in Hungary, Bulgaria, Croatia and Slovenia. The main activity of the leasing companies is finance leasing. More than half of the underlying assets are passenger cars, besides this the Group leases mainly agricultural machinery, commercial vehicles, vessels and construction machinery.

The Group manages the risk associated with the rights held in the underlying assets by, inter alia, buy-back agreements, determining the residual values on level lower than future market values and registering pledge on the underlying asset.

**The Group as a lessor, finance lease:**

<b>Amounts receivable under finance leases</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
In less than 1 year	606,827	601,731
Between 1 and 2 years	455,680	435,784
Between 2 and 3 years	343,061	324,401
Between 3 and 4 years	230,779	216,742
Between 4 and 5 years	125,369	122,533
More than 5 years	<u>75,220</u>	<u>75,526</u>
<b>Total receivables from undiscounted lease payments</b>	<b><u>1,836,936</u></b>	<b><u>1,776,717</u></b>
Unguaranteed residual values	=	=
<b>Gross investment in the lease</b>	<b><u>1,836,936</u></b>	<b><u>1,776,717</u></b>
Less: unearned finance income	<u>(223,366)</u>	<u>(225,383)</u>
<b>Present value of minimum lease payments receivable</b>	<b><u>1,613,570</u></b>	<b><u>1,551,334</u></b>
Loss allowance	<u>(25,020)</u>	<u>(39,857)</u>
<b>Net investment in the lease</b>	<b><u>1,588,550</u></b>	<b><u>1,511,477</u></b>

An analysis of the change in the gross values on finance receivables is as follows:

	<b>31/12/2025</b>	<b>31/12/2024</b>
<b>Balance as at 1 January</b>	<b>1,551,334</b>	<b>1,334,732</b>
Additions due to new contracts	830,558	839,584
Additions due to interest income and amortized fees	113,354	110,054
Decrease due to write-off	(533)	(505)
Decrease due to repossession of the asset	(8,464)	(3,040)
Decrease due to sale	(8,490)	(5,455)
Decrease due to early repayment	(108,785)	(94,348)
Decrease due to regular lease payment	(674,360)	(691,799)
Foreign currency translation difference	<u>(81,044)</u>	<u>62,111</u>
<b>Closing balance</b>	<b><u>1,613,570</u></b>	<b><u>1,551,334</u></b>

**NOTE 36: LEASES (in HUF mn) [continued]****The Group as a lessor [continued]:****The Group as a lessor, finance lease [continued]:**

An analysis of the change in the loss allowance on finance receivables is as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>39,857</b>	<b>45,020</b>
Loss allowance for the period	21,126	30,347
Release of loss allowance	(20,997)	(36,865)
Use of loss allowance	(1,476)	(1,279)
Partial write-off	(1,373)	(128)
Decrease due to sale	(8,371)	(5)
Foreign currency translation difference	<u>(3,746)</u>	<u>2,767</u>
<b>Closing balance</b>	<b><u>25,020</u></b>	<b><u>39,857</u></b>

	31/12/2025	31/12/2024
<b>Result from finance leases</b>		
Selling profit or loss	-	-
Finance income on the net investment in the lease	113,822	110,830
Income relating to variable lease payments not included in the measurement of the net investment in the lease	-	-

**The Group as a lessor, operating lease:**

	31/12/2025	31/12/2024
<b>Amounts receivable under operating leases</b>		
In less than 1 year	15,096	16,361
Between 1 and 2 years	10,525	11,607
Between 2 and 3 years	8,609	9,126
Between 3 and 4 years	5,681	6,059
Between 4 and 5 years	3,233	2,732
More than 5 years	<u>2,266</u>	<u>2,428</u>
<b>Total receivables from undiscounted lease payments</b>	<b><u>45,410</u></b>	<b><u>48,313</u></b>

	31/12/2025	31/12/2024
<b>Result from operating leases</b>		
Lease income	18,216	16,086
Therein lease income relating to variable lease payments that do not depend on an index or a rate	-	-

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn)**

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

Financial instruments may result in certain risks to the Group. The most significant risks the Group faces include:

**37.1. Credit risk**

The Group takes on exposure to credit risk which is the risk that a counter-party will be unable to pay amounts in full when due. The Group structures the levels of credit risk it undertakes by placing limits on the amount of risk accepted in relation to one borrower, or banks of borrowers, and to geographical areas and loan types. Such risks are monitored on a periodical basis and are subject to an annual or more frequent review. The exposure to any borrower including banks and brokers is further restricted by sub-limits covering on and off-balance sheet exposures and daily delivery risk limits in relation to trading items such as forward foreign exchange contracts. Actual exposures against limits are monitored daily.

Exposure to credit risk is managed through regular analysis of the ability of borrowers and potential borrowers to meet interest and principal repayment obligations and by changing these lending limits when appropriate. Exposure to credit risk is managed by obtaining collateral, corporate and personal guarantees.

**Defining the expected credit loss on individual and collective basis****On individual basis:**

Individually assessed are the non-retail or non- micro- and small enterprise exposure of significant amount on a stand-alone basis:

- exposure in Stage 3,
- exposure in workout management,
- purchased or originated credit-impaired instruments which are in accordance with the conditions mentioned above.

The calculation of impairment must be prepared and approved by the risk management functional areas. The calculation, all relevant factors (amortized cost, original and current EIR, contracted and expected cash flows (from business and/or collateral) for the individual periods of the entire lifecycle, other essential information enforced during the valuation) and the criteria thereof (including the factors underlying the classification as Stage 3) must be documented individually.

The expected credit loss of the exposure equals the difference of the items' AC (gross book value) on the valuation date and the present value of the receivable's expected cash flows discounted to the valuation date by the exposure's original effective interest rate (EIR) (calculated at the initial recognition, or in the case of variable rate, recalculated due to the last interest rate change). The estimation of the expected future cash flows should be forward looking, it must also contain the effects of the possible change of macroeconomic outlook.

At least two scenarios must be used for the estimation of the expected cash flow. It should be at least one scenario in which the entity anticipates that realized cash flows will be significantly different from the contractual cash flows. Probability weights must be allocated to the individual scenarios. The estimation must reflect the probability of the occurrence and non-occurrence of the credit loss, even if the most probable result is the non-occurrence of the loss.

**On collective basis:**

The following exposures are subject to collective assessment:

- retail exposure irrespective of the amount,
- micro and small enterprise exposures irrespective of the amount,
- all other exposure which are insignificant on a stand-alone basis and not part of the workout management,
- exposure which are not in Stage 3, significant on a stand-alone basis,
- purchased or originated credit-impaired instruments which are in accordance with the conditions mentioned above.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****Defining the expected credit loss on individual and collective basis [continued]****On collective basis [continued]:**

In the collective impairment methodology credit risk and the change of credit risk can be correctly captured by understanding the risk characteristics of the portfolio. In order to achieve this, the main risk drivers shall be identified and used to form homogeneous segments having similar risk characteristics. The segmentation is expected to stay stable from month to month, however a regular (at least yearly) revision of the segmentation process should be set up to capture the change of risk characteristics. The segmentation must be performed separately for each parameter, since in each case different factors may have relevance.

The Bank's Headquarter Group Reserve Committee stipulates the guidelines related to the collective impairment methodology at group level. In addition, it has right of agreement in respect of the risk parameters (PD -probability of default, LGD - loss given default, EAD – exposure at default) and segmentation criteria proposed by the group members.

The review of the parameters must be performed at least annually, and the results should be approved by the Group Reserve Committee. Local Risk Managements are responsible for parameter estimations / updates, macroeconomic scenarios are calculated by OTP Bank Headquarter for each subsidiary and each parameter. Based on the consensus proposal of Local Risk Management and OTP Bank Headquarter, the Group Reserve Committee decides on the modification of parameters (all parameters for impairment calculation).

At least on a yearly basis the impairment parameters should be back tested as well.

The expected loss calculation should be forward looking, including forecasts of future economic conditions. This may be achieved by applying 3-5 different macroeconomic scenarios, which may be integrated in the PD, LGD and EAD parameters.

During 2025 the additional expected loss related to geopolitical risks and ESG risks was separately identified, which is reflected through PD and LGD parameter. Parallely, forward-looking expectations were also reviewed, calculating expected loss in four different (optimistic, baseline, pessimistic, stress) scenarios. Geopolitical risks accounts for HUF 16 billion additional expected loss, while HUF 19 billion expected loss is explained by ESG risks on Group level. In Hungary, multiple cash loan disbursement reason resulted in additional HUF 4 billion expected loss.

The additional impairment recognized due to geopolitical risks covers the increase in credit risk arising from trade policy uncertainties, supply chain vulnerabilities, and potential rises in energy prices. The additional impairment related to ESG risks encompasses both physical and transition risks associated with climate change – including extreme weather events as well as regulatory and market changes – which may directly affect clients' financial position and the value of their assets.

During 2024 in line with the rollout plan DSK Bank and OTP banka Srbija implemented the advanced, lifetime-based methodology for some portfolios to identify the significant increase in credit risk, this methodological change resulted in HUF 3 billion provision creation in the second quarter (DSK Bank) and HUF 1.5 billion in the fourth quarter. DSK Bank identified “novel risks” in the fourth quarter, the provision increase was EUR 10 million. In the fourth quarter of year 2024 a new forward-looking methodology was implemented in Ipoteka Bank regarding the PD parameter estimation in line with the Group IFRS9 methodology. The refinement in the methodology resulted immaterial effect on the total ECL level.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.1. Gross values and loss allowance / provision of financial instruments by stages**

Gross carrying amount and accumulated loss allowance of financial assets at amortized cost and of interest-bearing securities at fair value through other comprehensive income and financial commitments and provision on them by stages as at 31 December 2025:

31/12/2025	Carrying amount / Exposure	Gross carrying amount / Notional value					Accumulated loss allowance / Provision				
		Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total
Placements with other banks	<b>1,991,489</b>	1,990,436	2,465	1,538	-	<b>1,994,439</b>	913	1,049	988	-	<b>2,950</b>
Repo receivables	<b>237,144</b>	236,554	1,539	-	-	<b>238,093</b>	888	61	-	-	<b>949</b>
Mortgage loans	<b>6,570,908</b>	6,200,445	335,456	88,422	46,803	<b>6,671,126</b>	17,451	21,738	46,458	14,571	<b>100,218</b>
Loans to medium and large corporates	<b>8,922,393</b>	7,707,616	1,141,006	304,756	56,426	<b>9,209,804</b>	44,426	84,756	144,338	13,891	<b>287,411</b>
Consumer loans	<b>5,822,770</b>	5,345,368	627,486	352,395	29,390	<b>6,354,639</b>	111,029	131,329	279,721	9,790	<b>531,869</b>
Loans to micro and small enterprises	<b>983,507</b>	<u>793,979</u>	<u>187,709</u>	<u>69,701</u>	<u>7,715</u>	<b>1,059,104</b>	<u>8,009</u>	<u>16,447</u>	<u>47,572</u>	<u>3,569</u>	<b>75,597</b>
<b>Loans at amortized cost</b>	<b><u>22,299,578</u></b>	<b><u>20,047,408</u></b>	<b><u>2,291,657</u></b>	<b><u>815,274</u></b>	<b><u>140,334</u></b>	<b><u>23,294,673</u></b>	<b><u>180,915</u></b>	<b><u>254,270</u></b>	<b><u>518,089</u></b>	<b><u>41,821</u></b>	<b><u>995,095</u></b>
Finance lease receivable	<b>1,588,550</b>	1,391,115	188,342	34,080	33	<b>1,613,570</b>	5,366	6,485	13,141	28	<b>25,020</b>
Interest-bearing securities at fair value through other comprehensive income <sup>1</sup>	<b>1,954,513</b>	1,944,298	1	10,214	-	<b>1,954,513</b>	13,832	-	44,149	-	<b>57,981</b>
Securities at amortized cost	<b>7,925,465</b>	<u>7,917,060</u>	<u>20,254</u>	<u>22,794</u>	-	<b>7,960,108</b>	<u>13,813</u>	<u>1,491</u>	<u>19,339</u>	-	<b>34,643</b>
<b>Financial assets total</b>	<b><u>35,996,739</u></b>	<b><u>33,526,871</u></b>	<b><u>2,504,258</u></b>	<b><u>883,900</u></b>	<b><u>140,367</u></b>	<b><u>37,055,396</u></b>	<b><u>215,727</u></b>	<b><u>263,356</u></b>	<b><u>595,706</u></b>	<b><u>41,849</u></b>	<b><u>1,116,638</u></b>
Loan commitments given	<b>6,862,814</b>	6,567,985	322,569	11,543	515	<b>6,902,612</b>	26,875	10,721	2,150	52	<b>39,798</b>
Financial guarantees given	<b>1,597,023</b>	1,526,769	72,734	8,113	52	<b>1,607,668</b>	6,203	1,806	2,584	52	<b>10,645</b>
Other commitments given	<b>671,363</b>	<u>645,133</u>	<u>28,032</u>	<u>1,233</u>	<u>1,414</u>	<b>675,812</b>	<u>1,628</u>	<u>776</u>	<u>631</u>	<u>1,414</u>	<b>4,449</b>
<b>Financial liabilities total</b>	<b><u>9,131,200</u></b>	<b><u>8,739,887</u></b>	<b><u>423,335</u></b>	<b><u>20,889</u></b>	<b><u>1,981</u></b>	<b><u>9,186,092</u></b>	<b><u>34,706</u></b>	<b><u>13,303</u></b>	<b><u>5,365</u></b>	<b><u>1,518</u></b>	<b><u>54,892</u></b>

<sup>1</sup> Interest bearing securities at fair value through other comprehensive income are recognized in the Consolidated statement of financial position as at fair value (see in Note 9). Loss allowances for securities at fair value through other comprehensive income that are in Stage 1 and / or in Stage 2 is recognized in the Other comprehensive income. It is included in the accumulated loss allowance of this table showed above.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.1. Gross values and loss allowance / provision of financial instruments by stages [continued]**

Gross carrying amount and accumulated loss allowance of financial assets at amortized cost and of interest-bearing securities at fair value through other comprehensive income and financial commitments and provision on them by stages as at 31 December 2024:

31/12/2024	Carrying amount / Exposure	Gross carrying amount / Notional value					Accumulated loss allowance / Provision				
		Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total
Placements with other banks	<b>1,891,901</b>	1,890,786	1,013	1,569	-	<b>1,893,368</b>	505	958	4	-	<b>1,467</b>
Repo receivables	<b>331,837</b>	332,349	-	-	-	<b>332,349</b>	512	-	-	-	<b>512</b>
Mortgage loans	<b>5,947,341</b>	5,431,298	472,986	98,928	62,342	<b>6,065,554</b>	13,685	37,630	44,604	22,294	<b>118,213</b>
Loans to medium and large corporates	<b>8,430,951</b>	7,032,611	1,396,700	268,335	65,329	<b>8,762,975</b>	58,069	113,232	140,769	19,954	<b>332,024</b>
Consumer loans	<b>4,995,814</b>	4,346,073	719,392	281,199	38,405	<b>5,385,069</b>	59,143	118,967	207,025	4,120	<b>389,255</b>
Loans to micro and small enterprises	<b>916,275</b>	655,090	256,690	72,173	10,564	<b>994,517</b>	6,606	19,342	50,005	2,289	<b>78,242</b>
<b>Loans at amortized cost</b>	<b><u>20,290,381</u></b>	<b><u>17,465,072</u></b>	<b><u>2,845,768</u></b>	<b><u>720,635</u></b>	<b><u>176,640</u></b>	<b><u>21,208,115</u></b>	<b><u>137,503</u></b>	<b><u>289,171</u></b>	<b><u>442,403</u></b>	<b><u>48,657</u></b>	<b><u>917,734</u></b>
Finance lease receivable	<b>1,511,477</b>	1,327,216	169,791	54,290	37	<b>1,551,334</b>	6,522	6,168	27,167	-	<b>39,857</b>
Interest-bearing securities at fair value through other comprehensive income <sup>1</sup>	<b>1,622,824</b>	1,593,287	1,739	27,798	-	<b>1,622,824</b>	12,906	87	55,057	-	<b>68,050</b>
Securities at amortized cost	<b>7,447,177</b>	7,441,670	12,521	37,491	-	<b>7,491,682</b>	16,301	855	27,349	-	<b>44,505</b>
<b>Financial assets total</b>	<b><u>33,095,597</u></b>	<b><u>30,050,380</u></b>	<b><u>3,030,832</u></b>	<b><u>841,783</u></b>	<b><u>176,677</u></b>	<b><u>34,099,672</u></b>	<b><u>174,249</u></b>	<b><u>297,239</u></b>	<b><u>551,980</u></b>	<b><u>48,657</u></b>	<b><u>1,072,125</u></b>
Loan commitments given	<b>5,660,885</b>	5,347,629	332,965	12,610	599	<b>5,693,803</b>	19,520	12,046	1,255	97	<b>32,918</b>
Financial guarantees given	<b>1,535,734</b>	1,440,075	95,405	11,832	67	<b>1,547,379</b>	4,450	2,357	4,773	65	<b>11,645</b>
Other commitments given	<b>1,033,567</b>	980,085	51,765	6,015	1,616	<b>1,039,481</b>	2,134	1,785	549	1,446	<b>5,914</b>
<b>Financial liabilities total</b>	<b><u>8,230,186</u></b>	<b><u>7,767,789</u></b>	<b><u>480,135</u></b>	<b><u>30,457</u></b>	<b><u>2,282</u></b>	<b><u>8,280,663</u></b>	<b><u>26,104</u></b>	<b><u>16,188</u></b>	<b><u>6,577</u></b>	<b><u>1,608</u></b>	<b><u>50,477</u></b>

<sup>1</sup> Interest bearing securities at fair value through other comprehensive income are recognized in the Consolidated statement of financial position as at fair value (see in Note 9). Loss allowances for securities at fair value through other comprehensive income that are in Stage 1 and / or in Stage 2 is recognized in the Other comprehensive income. It is included in the accumulated loss allowance of this table showed above.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.2. Financial instruments under simplified approach by day-past-due categories**

31/12/2025	Without delay	< 30 days	31 - 60 days	61 - 90 days	> 91 days	Closing balance
Expected credit loss rate	3.05%	9.33%	3.62%	8.23%	57.64%	
Gross value	124,660	9,404	30,618	2,904	58,466	226,052
Loss allowance	(3,798)	(877)	(1,107)	(239)	(33,697)	(39,718)
Net carrying amount	<u>120,862</u>	<u>8,527</u>	<u>29,511</u>	<u>2,665</u>	<u>24,769</u>	<u>186,334</u>
31/12/2024	Without delay	< 30 days	31 - 60 days	61 - 90 days	> 91 days	Closing balance
Expected credit loss rate	3.67%	6.03%	2.79%	18.66%	65.02%	
Gross value	145,429	34,947	2,544	5,718	53,582	242,220
Loss allowance	(5,333)	(2,108)	(71)	(1,067)	(34,839)	(43,418)
Net carrying amount	<u>140,096</u>	<u>32,839</u>	<u>2,473</u>	<u>4,651</u>	<u>18,743</u>	<u>198,802</u>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.3. Movement table of gross values on financial instruments**

Movement of gross values of financial assets at amortized cost and on interest bearing securities at fair value through other comprehensive income and of financial commitments as at 31 December 2025:

31/12/2025	Opening balance	Increases due to origination and acquisition	Increase on opening balance	Decreases due to payments and derecognition	Transfers between stages (net)	Changes due to modifications without derecognition (net)	Decrease due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>Stage 1</b>	<b>30,050,380</b>	<b>50,067,132</b>	<b>2,361,776</b>	<b>(47,572,851)</b>	<b>(297,120)</b>	<b>(6,182)</b>	<b>(3,864)</b>	<b>(1,072,400)</b>	<b>33,526,871</b>
Placements with other banks	1,890,786	16,496,150	40,127	(16,518,409)	126	-	-	81,656	1,990,436
Repo receivables	332,349	20,475,884	17,726	(20,587,034)	-	-	-	(2,371)	236,554
Loans at amortized cost	17,465,072	9,630,945	1,145,409	(7,225,659)	(237,772)	(6,182)	(3,864)	(720,541)	20,047,408
Finance lease receivables	1,327,216	651,527	44,397	(518,267)	(49,956)	-	-	(63,802)	1,391,115
Interest-bearing securities at fair value through other comprehensive income	1,593,287	1,416,067	131,785	(1,116,171)	-	-	-	(80,670)	1,944,298
Securities at amortized cost	7,441,670	1,396,559	982,332	(1,607,311)	(9,518)	-	-	(286,672)	7,917,060
<b>Stage 2</b>	<b>3,030,832</b>	<b>485,673</b>	<b>142,750</b>	<b>(1,050,096)</b>	<b>10,795</b>	<b>(844)</b>	<b>(628)</b>	<b>(114,224)</b>	<b>2,504,258</b>
Placements with other banks	1,013	1	2,079	(502)	-	-	-	(126)	2,465
Repo receivables	-	1,539	-	-	-	-	-	-	1,539
Loans at amortized cost	2,845,768	414,580	134,027	(958,596)	(38,194)	(844)	(628)	(104,456)	2,291,657
Finance lease receivables	169,791	69,203	6,427	(87,439)	39,471	-	-	(9,111)	188,342
Interest-bearing securities at fair value through other comprehensive income	1,739	-	-	(1,629)	-	-	-	(109)	1
Securities at amortized cost	12,521	350	217	(1,930)	9,518	-	-	(422)	20,254
<b>Stage 3</b>	<b>841,783</b>	<b>69,725</b>	<b>29,085</b>	<b>(234,484)</b>	<b>286,325</b>	<b>(335)</b>	<b>(65,353)</b>	<b>(42,846)</b>	<b>883,900</b>
Placements with other banks	1,569	5,495	618	(5,525)	(126)	-	(1)	(492)	1,538
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	720,635	60,272	27,792	(167,504)	275,965	(335)	(64,817)	(36,734)	815,274
Finance lease receivables	54,290	3,958	675	(29,552)	10,486	-	(535)	(5,242)	34,080
Interest-bearing securities at fair value through other comprehensive income	27,798	-	-	(17,584)	-	-	-	-	10,214
Securities at amortized cost	37,491	-	-	(14,319)	-	-	-	(378)	22,794
<b>Financial assets subtotal</b>	<b>33,922,995</b>	<b>50,622,530</b>	<b>2,533,611</b>	<b>(48,857,431)</b>	<b>=</b>	<b>(7,361)</b>	<b>(69,845)</b>	<b>(1,229,470)</b>	<b>36,915,029</b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.3. Movement table of gross values on financial instruments [continued]**

Movement of gross values of financial assets at amortized cost and on interest-bearing securities at fair value through other comprehensive income and of financial commitments as at 31 December 2025 [continued]:

31/12/2025	Opening balance	Increases due to origination and acquisition	Increase on opening balance	Decreases due to payments and derecognition	Transfers between stages (net)	Changes due to modifications without derecognition (net)	Decrease due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>POCI</b>	<b>176,677</b>	<b>614</b>	<b>2,332</b>	<b>(28,476)</b>	-	-	<b>(3,823)</b>	<b>(6,957)</b>	<b>140,367</b>
Placements with other banks	-	-	-	-	-	-	-	-	-
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	176,640	614	2,332	(28,474)	-	-	(3,823)	(6,955)	140,334
Finance lease receivables	37	-	-	(2)	-	-	-	(2)	33
Interest-bearing securities at fair value through other comprehensive income	-	-	-	-	-	-	-	-	-
Securities at amortized cost	-	-	-	-	-	-	-	-	-
<b>Financial assets total</b>	<b><u>34,099,672</u></b>	<b><u>50,623,144</u></b>	<b><u>2,535,943</u></b>	<b><u>(48,885,907)</u></b>	<b><u>≡</u></b>	<b><u>(7,361)</u></b>	<b><u>(73,668)</u></b>	<b><u>(1,236,427)</u></b>	<b><u>37,055,396</u></b>
Loan commitments and financial guarantees given - Stage 1	7,767,789	3,821,144	668,227	(3,176,272)	(69,598)	-	-	(271,403)	8,739,887
Loan commitments and financial guarantees given - Stage 2	480,135	123,227	31,500	(255,461)	61,387	-	-	(17,453)	423,335
Loan commitments and financial guarantees given - Stage 3	30,457	2,752	1,329	(20,894)	8,211	-	-	(966)	20,889
Loan commitments and financial guarantees given - POCI	2,282	87	123	(373)	-	-	-	(138)	1,981
<b>Financial liabilities total</b>	<b><u>8,280,663</u></b>	<b><u>3,947,210</u></b>	<b><u>701,179</u></b>	<b><u>(3,453,000)</u></b>	<b><u>≡</u></b>	<b><u>≡</u></b>	<b><u>≡</u></b>	<b><u>(289,960)</u></b>	<b><u>9,186,092</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.3. Movement table of gross values on financial instruments [continued]**

Movement of gross values of financial assets at amortized cost and on interest-bearing securities at fair value through other comprehensive income and of financial commitments as at 31 December 2024:

31/12/2024	Opening balance	Increases due to origination and acquisition	Increase on opening balance	Decreases due to payments and derecognition	Transfers between stages (net)	Changes due to modifications without derecognition (net)	Decrease due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>Stage 1</b>	<b>24,804,231</b>	<b>49,571,066</b>	<b>3,265,291</b>	<b>(47,671,939)</b>	<b>(557,933)</b>	<b>(385,833)</b>	<b>(77,702)</b>	<b>1,103,199</b>	<b>30,050,380</b>
Placements with other banks	1,569,167	12,121,835	34,344	(11,915,052)	(2,878)	70,700	-	12,670	1,890,786
Repo receivables	224,477	25,909,255	829,891	(26,642,511)	-	-	-	11,237	332,349
Loans at amortized cost	15,263,928	8,021,531	1,277,288	(6,771,271)	(610,914)	(455,022)	(77,702)	817,234	17,465,072
Finance lease receivables	1,095,039	653,498	41,095	(484,115)	(25,069)	(1,690)	-	48,458	1,327,216
Interest-bearing securities at fair value through other comprehensive income	1,423,021	936,826	48,326	(965,565)	85,223	-	-	65,456	1,593,287
Securities at amortized cost	5,228,599	1,928,121	1,034,347	(893,425)	(4,295)	179	-	148,144	7,441,670
<b>Stage 2</b>	<b>2,731,872</b>	<b>557,587</b>	<b>221,602</b>	<b>(1,005,159)</b>	<b>368,756</b>	<b>51,024</b>	<b>(4,568)</b>	<b>109,718</b>	<b>3,030,832</b>
Placements with other banks	63	-	2,006	(1,994)	887	-	-	51	1,013
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	2,455,644	495,632	213,584	(898,194)	434,478	51,024	(4,568)	98,168	2,845,768
Finance lease receivables	176,856	61,955	5,711	(97,828)	14,319	-	-	8,778	169,791
Interest-bearing securities at fair value through other comprehensive income	87,085	-	-	(2,397)	(85,223)	-	-	2,274	1,739
Securities at amortized cost	12,224	-	301	(4,746)	4,295	-	-	447	12,521
<b>Stage 3</b>	<b>842,706</b>	<b>127,120</b>	<b>38,712</b>	<b>(316,752)</b>	<b>189,177</b>	<b>60,452</b>	<b>(123,558)</b>	<b>23,926</b>	<b>841,783</b>
Placements with other banks	15	8,575	5	(9,087)	1,991	-	(7)	77	1,569
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	707,921	112,880	34,359	(268,866)	176,437	60,454	(123,037)	20,487	720,635
Finance lease receivables	62,799	4,616	1,561	(27,832)	10,749	(2)	(514)	2,913	54,290
Interest-bearing securities at fair value through other comprehensive income	30,874	-	27	(3,103)	-	-	-	-	27,798
Securities at amortized cost	41,097	1,049	2,760	(7,864)	-	-	-	449	37,491
<b>Financial assets subtotal</b>	<b><u>28,378,809</u></b>	<b><u>50,255,773</u></b>	<b><u>3,525,605</u></b>	<b><u>(48,993,850)</u></b>	<b><u>=</u></b>	<b><u>(274,357)</u></b>	<b><u>(205,828)</u></b>	<b><u>1,236,843</u></b>	<b><u>33,922,995</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.3. Movement table of gross values on financial instruments [continued]**

Movement of gross values of financial assets at amortized cost and on interest-bearing securities at fair value through other comprehensive income and of financial commitments as at 31 December 2024 [continued]:

31/12/2024	Opening balance	Increases due to origination and acquisition	Increase on opening balance	Decreases due to payments and derecognition	Transfers between stages (net)	Changes due to modifications without derecognition (net)	Decrease due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>POCI</b>	<b>143,109</b>	<b>57,247</b>	<b>9,563</b>	<b>(33,303)</b>	-	<b>(4,826)</b>	<b>(4,076)</b>	<b>8,963</b>	<b>176,677</b>
Placements with other banks	-	-	-	-	-	-	-	-	-
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	143,071	57,247	9,563	(33,300)	-	(4,826)	(4,076)	8,961	176,640
Finance lease receivables	38	-	-	(3)	-	-	-	2	37
Interest-bearing securities at fair value through other comprehensive income	-	-	-	-	-	-	-	-	-
Securities at amortized cost	-	-	-	-	-	-	-	-	-
<b>Financial assets total</b>	<b><u>28,521,918</u></b>	<b><u>50,313,020</u></b>	<b><u>3,535,168</u></b>	<b><u>(49,027,153)</u></b>	<b><u>≡</u></b>	<b><u>(279,183)</u></b>	<b><u>(209,904)</u></b>	<b><u>1,245,806</u></b>	<b><u>34,099,672</u></b>
Loan commitments and financial guarantees given - Stage 1	6,706,369	4,352,876	1,242,666	(4,682,200)	(71,095)	(23,984)	-	243,157	7,767,789
Loan commitments and financial guarantees given - Stage 2	403,470	220,286	66,676	(277,203)	58,042	(3,896)	-	12,760	480,135
Loan commitments and financial guarantees given - Stage 3	27,804	7,868	888	(19,335)	13,053	(326)	-	505	30,457
Loan commitments and financial guarantees given - POCI	2,506	2,190	528	(3,118)	-	(3)	-	179	2,282
<b>Financial liabilities total</b>	<b><u>7,140,149</u></b>	<b><u>4,583,220</u></b>	<b><u>1,310,758</u></b>	<b><u>(4,981,856)</u></b>	<b><u>≡</u></b>	<b><u>(28,209)</u></b>	<b><u>≡</u></b>	<b><u>256,601</u></b>	<b><u>8,280,663</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.4. Movement table of loss allowance / provision on financial instruments**

Movement of loss allowance on financial assets at amortized cost and on interest-bearing securities at fair value through other comprehensive income and of provision of financial commitments as at 31 December 2025:

31/12/2025	Opening balance	Increases due to origination and acquisition	Decreases due to derecognition or to other reasons not related to change in credit risk	Transfers between stages (net)	Changes due to change in credit risk (net)	Decrease in loss allowance account due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>Stage 1</b>	<b>174,249</b>	<b>118,463</b>	<b>(56,992)</b>	<b>7,185</b>	<b>(20,103)</b>	<b>(103)</b>	<b>(6,972)</b>	<b>215,727</b>
Placements with other banks	505	1,579	(2,171)	-	1,072	-	(72)	913
Repo receivables	512	7,255	(7,147)	-	305	-	(37)	888
Loans at amortized cost	137,503	98,492	(38,201)	7,355	(19,306)	(103)	(4,825)	180,915
Finance lease receivables	6,522	2,981	(1,520)	(396)	(1,532)	-	(689)	5,366
Interest-bearing securities at fair value through other comprehensive income	12,906	5,893	(4,155)	-	262	-	(1,074)	13,832
Securities at amortized cost	16,301	2,263	(3,798)	226	(904)	-	(275)	13,813
<b>Stage 2</b>	<b>297,239</b>	<b>42,471</b>	<b>(58,855)</b>	<b>(67,540)</b>	<b>61,540</b>	<b>(561)</b>	<b>(10,938)</b>	<b>263,356</b>
Placements with other banks	958	-	-	-	92	-	(1)	1,049
Repo receivables	-	61	-	-	-	-	-	61
Loans at amortized cost	289,171	40,242	(57,592)	(67,612)	61,097	(561)	(10,475)	254,270
Finance lease receivables	6,168	2,168	(1,182)	298	(532)	-	(435)	6,485
Interest-bearing securities at fair value through other comprehensive income	87	-	(81)	-	-	-	(6)	-
Securities at amortized cost	855	-	-	(226)	883	-	(21)	1,491
<b>Stage 3</b>	<b>551,980</b>	<b>27,897</b>	<b>(73,077)</b>	<b>60,355</b>	<b>99,503</b>	<b>(52,377)</b>	<b>(18,575)</b>	<b>595,706</b>
Placements with other banks	4	-	-	-	1,477	(1)	(492)	988
Repo receivables	-	-	-	-	-	-	-	-
Loans at amortized cost	442,403	26,329	(50,069)	60,257	105,803	(51,859)	(14,775)	518,089
Finance lease receivables	27,167	1,568	(13,058)	98	964	(517)	(3,081)	13,141
Interest-bearing securities at fair value through other comprehensive income	55,057	-	(4,093)	-	(6,815)	-	-	44,149
Securities at amortized cost	27,349	-	(5,857)	-	(1,926)	-	(227)	19,339
<b>Loss allowance on financial assets</b>	<b>1,023,468</b>	<b>188,831</b>	<b>(188,924)</b>	<b>=</b>	<b>140,940</b>	<b>(53,041)</b>	<b>(36,485)</b>	<b>1,074,789</b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.4. Movement table of loss allowance / provision on financial instruments [continued]**

Movement of loss allowance on financial assets at amortized cost and on interest-bearing securities at fair value through other comprehensive income and of provision of financial commitments as at 31 December 2025 [continued]:

31/12/2025	Opening balance	Increases due to origination and acquisition	Decreases due to derecognition or to other reasons not related to change in credit risk	Transfers between stages (net)	Changes due to change in credit risk (net)	Decrease in loss allowance account due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>POCI</b>	<b>48,657</b>	<b>119</b>	<b>(4,875)</b>	-	<b>3,734</b>	<b>(3,293)</b>	<b>(2,493)</b>	<b>41,849</b>
Placements with other banks	-	-	-	-	-	-	-	-
Repo receivables	-	-	-	-	-	-	-	-
Loans at amortized cost	48,657	119	(4,875)	-	3,706	(3,293)	(2,493)	41,821
Finance lease receivables	-	-	-	-	28	-	-	28
Interest-bearing securities at fair value through other comprehensive income	-	-	-	-	-	-	-	-
Securities at amortized cost	-	-	-	-	-	-	-	-
<b>Loss allowance on financial assets total</b>	<b><u>1,072,125</u></b>	<b><u>188,950</u></b>	<b><u>(193,799)</u></b>	=	<b><u>144,674</u></b>	<b><u>(56,334)</u></b>	<b><u>(38,978)</u></b>	<b><u>1,116,638</u></b>
Loan commitments and financial guarantees given - Stage 1	26,104	16,068	(7,496)	2,569	(1,556)	-	(983)	34,706
Loan commitments and financial guarantees given - Stage 2	16,188	3,494	(4,755)	(3,299)	2,196	-	(521)	13,303
Loan commitments and financial guarantees given - Stage 3	6,577	338	(3,145)	730	991	-	(126)	5,365
Loan commitments and financial guarantees given - POCI	1,608	-	(4)	-	13	-	(99)	1,518
<b>Provision on financial liabilities total</b>	<b><u>50,477</u></b>	<b><u>19,900</u></b>	<b><u>(15,400)</u></b>	=	<b><u>1,644</u></b>	=	<b><u>(1,729)</u></b>	<b><u>54,892</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.4. Movement table of loss allowance / provision on financial instruments [continued]**

Movement of loss allowance on financial assets at amortized cost and on interest-bearing securities at fair value through other comprehensive income and of provision of financial commitments as at 31 December 2024:

31/12/2024	Opening balance	Increases due to origination and acquisition	Decreases due to derecognition or to other reasons not related to change in credit risk	Transfers between stages (net)	Changes due to change in credit risk (net)	Changes due to modifications without derecognition (net)	Decrease in loss allowance account due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>Stage 1</b>	<b>174,434</b>	<b>97,184</b>	<b>(92,071)</b>	<b>(21,893)</b>	<b>14,001</b>	<b>(3,066)</b>	<b>(1,030)</b>	<b>6,690</b>	<b>174,249</b>
Placements with other banks	2,182	2,077	(3,709)	-	(209)	-	-	164	505
Repo receivables	593	7,730	(8,052)	-	249	-	-	(8)	512
Loans at amortized cost	137,792	77,157	(68,211)	(25,665)	14,422	(2,853)	(1,030)	5,891	137,503
Finance lease receivables	5,331	2,591	(5,159)	3,821	(318)	(73)	-	329	6,522
Interest-bearing securities at fair value through other comprehensive income	11,395	4,150	(2,964)	(2,150)	2,354	46	-	75	12,906
Securities at amortized cost	17,141	3,479	(3,976)	2,101	(2,497)	(186)	-	239	16,301
<b>Stage 2</b>	<b>247,554</b>	<b>30,326</b>	<b>(64,795)</b>	<b>(11,643)</b>	<b>54,067</b>	<b>33,705</b>	<b>(1,311)</b>	<b>9,336</b>	<b>297,239</b>
Placements with other banks	55	-	(41)	-	938	-	-	6	958
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	238,144	28,554	(60,447)	(10,722)	52,253	33,705	(1,311)	8,995	289,171
Finance lease receivables	8,342	1,772	(3,761)	(970)	498	-	-	287	6,168
Interest-bearing securities at fair value through other comprehensive income	258	-	(125)	-	(59)	-	-	13	87
Securities at amortized cost	755	-	(421)	49	437	-	-	35	855
<b>Stage 3</b>	<b>535,059</b>	<b>29,447</b>	<b>(85,603)</b>	<b>33,536</b>	<b>102,133</b>	<b>19,342</b>	<b>(96,122)</b>	<b>14,188</b>	<b>551,980</b>
Placements with other banks	10	-	(224)	-	148	-	(7)	77	4
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	466,068	26,150	(75,990)	36,389	53,089	19,342	(95,603)	12,958	442,403
Finance lease receivables	31,309	2,247	(8,082)	(2,853)	4,058	-	(512)	1,000	27,167
Interest-bearing securities at fair value through other comprehensive income	22,920	-	-	2,150	29,987	-	-	-	55,057
Securities at amortized cost	14,752	1,050	(1,307)	(2,150)	14,851	-	-	153	27,349
<b>Loss allowance on financial assets</b>	<b>957,047</b>	<b>156,957</b>	<b>(242,469)</b>	<b>=</b>	<b>170,201</b>	<b>49,981</b>	<b>(98,463)</b>	<b>30,214</b>	<b>1,023,468</b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.4. Movement table of loss allowance / provision on financial instruments [continued]**

Movement of loss allowance on financial assets at amortized cost and on interest-bearing securities at fair value through other comprehensive income and of provision of financial commitments as at 31 December 2024 [continued]:

31/12/2024	Opening balance	Increases due to origination and acquisition	Decreases due to derecognition or to other reasons not related to change in credit risk	Transfers between stages (net)	Changes due to change in credit risk (net)	Changes due to modifications without derecognition (net)	Decrease in loss allowance account due to write-offs	Foreign exchange and other adjustment	Closing balance
<b>POCI</b>	<b>52,065</b>	<b>137</b>	<b>(11,443)</b>	-	<b>8,484</b>	<b>1,005</b>	<b>(3,859)</b>	<b>2,268</b>	<b>48,657</b>
Placements with other banks	-	-	-	-	-	-	-	-	-
Repo receivables	-	-	-	-	-	-	-	-	-
Loans at amortized cost	52,027	137	(11,440)	-	8,484	1,005	(3,859)	2,303	48,657
Finance lease receivables	38	-	(3)	-	-	-	-	(35)	-
Interest-bearing securities at fair value through other comprehensive income	-	-	-	-	-	-	-	-	-
Securities at amortized cost	-	-	-	-	-	-	-	-	-
<b>Loss allowance on financial assets total</b>	<b><u>1,009,112</u></b>	<b><u>157,094</u></b>	<b><u>(253,912)</u></b>	<b>≡</b>	<b><u>178,685</u></b>	<b><u>50,986</u></b>	<b><u>(102,322)</u></b>	<b><u>32,482</u></b>	<b><u>1,072,125</u></b>
Loan commitments and financial guarantees given - Stage 1	28,142	14,476	(10,645)	(4,365)	(3,420)	850	-	1,066	26,104
Loan commitments and financial guarantees given - Stage 2	11,172	3,746	(5,965)	2,752	4,098	52	-	333	16,188
Loan commitments and financial guarantees given - Stage 3	5,567	1,505	(3,187)	1,613	1,149	(169)	-	99	6,577
Loan commitments and financial guarantees given - POCI	1,256	-	(562)	-	824	-	-	90	1,608
<b>Provision on financial liabilities total</b>	<b><u>46,137</u></b>	<b><u>19,727</u></b>	<b><u>(20,359)</u></b>	<b>≡</b>	<b><u>2,651</u></b>	<b><u>733</u></b>	<b>≡</b>	<b><u>1,588</u></b>	<b><u>50,477</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.5. Loan portfolio by internal ratings**

31/12/2025 Internal rating grade	Gross carrying amount				Total
	Stage 1	Stage 2	Stage 3	POCI	
Low risk grade (1-4)	14,167,217	947,366	-	22,662	<b>15,137,245</b>
Medium risk grade (5-7)	7,079,274	1,194,898	-	34,886	<b>8,309,058</b>
High risk grade (8-9)	192,032	337,735	-	22,094	<b>551,861</b>
Non-performing	=	=	<u>849,354</u>	<u>60,725</u>	<b><u>910,079</u></b>
<b>Total loans at amortized cost and finance lease receivable</b>	<b><u>21,438,523</u></b>	<b><u>2,479,999</u></b>	<b><u>849,354</u></b>	<b><u>140,367</u></b>	<b><u>24,908,243</u></b>

31/12/2025 Internal rating grade	Accumulated loss allowance				Total
	Stage 1	Stage 2	Stage 3	POCI	
Low risk grade (1-4)	83,817	91,440	-	325	<b>175,582</b>
Medium risk grade (5-7)	95,323	127,982	-	2,675	<b>225,980</b>
High risk grade (8-9)	7,141	41,333	-	185	<b>48,659</b>
Non-performing	=	=	<u>531,230</u>	<u>38,664</u>	<b><u>569,894</u></b>
<b>Total loans at amortized cost and finance lease receivable</b>	<b><u>186,281</u></b>	<b><u>260,755</u></b>	<b><u>531,230</u></b>	<b><u>41,849</u></b>	<b><u>1,020,115</u></b>

31/12/2024 Internal rating grade	Gross carrying amount				Total
	Stage 1	Stage 2	Stage 3	POCI	
Low risk grade (1-4)	12,329,875	987,132	-	6,655	<b>13,323,662</b>
Medium risk grade (5-7)	6,170,989	1,499,654	-	78,012	<b>7,748,655</b>
High risk grade (8-9)	291,424	528,773	-	8,907	<b>829,104</b>
Non-performing	=	=	<u>774,925</u>	<u>83,103</u>	<b><u>858,028</u></b>
<b>Total loans at amortized cost and finance lease receivable</b>	<b><u>18,792,288</u></b>	<b><u>3,015,559</u></b>	<b><u>774,925</u></b>	<b><u>176,677</u></b>	<b><u>22,759,449</u></b>

31/12/2024 Internal rating grade	Accumulated loss allowance				Total
	Stage 1	Stage 2	Stage 3	POCI	
Low risk grade (1-4)	69,858	86,080	-	185	<b>156,123</b>
Medium risk grade (5-7)	67,302	152,411	-	12,292	<b>232,005</b>
High risk grade (8-9)	6,865	56,848	-	231	<b>63,944</b>
Non-performing	=	=	<u>469,570</u>	<u>35,949</u>	<b><u>505,519</u></b>
<b>Total loans at amortized cost and finance lease receivable</b>	<b><u>144,025</u></b>	<b><u>295,339</u></b>	<b><u>469,570</u></b>	<b><u>48,657</u></b>	<b><u>957,591</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.6. Geographical analysis of the loan portfolio**

The geographical analysis of the non-qualified and qualified gross loan portfolio at amortized cost, finance lease receivables, placements with other banks and repo receivables and their loss allowances is as follows:

Country	31/12/2025		31/12/2024	
	Gross amount of exposure	Loss allowance	Gross amount of exposure	Loss allowance
Hungary	6,615,072	245,157	6,031,853	247,357
Bulgaria	5,320,708	132,430	4,751,756	142,822
Croatia	2,843,747	80,496	2,802,968	88,648
Serbia	2,642,196	78,301	2,656,365	84,911
Slovenia	2,609,230	46,410	2,657,708	45,290
Russia	2,987,879	238,594	2,209,676	121,391
Ukraine	461,936	36,355	450,007	52,645
Montenegro	624,663	14,395	547,509	14,351
Uzbekistan	1,158,175	113,275	1,300,549	121,084
Albania	533,796	19,978	506,958	20,809
Moldova	208,151	6,428	185,111	7,266
Romania	103,204	1,759	92,050	177
France	181,413	240	98,937	326
Germany	197,433	2,608	127,030	4,250
Belgium	55,036	177	52,880	130
Austria	54,856	150	40,781	220
Slovakia	44,166	682	69,786	409
The Netherlands	124,825	1,994	120,264	2,211
Switzerland	17,713	273	11,705	183
United Kingdom	39,312	1,217	28,745	265
United States of America	124,381	384	117,556	382
Luxembourg	38,137	228	28,654	266
Poland	20,216	325	24,322	513
Italy	19,179	295	18,116	670
Ireland	34,526	321	12,129	56
Cyprus	3,154	134	142	13
Denmark	418	5	128	2
<b>Subtotal</b>	<b><u>27,063,522</u></b>	<b><u>1,022,611</u></b>	<b><u>24,943,685</u></b>	<b><u>956,647</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.6. Geographical analysis of the loan portfolio [continued]**

Country	31/12/2025		31/12/2024	
	Gross amount of exposure	Loss allowance	Gross amount of exposure	Loss allowance
Czech Republic	2,663	15	3,002	7
Portugalia	810	10	3,086	182
Canada	90	2	86	2
Australia	109	-	96	-
Greece	3,908	126	1,961	192
Turkey	2,062	49	340	7
Spain	27,094	183	15,312	517
Israel	1,097	7	1,389	10
Bosnia and Herzegovina	2,361	358	1,915	318
Sweden	3,292	50	784	13
Norway	158	14	111	1
United Arab Emirates	183	1	3,049	1,051
Egypt	103	6	100	4
Kazakhstan	7,515	45	345	7
Latvia	896	9	132	4
Other <sup>1</sup>	<u>24,912</u>	<u>528</u>	<u>9,773</u>	<u>608</u>
<b>Subtotal</b>	<b><u>77,253</u></b>	<b><u>1,403</u></b>	<b><u>41,481</u></b>	<b><u>2,923</u></b>
<b>Total</b>	<b><u>27,140,775</u></b>	<b><u>1,024,014</u></b>	<b><u>24,985,166</u></b>	<b><u>959,570</u></b>

<sup>1</sup>Other category as at 31 December 2025 mainly includes e.g.: Marshall-Islands, Liberia, North-Macedonia, Finland, Brazil, Kosovo, India, Japan, Armenia other countries.

The geographical analysis of the non-qualified and qualified loan portfolio mandatorily at fair value through profit or loss is as follows:

Country	31/12/2025	31/12/2024
Hungary	1,941,203	1,559,631
Switzerland	-	127
Germany	9	10
Slovakia	1	1
Romania	1	2
Others	<u>8</u>	<u>10</u>
<b>Total loans at fair value</b>	<b><u>1,941,222</u></b>	<b><u>1,559,781</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.7. Loan portfolio classification by economic activities**

	<b>31/12/2025</b>	<b>31/12/2024</b>
<b>Gross loan at amortized cost and finance lease receivable portfolio by economic activities</b>		
Retail	13,215,001	10,717,244
Agriculture, forestry and fishing	662,220	766,924
Manufacturing, mining and quarrying and other industry	3,083,992	3,330,225
Construction	784,588	923,426
Wholesale and retail trade, transportation, storage and hospitality	3,518,956	3,617,724
Information and communication	78,780	279,907
Financial and insurance activities	231,515	432,383
Real estate activities	546,311	999,529
Professional, scientific, technical, administration and support service activities	1,840,160	877,282
Public administration, defence, education, human health and social work activities	764,341	578,553
Other services	<u>182,379</u>	<u>236,252</u>
<b>Total gross loans and finance lease receivable</b>	<b><u>24,908,243</u></b>	<b><u>22,759,449</u></b>
<b>Loss allowance on loans at amortized cost and finance lease receivable by economic activities</b>		
Retail	625,361	415,191
Agriculture, forestry and fishing	31,628	42,137
Manufacturing, mining and quarrying and other industry	145,585	183,900
Construction	24,961	47,242
Wholesale and retail trade, transportation, storage and hospitality	117,138	170,773
Information and communication	2,656	12,998
Financial and insurance activities	4,303	7,429
Real estate activities	7,236	35,331
Professional, scientific, technical, administration and support service activities	44,517	27,885
Public administration, defence, education, human health and social work activities	14,155	10,803
Other services	<u>2,575</u>	<u>3,902</u>
<b>Total loss allowance on loans and finance lease receivable</b>	<b><u>1,020,115</u></b>	<b><u>957,591</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.8. Collateral**

The values of collateral received and held by the Group by types are as follows (**total value of the collaterals**).  
The collateral covers loans as well as off-balance sheet exposures.

**Held collaterals at book value by type of collateral**

	<b>31/12/2025</b>	<b>31/12/2024</b>
Mortgages	29,412,557	23,642,106
Guarantees and warranties	1,770,941	1,745,316
Guarantees of state or state-owned organizations	1,923,045	1,934,251
Assignments (revenue or other receivables)	261,065	222,085
Securities	296,375	270,824
Cash deposits	229,690	299,769
Other	<u>3,345,748</u>	<u>3,077,755</u>
<b>Total</b>	<b><u>37,239,421</u></b>	<b><u>31,192,106</u></b>

**Held collaterals at fair value by type of collateral**

	<b>31/12/2025</b>	<b>31/12/2024</b>
Mortgages	37,064,134	28,502,087
Guarantees and warranties	1,699,610	1,754,520
Guarantees of state or state-owned organizations	1,869,607	1,945,681
Assignments (revenue or other receivables)	393,266	374,866
Securities	717,874	308,090
Cash deposits	312,801	284,637
Other	<u>4,396,475</u>	<u>3,703,979</u>
<b>Total</b>	<b><u>46,453,767</u></b>	<b><u>36,873,860</u></b>

The values of collateral received and held by the Group by types are as follows (**to the extent of the exposures**).  
The collaterals cover loans as well as off-balance sheet exposures.

**Held collaterals at book value by type of collateral**

	<b>31/12/2025</b>	<b>31/12/2024</b>
Mortgages	13,921,699	10,372,684
Guarantees and warranties	1,410,500	1,360,597
Guarantees of state or state-owned organizations	1,448,709	1,614,324
Assignments (revenue or other receivables)	98,845	97,793
Securities	164,606	94,680
Cash deposits	158,733	162,142
Other	<u>1,467,874</u>	<u>1,014,932</u>
<b>Total</b>	<b><u>18,670,966</u></b>	<b><u>14,717,152</u></b>

The coverage level of the loan portfolio to the total collateral at book value increased from 109.64% to 118.75% and the coverage level to the extent of the exposures at book value increased from 51.73% to 59.54% as at 31 December 2025 comparing with the previous period.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.8. Collateral [continued]**

The values of collateral received and held by the Group by the positions of the related exposures are as follows:

31/12/2025	Maximum exposure to credit risk, book value	Fair value of collaterals	Surplus collateral	Net exposure	Associated expected credit loss
<b>On balance items</b>					
Cash, due from banks and balances with the National Banks	4,965,635	-	-	4,965,635	(1,829)
Placements with other banks	1,991,489	117,063	(1,947)	1,876,373	(2,950)
Repo receivables	237,144	326,441	(3,711)	(85,586)	(949)
Securities at amortized cost	7,925,465	7,405	(129)	7,918,189	(34,643)
Loans and undrawn line of credit	30,750,942	40,656,010	(19,044,917)	9,139,849	(1,059,913)
<b>Total financial assets at amortized cost</b>	<b>45,870,675</b>	<b>41,106,919</b>	<b>(19,050,704)</b>	<b>23,814,460</b>	<b>(1,100,284)</b>
Financial assets at fair value through profit or loss	223,995	2,600,000	-	(2,376,005)	-
Financial assets at fair value through other comprehensive income	1,954,513	5,789	(97)	1,948,821	(57,981)
Loans mandatorily at fair value through profit or loss	1,941,222	1,300,691	(2,052,476)	2,693,007	-
Derivative financial instruments	150,216	75,914	=	74,302	=
<b>Total financial assets at fair value</b>	<b>4,269,946</b>	<b>3,982,394</b>	<b>(2,052,573)</b>	<b>2,340,125</b>	<b>(57,981)</b>
<b>Total on balance sheet items</b>	<b>50,140,621</b>	<b>45,089,313</b>	<b>(21,103,277)</b>	<b>26,154,585</b>	<b>(1,158,265)</b>
<b>Off-balance items</b>					
Financial guarantees	1,597,023	1,042,179	(404,954)	959,798	(10,645)
Other off-balance sheet commitments	671,363	322,275	(130,889)	479,977	(4,449)
<b>Total off-balance sheet items</b>	<b>2,268,386</b>	<b>1,364,454</b>	<b>(535,843)</b>	<b>1,439,775</b>	<b>(15,094)</b>
<b>31/12/2024</b>					
	<b>Maximum exposure to credit risk, book value</b>	<b>Fair value of collaterals</b>	<b>Surplus collateral</b>	<b>Net exposure</b>	<b>Associated expected credit loss</b>
<b>On balance items</b>					
Cash, due from banks and balances with the National Banks	6,079,012	-	-	6,079,012	(1,273)
Placements with other banks	1,891,901	136,366	(369)	1,755,904	(1,467)
Repo receivables	331,837	35,435	14,058	282,344	(512)
Securities at amortized cost	7,447,177	20,944	(449)	7,426,682	(44,505)
Loans and undrawn line of credit	27,930,682	31,644,423	(10,653,035)	6,939,294	(990,509)
<b>Total financial assets at amortized cost</b>	<b>43,680,609</b>	<b>31,837,168</b>	<b>(10,639,795)</b>	<b>22,483,236</b>	<b>(1,038,266)</b>
Financial assets at fair value through profit or loss	512,178	-	77,958	434,220	-
Financial assets at fair value through other comprehensive income	1,622,824	7,405	(315)	1,615,734	(60,890)
Loans mandatorily at fair value through profit or loss <sup>1</sup>	1,559,781	3,331,055	(1,908,009)	136,735	-
Derivative financial instruments	202,894	129,509	=	73,385	=
<b>Total financial assets at fair value</b>	<b>3,897,677</b>	<b>3,467,969</b>	<b>(1,830,366)</b>	<b>2,260,074</b>	<b>(60,890)</b>
<b>Total on balance sheet items</b>	<b>47,578,286</b>	<b>35,305,137</b>	<b>(12,470,161)</b>	<b>24,743,310</b>	<b>(1,099,156)</b>
<b>Off-balance items</b>					
Financial guarantees	1,535,734	1,295,042	(253,697)	494,389	(11,645)
Other off-balance sheet commitments	565,628	273,681	(80,899)	372,846	(5,914)
<b>Total off-balance sheet items</b>	<b>2,101,362</b>	<b>1,568,723</b>	<b>(334,596)</b>	<b>867,235</b>	<b>(17,559)</b>

<sup>1</sup>: Comparing with the previous year's disclosure, in 2024 Loans mandatorily at fair value through profit or loss was included into Financial assets at fair value through profit or loss line.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.8. Collateral [continued]**

Returns from realization of collaterals taken into possession by types of collateral

<b>Types of collateral</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Real estate	11,623	15,796
from this: real estate taken into possession by OTP group member	3,095	5,470
Guarantee	33,377	47,292
Bail	99	31
Movable property	6,004	5,807
Other	<u>2,708</u>	<u>3,399</u>
<b>Proceeds from enforcement of collaterals</b>	<b><u>53,811</u></b>	<b><u>72,325</u></b>

**37.1.9. Restructured loans**

	<b>31/12/2025</b>		<b>31/12/2024</b>	
	<b>Gross portfolio</b>	<b>Loss allowance</b>	<b>Gross portfolio</b>	<b>Loss allowance</b>
Retail mortgage loans	10,998	(739)	16,542	(1,102)
Loans to medium and large corporations	86,028	(10,566)	209,001	(28,987)
Retail consumer loans	63,356	(23,320)	54,239	(18,861)
Loans to micro and small enterprises	9,444	(989)	23,580	(2,247)
Municipal	1,178	(48)	1,433	(48)
Other loans	<u>12,193</u>	<u>(4,529)</u>	<u>4,345</u>	<u>(1,130)</u>
<b>Total</b>	<b><u>183,197</u></b>	<b><u>(40,191)</u></b>	<b><u>309,140</u></b>	<b><u>(52,375)</u></b>

The forbore definition used by the Group is based on EU 2015/227 regulation.

Restructuring (forbearance) is a modification of the contract – initiated by either the client or the bank – that provides a concession or allowance towards the client in respect to the client's current or future financial difficulties. The table of restructured loans contains exposures classified as performing forbore. An exposure is considered performing forbore if the conditions of the non-performing status are not met at the time of the restructuring, or the exposure fulfilled the requirements of the minimum one-year cure period as non-performing forbore.

Compared to end of 2024 the volume of performing forbore exposures to corporates has decreased significantly due to healing from performing forbore status. Most of the healing is related to Hungary, Croatia, Bulgaria and Uzbekistan.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.10. Financial instruments by Moody's rating categories****Trading securities as at fair value through profit or loss**

31/12/2025	Aaa	Aa1	Aa2	Aa3	A1	A2	A3	Baa1	Baa2	Baa3	Ba1	Ba2	Ba3	B2	Not rated	Total
Government bonds	1,998	61	-	14,179	39	1,647	2,707	11,265	107,785	8,346	-	731	4,522	219	-	153,499
Equity instruments and fund units	-	-	20	15	18	21	26	81	16	8	-	193	11	-	1,578	1,987
Corporate bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,122	1,122
Discounted Treasury bills	-	-	-	-	-	-	4	-	17,389	-	-	-	-	-	39	17,432
Mortgage bonds National Bank of Hungary bonds	-	-	-	-	98	-	-	-	-	-	-	-	-	-	9	107
Other interest bearing securities	-	-	-	-	-	-	-	433	6,001	872	249	-	-	-	6,845	14,400
Other non-interest bearing securities	=	=	=	=	=	=	=	=	=	=	=	=	=	=	778	778
<b>Total</b>	<b>1,998</b>	<b>61</b>	<b>20</b>	<b>14,194</b>	<b>155</b>	<b>1,668</b>	<b>2,737</b>	<b>11,779</b>	<b>149,001</b>	<b>9,226</b>	<b>249</b>	<b>924</b>	<b>4,533</b>	<b>219</b>	<b>29,996</b>	<b>226,760</b>

31/12/2024	Aaa	Aa2	Aa3	A1	A2	A3	Baa1	Baa2	Baa3	Ba1	Ba2	Ba3	B2	Not rated	Total
Government bonds	8,738	-	9,910	-	2,499	1,138	10,287	46,394	3,499	-	1,648	1,707	230	-	86,050
Equity instruments and fund units	-	12	11	17	42	52	22	56	54	145	-	5	-	781	1,197
Corporate bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	753	753
Discounted Treasury bills	-	-	-	-	-	20	-	3,844	-	-	-	-	-	54	3,918
Mortgage bonds National Bank of Hungary bonds	-	-	-	93	-	-	-	-	-	-	-	-	-	9	102
Other interest bearing securities	-	-	-	-	-	173	-	4,287	472	1,183	-	-	-	2,838	8,953
Other non-interest bearing securities	=	=	=	=	=	=	=	=	=	=	=	=	=	982	982
<b>Total</b>	<b>8,738</b>	<b>12</b>	<b>9,921</b>	<b>110</b>	<b>2,541</b>	<b>1,383</b>	<b>10,309</b>	<b>63,459</b>	<b>4,025</b>	<b>1,328</b>	<b>1,648</b>	<b>1,712</b>	<b>230</b>	<b>408,941</b>	<b>514,357</b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.10. Financial instruments by Moody's rating categories [continued]****Non-trading instruments mandatorily at fair value through profit or loss**

<b>31/12/2025</b>	<b>Aa1</b>	<b>Aa3</b>	<b>A3</b>	<b>Baa2</b>	<b>Not rated</b>	<b>Total</b>
Non-trading equity instruments mandatorily at fair value through profit or loss	5,747	-	599	30,159	40,305	<b>76,810</b>
Non-trading debt instruments mandatorily at fair value through profit or loss	=	<u>338</u>	=	=	<u>714</u>	<u><b>1,052</b></u>
<b>Total</b>	<u><b>5,747</b></u>	<u><b>338</b></u>	<u><b>599</b></u>	<u><b>30,159</b></u>	<u><b>41,019</b></u>	<u><b>77,862</b></u>
<b>31/12/2024</b>	<b>Aaa</b>	<b>Aa3</b>	<b>A3</b>	<b>Baa2</b>	<b>Not rated</b>	<b>Total</b>
Non-trading equity instruments mandatorily at fair value through profit or loss	6,096	-	575	28,513	38,729	<b>73,913</b>
Non-trading debt instruments mandatorily at fair value through profit or loss	=	<u>839</u>	=	=	<u>1,778</u>	<u><b>2,617</b></u>
<b>Total</b>	<u><b>6,096</b></u>	<u><b>839</b></u>	<u><b>575</b></u>	<u><b>28,513</b></u>	<u><b>40,507</b></u>	<u><b>76,530</b></u>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.10. Financial instruments by Moody's rating categories [continued]****Securities at fair value through other comprehensive income**

31/12/2025	Aaa	Aa1	Aa2	Aa3	A1	A2	A3	Baa1	Baa2	Baa3	Ba2	Ba3	Ca	C	Not rated	WR <sup>1</sup>	Total
Government bonds	21,137	10,209	6,034	8,662	9,169	14,267	200,142	65,700	1,048,272	48,860	280,138	-	134,852	718	363	10,213	<b>1,858,736</b>
Corporate bonds	-	-	-	-	-	-	384	-	-	-	7,740	2,321	-	-	16,033	-	<b>26,478</b>
Mortgage bonds	7,945	-	-	374	12,456	-	-	-	-	-	-	-	-	-	9,392	-	<b>30,167</b>
Discounted																	
treasury bills	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,939	-	<b>2,939</b>
Other securities	349	-	-	-	-	773	5,700	-	-	-	24,404	-	-	-	4,967	-	<b>36,193</b>
Non-trading																	
equity instruments	=	=	=	51	=	=	36,096	=	=	=	=	=	=	=	55,754	=	<b>91,901</b>
<b>Total</b>	<b>29,431</b>	<b>10,209</b>	<b>6,034</b>	<b>9,087</b>	<b>21,625</b>	<b>15,040</b>	<b>242,322</b>	<b>65,700</b>	<b>1,048,272</b>	<b>48,860</b>	<b>312,282</b>	<b>2,321</b>	<b>134,852</b>	<b>718</b>	<b>89,448</b>	<b>10,213</b>	<b>2,046,414</b>

31/12/2024	Aaa	Aa1	Aa3	A1	A2	A3	Baa1	Baa2	Baa3	Ba1	Ba2	B1	Ca	Not rated	WR <sup>1</sup>	Total
Government bonds	40,673	2,275	10,356	8,665	19,924	207,629	115,964	245,858	81,623	-	296,786	102,780	155,135	-	24,395	<b>1,312,063</b>
Corporate bonds	-	833	822	-	-	2,056	-	-	-	7,326	5,866	-	-	10,140	-	<b>27,043</b>
Mortgage bonds	13,169	-	390	11,751	-	-	-	-	-	-	-	-	-	8,923	-	<b>34,233</b>
National Bank of Hungary bonds	-	-	-	-	-	-	-	205,050	-	-	-	-	-	-	-	<b>205,050</b>
Interest bearing																
treasury bills	-	-	-	-	-	-	-	86	-	-	-	-	-	-	-	<b>86</b>
Other securities	2,409	-	-	615	812	8,361	-	-	-	-	26,606	-	-	5,546	-	<b>44,349</b>
Non-trading																
equity instruments	=	=	10,143	=	=	27,003	=	=	=	=	=	=	=	45,583	=	<b>82,729</b>
<b>Total</b>	<b>56,251</b>	<b>3,108</b>	<b>21,711</b>	<b>21,031</b>	<b>20,736</b>	<b>245,049</b>	<b>115,964</b>	<b>450,994</b>	<b>81,623</b>	<b>7,326</b>	<b>329,258</b>	<b>102,780</b>	<b>155,135</b>	<b>70,192</b>	<b>24,395</b>	<b>1,705,553</b>

<sup>1</sup>: means withdrawn rating

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.1. Credit risk [continued]****37.1.10. Financial instruments by Moody's rating categories [continued]****Securities at amortized cost**

31/12/2025	Aaa	Aa1	Aa2	Aa3	A1	A2	A3	Baa1	Baa2	Baa3	Ba1	Ba2	B1	B3	Caa1	Ca	C	Not rated	WR <sup>1</sup>	Total
Government bonds	139,572	427,491	-	333,373	22,359	266,412	1,086,924	609,128	3,132,509	425,190	-	21,658	64,666	23,537	-	291,044	2,308	-	3,456	6,849,627
Corporate bonds	3,832	1,489	7,289	10,503	12,757	-	15,476	7,549	10,036	744	183	19,461	-	-	-	-	-	310,800	-	400,119
Bonds of Hungarian National Bank	-	-	-	-	-	-	-	-	154,842	-	-	-	-	-	-	-	-	-	-	154,842
Discounted Treasury bills	-	-	-	-	-	-	-	-	-	-	-	-	-	52,777	-	-	-	-	-	52,777
Mortgage bonds	1,918	-	-	-	18,083	-	-	-	-	-	-	-	-	-	-	-	-	12,015	-	32,016
Other securities	<u>76,544</u>	<u>-</u>	<u>38,921</u>	<u>47,853</u>	<u>126,449</u>	<u>39,975</u>	<u>44,012</u>	<u>22,263</u>	<u>15,786</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>1,635</u>	<u>-</u>	<u>-</u>	<u>22,646</u>	<u>-</u>	<u>436,084</u>
<b>Total</b>	<b><u>221,866</u></b>	<b><u>428,980</u></b>	<b><u>46,210</u></b>	<b><u>391,729</u></b>	<b><u>179,648</u></b>	<b><u>306,387</u></b>	<b><u>1,146,412</u></b>	<b><u>638,940</u></b>	<b><u>3,313,173</u></b>	<b><u>425,934</u></b>	<b><u>183</u></b>	<b><u>41,119</u></b>	<b><u>64,666</u></b>	<b><u>76,314</u></b>	<b><u>1,635</u></b>	<b><u>291,044</u></b>	<b><u>2,309</u></b>	<b><u>345,461</u></b>	<b><u>3,455</u></b>	<b><u>7,925,465</u></b>
31/12/2024	Aaa	Aa1	Aa2	Aa3	A1	A2	A3	Baa1	Baa2	Baa3	Ba1	Ba2	B1	B3	Caa1	Ca	C	Not rated	WR <sup>1</sup>	Total
Government bonds	630,724	101,890	8,160	215,094	1,224	213,019	816,635	645,168	2,892,326	383,412	-	23,728	87,987	51,204	-	308,362	2,510	-	7,211	6,388,654
Corporate bonds	1,980	1,549	6,944	12,634	4,093	4,422	14,500	15,729	15,942	774	581	-	-	-	-	-	-	264,506	-	343,654
Discounted Treasury bills	-	-	-	-	-	-	-	22	92,894	-	-	-	-	43,535	-	-	-	-	-	136,451
Mortgage bonds	2,077	-	-	-	18,057	-	-	-	-	-	-	-	-	-	-	-	-	11,847	-	31,981
Interest bearing Treasury bills	-	-	-	-	-	-	-	-	-	-	-	-	1,658	-	-	-	-	-	-	1,658
Other securities	<u>87,011</u>	<u>-</u>	<u>27,855</u>	<u>56,856</u>	<u>119,230</u>	<u>53,358</u>	<u>65,109</u>	<u>48,363</u>	<u>16,259</u>	<u>14,507</u>	<u>2,517</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>1,628</u>	<u>-</u>	<u>-</u>	<u>52,086</u>	<u>-</u>	<u>544,779</u>
<b>Total</b>	<b><u>721,792</u></b>	<b><u>103,439</u></b>	<b><u>42,959</u></b>	<b><u>284,584</u></b>	<b><u>142,604</u></b>	<b><u>270,799</u></b>	<b><u>896,244</u></b>	<b><u>709,282</u></b>	<b><u>3,017,421</u></b>	<b><u>398,693</u></b>	<b><u>3,098</u></b>	<b><u>23,728</u></b>	<b><u>89,645</u></b>	<b><u>94,739</u></b>	<b><u>1,628</u></b>	<b><u>308,362</u></b>	<b><u>2,510</u></b>	<b><u>328,439</u></b>	<b><u>7,211</u></b>	<b><u>7,447,177</u></b>

<sup>1</sup>: means withdrawn rating

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.2. Maturity analysis of financial assets and liabilities**

Liquidity risk is a measure of the extent to which the Group may be required to raise funds to meet its commitments associated with financial instruments. The Group maintains its liquidity position in accordance with regulations prescribed by the NBH.

The essential aspect of the liquidity risk management strategy is to identify all relevant systemic and idiosyncratic sources of liquidity risk and to measure the probability and severity of such events. During liquidity risk management the Group considers the effect of liquidity risk events caused by reasons arising in the bank business line (deposit withdrawal), the national economy (exchange rate shock yield curve shock) and the global financial system (capital market shock).

In line with the Group's risk management policy liquidity risks are measured and managed on multiply hierarchy levels and applying integrated unified VaR based methodology. The basic requirement is that the Group must keep high quality liquidity reserves which means it can fulfill all liabilities when they fall due without material additional costs.

The liquidity reserves can be divided in two parts. There are separate decentralized liquid asset portfolios at subsidiary level and a centralized flexible liquidity pool at a Group level. The reserves at subsidiary levels are held to cover the relevant shocks of the subsidiaries which may arise in local currencies (deposit withdrawal, local capital market shock, unexpected business expansion), while the centralized liquidity pool is held to cover the Bank's separate shocks (deposit-, yield curve- and exchange rate shocks) and all group member's potential shocks that may arise in foreign currencies (deposit withdrawal, capital market shock).

The recalculation of shocks is made at least quarterly while the recalibration of shock measurement models and review of the risk management methodology is an annual process. The monitoring of liquidity reserves for both centralized and decentralized liquid asset portfolio has been built into the daily reporting process.

Due to the balance sheet adjustment process (deleveraging) experienced in the last few years, the liquidity reserves of the Group increased significantly while the liquidity risk exposure has decreased considerably. Currently the (over)coverage of potential liquidity risk exposure by high quality liquid assets is high. There were no material changes in the liquidity risk management process for the year ended 31 December 2025.

The contractual amounts disclosed in the maturity analyses are the contractual undiscounted cash flows like gross finance lease obligations (before deducting finance charges); prices specified in forward agreements to purchase financial assets for cash; net amounts for pay-floating/receive-fixed interest rate swaps for which net cash flows are exchanged; contractual amounts to be exchanged in a derivative financial instrument for which gross cash flows are exchanged; gross loan commitments.

Such undiscounted cash flows differ from the amount included in the Consolidated Statement of Financial Position because the amount in that statement is based on discounted cash flows. When the amount payable is not fixed, the amount disclosed is determined by reference to the conditions existing at the end of the reporting period. For example, when the amount payable varies with changes in an index, the amount disclosed may be based on the level of the index at the end of the period.

The following tables provide an analysis of assets and liabilities about the non-discounted cash flow into relevant maturity groupings based on the remaining period from the balance sheet date to the contractual maturity date. It is presented under the most prudent consideration of maturity dates where options or repayment schedules allow for early repayment possibilities.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.2. Maturity analysis of financial assets and liabilities [continued]**

31/12/2025	Within 3 months	Within one year and over 3 months	Within 5 years and over one year	Over 5 years	Without maturity	Total
Cash, amounts due from banks and balances with the National Banks	4,967,278	120	82	-	-	<b>4,967,480</b>
Placements with other banks	1,696,123	658	114,429	191,776	1,844	<b>2,004,830</b>
Repo receivables	238,110	84	26	-	-	<b>238,220</b>
Trading securities at fair value through profit or loss	67,733	30,793	86,993	42,571	1,444	<b>229,534</b>
Non-trading instruments mandatorily at fair value through profit or loss	6,536	-	-	-	58,599	<b>65,135</b>
Securities at fair value through other comprehensive income	159,370	240,005	1,100,429	686,858	160,677	<b>2,347,339</b>
Securities at amortized cost	1,132,120	1,207,455	2,813,783	3,449,844	-	<b>8,603,202</b>
Loans at amortized cost	2,772,482	4,546,852	9,268,664	9,959,179	5	<b>26,547,182</b>
Finance lease receivable	142,431	366,863	1,111,488	109,860	-	<b>1,730,642</b>
Loans mandatorily at fair value through profit or loss	48,414	57,952	331,396	1,418,927	-	<b>1,856,689</b>
Associates and other investments	-	-	-	-	164,172	<b>164,172</b>
Other financial assets <sup>1</sup>	<u>298,154</u>	<u>13,947</u>	<u>20,317</u>	<u>391</u>	<u>10,481</u>	<u><b>343,290</b></u>
<b>TOTAL ASSETS</b>	<b><u>11,528,751</u></b>	<b><u>6,464,729</u></b>	<b><u>14,847,607</u></b>	<b><u>15,859,406</u></b>	<b><u>397,222</u></b>	<b><u>49,097,715</u></b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks	333,687	140,250	612,878	549,190	-	<b>1,636,005</b>
Repo liabilities	166,725	33	51	-	-	<b>166,809</b>
Financial liabilities designated at fair value through profit or loss	527	1,047	4,877	84,092	-	<b>90,543</b>
Deposits from customers <sup>2</sup>	31,469,336	1,755,700	540,804	50,259	-	<b>33,816,099</b>
Liabilities from issued securities	64,543	124,782	2,037,651	323,888	-	<b>2,550,864</b>
Leasing liabilities	4,354	11,817	34,606	39,918	-	<b>90,695</b>
Other financial liabilities <sup>1</sup>	615,794	46,958	28,273	428	6,377	<b>697,830</b>
Subordinated bonds and loans	<u>6,420</u>	<u>-</u>	<u>13,716</u>	<u>463,371</u>	<u>-</u>	<u><b>483,507</b></u>
<b>TOTAL LIABILITIES</b>	<b><u>32,661,386</u></b>	<b><u>2,080,587</u></b>	<b><u>3,272,856</u></b>	<b><u>1,511,146</u></b>	<b><u>6,377</u></b>	<b><u>39,532,352</u></b>
<b>NET POSITION<sup>3</sup></b>	<b><u>(21,132,635)</u></b>	<b><u>4,384,142</u></b>	<b><u>11,574,751</u></b>	<b><u>14,348,260</u></b>	<b><u>390,845</u></b>	<b><u>9,565,363</u></b>

<sup>1</sup> Without derivative financial instruments.

<sup>2</sup> Deposit from customers includes the fair value changes on hedged deposits involved in portfolio hedge of interest rate risk.

<sup>3</sup> Analysis for net position of assets and liabilities are calculated in accordance with IFRS 7, therefore certain financial instruments are presented in the earliest period in which the Group could be required to pay. On-demand deposits are presented in the earliest (within 3 month) period category, however based on the Management's discretion the Group has appropriate liquidity reserves as maintenance and management of liquidity risk.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.2. Maturity analysis of financial assets and liabilities [continued]**

31/12/2025	Within 3 months	Within one year and over 3 months	Within 5 years and over one year	Over 5 years	Without maturity	Total
Receivables from derivative financial instruments held for trading	7,380,552	1,529,962	509,214	83,561	-	<b>9,503,289</b>
Liabilities from derivative financial instruments held for trading	<u>(7,365,387)</u>	<u>(1,517,047)</u>	<u>(439,315)</u>	<u>(77,941)</u>	=	<b><u>(9,399,690)</u></b>
<b>Net position of financial instruments held for trading</b>	<b><u>15,165</u></b>	<b><u>12,915</u></b>	<b><u>69,899</u></b>	<b><u>5,620</u></b>	=	<b><u>103,599</u></b>
Receivables from derivative financial instruments designated as hedge accounting	50,827	197,431	1,278,039	54,544	-	<b>1,580,841</b>
Liabilities from derivative financial instruments designated as hedge accounting	<u>(49,462)</u>	<u>(196,021)</u>	<u>(1,281,254)</u>	<u>(49,965)</u>	=	<b><u>(1,576,702)</u></b>
<b>Net position of financial instruments designated as hedge accounting</b>	<b><u>1,365</u></b>	<b><u>1,410</u></b>	<b><u>(3,215)</u></b>	<b><u>4,579</u></b>	=	<b><u>4,139</u></b>
<b>Net position of derivative financial instruments total</b>	<b><u>16,530</u></b>	<b><u>14,325</u></b>	<b><u>66,684</u></b>	<b><u>10,199</u></b>	=	<b><u>107,738</u></b>
Commitments to extend credit	5,300,209	738,951	322,957	95,329	4	<b>6,457,450</b>
Bank guarantees	786,775	383,311	306,332	131,250	-	<b>1,607,668</b>
Confirmed letters of credit	43,380	12,120	-	-	-	<b>55,500</b>
Factoring loan commitment	443,443	1,719	-	-	-	<b>445,162</b>
Other commitments	<u>128,224</u>	<u>177,712</u>	<u>165,887</u>	<u>148,489</u>	=	<b><u>620,312</u></b>
<b>Off-balance sheet commitments</b>	<b><u>6,702,031</u></b>	<b><u>1,313,813</u></b>	<b><u>795,176</u></b>	<b><u>375,068</u></b>	<b>4</b>	<b><u>9,186,092</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.2. Maturity analysis of financial assets and liabilities [continued]**

31/12/2024	Within 3 months	Within one year and over 3 months	Within 5 years and over one year	Over 5 years	Without maturity	Total
Cash, amounts due from banks and balances with the National Banks	6,081,452	149	-	-	-	<b>6,081,601</b>
Placements with other banks	1,573,903	55,598	167,564	105,797	1,811	<b>1,904,673</b>
Repo receivables	332,369	-	-	-	-	<b>332,369</b>
Trading securities at fair value through profit or loss	435,363	10,204	44,540	25,888	377	<b>516,372</b>
Non-trading instruments mandatorily at fair value through profit or loss	6,671	-	-	-	57,543	<b>64,214</b>
Securities at fair value through other comprehensive income	308,098	204,069	980,059	262,531	158,247	<b>1,913,004</b>
Securities at amortized cost	710,483	1,055,389	3,288,055	2,898,233	-	<b>7,952,160</b>
Loans at amortized cost	2,547,329	4,315,757	8,552,986	8,516,428	-	<b>23,932,500</b>
Finance lease receivable	148,644	356,068	1,063,186	105,855	-	<b>1,673,753</b>
Loans mandatorily at fair value through profit or loss	36,245	44,927	256,515	1,132,775	-	<b>1,470,462</b>
Associates and other investments	-	-	-	-	134,728	<b>134,728</b>
Other financial assets <sup>1</sup>	<u>316,678</u>	<u>7,435</u>	<u>13,558</u>	<u>283</u>	<u>1,273</u>	<u><b>339,227</b></u>
<b>TOTAL ASSETS</b>	<b><u>12,497,235</u></b>	<b><u>6,049,596</u></b>	<b><u>14,366,463</u></b>	<b><u>13,047,790</u></b>	<b><u>353,979</u></b>	<b><u>46,315,063</u></b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks	407,594	506,520	629,096	627,990	-	<b>2,171,200</b>
Repo liabilities	132,122	15	-	-	-	<b>132,137</b>
Financial liabilities designated at fair value through profit or loss	650	1,059	5,130	65,627	-	<b>72,466</b>
Deposits from customers <sup>2</sup>	29,551,220	1,723,312	430,297	53,913	-	<b>31,758,742</b>
Liabilities from issued securities	65,947	224,388	2,034,050	316,132	-	<b>2,640,517</b>
Leasing liabilities	4,177	11,022	38,641	32,261	-	<b>86,101</b>
Other financial liabilities <sup>1</sup>	717,826	40,698	26,643	60	2,181	<b>787,408</b>
Subordinated bonds and loans	<u>76</u>	<u>9,597</u>	<u>7,360</u>	<u>361,046</u>	<u>-</u>	<u><b>378,079</b></u>
<b>TOTAL LIABILITIES</b>	<b><u>30,879,612</u></b>	<b><u>2,516,611</u></b>	<b><u>3,171,217</u></b>	<b><u>1,457,029</u></b>	<b><u>2,181</u></b>	<b><u>38,026,650</u></b>
<b>NET POSITION<sup>3</sup></b>	<b><u>(18,382,377)</u></b>	<b><u>3,532,985</u></b>	<b><u>11,195,246</u></b>	<b><u>11,590,761</u></b>	<b><u>351,798</u></b>	<b><u>8,288,413</u></b>

<sup>1</sup> Without derivative financial instruments<sup>2</sup> Deposit from customers includes the fair value changes on hedged deposits involved in portfolio hedge of interest rate risk.<sup>3</sup> Analysis for net position of assets and liabilities are calculated in accordance with IFRS 7, therefore certain financial instruments are presented in the earliest period in which the Group could be required to pay. On-demand deposits are presented in the earliest (within 3 month) period category, however based on the Management's discretion the Group has appropriate liquidity reserves as maintenance and management of liquidity risk.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.2. Maturity analysis of financial assets and liabilities [continued]**

31/12/2024	Within 3 months	Within one year and over 3 months	Within 5 years and over one year	Over 5 years	Without maturity	Total
Receivables from derivative financial instruments held for trading	5,850,423	1,437,108	672,271	59,398	-	<b>8,019,200</b>
Liabilities from derivative financial instruments held for trading	<u>(5,875,018)</u>	<u>(1,461,135)</u>	<u>(678,939)</u>	<u>(63,456)</u>	=	<b>(8,078,548)</b>
<b>Net position of financial instruments held for trading</b>	<b><u>(24,595)</u></b>	<b><u>(24,027)</u></b>	<b><u>(6,668)</u></b>	<b><u>(4,058)</u></b>	=	<b><u>(59,348)</u></b>
Receivables from derivative financial instruments designated as hedge accounting	39,945	242,697	873,658	25,923	-	<b>1,182,223</b>
Liabilities from derivative financial instruments designated as hedge accounting	<u>(30,267)</u>	<u>(242,235)</u>	<u>(819,664)</u>	<u>(18,919)</u>	=	<b><u>(1,111,085)</u></b>
<b>Net position of financial instruments designated as hedge accounting</b>	<b><u>9,678</u></b>	<b><u>462</u></b>	<b><u>53,994</u></b>	<b><u>7,004</u></b>	=	<b><u>71,138</u></b>
<b>Net position of derivative financial instruments total</b>	<b><u>(14,917)</u></b>	<b><u>(23,565)</u></b>	<b><u>47,326</u></b>	<b><u>2,946</u></b>	=	<b><u>11,790</u></b>
Commitments to extend credit	4,703,379	650,088	255,927	84,409	-	<b>5,693,803</b>
Bank guarantees	687,488	333,929	380,441	145,521	-	<b>1,547,379</b>
Confirmed letters of credit	26,331	6,973	7,816	-	-	<b>41,120</b>
Factoring loan commitment	466,323	1,616	-	-	-	<b>467,939</b>
Other commitments	<u>122,059</u>	<u>170,113</u>	<u>173,083</u>	<u>65,167</u>	=	<b><u>530,422</u></b>
<b>Off-balance sheet commitments</b>	<b><u>6,005,580</u></b>	<b><u>1,162,719</u></b>	<b><u>817,267</u></b>	<b><u>295,097</u></b>	=	<b><u>8,280,663</u></b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.3. Net foreign currency position and foreign currency risk**

<b>31/12/2025</b>	<b>USD</b>	<b>EUR</b>	<b>CHF</b>	<b>Other</b>	<b>Total</b>
Assets	1,242,330	16,530,872	51,312	13,357,791	<b>31,182,305</b>
Liabilities	(2,003,403)	(14,719,322)	(161,358)	(11,272,861)	<b>(28,156,944)</b>
Derivative financial instruments	<u>794,543</u>	<u>(288,999)</u>	<u>110,387</u>	<u>32,689</u>	<u><b>648,620</b></u>
<b>Net position</b>	<u><b>33,470</b></u>	<u><b>1,522,551</b></u>	<u><b>341</b></u>	<u><b>2,117,619</b></u>	<u><b>3,673,981</b></u>
<b>31/12/2024</b>	<b>USD</b>	<b>EUR</b>	<b>CHF</b>	<b>Other</b>	<b>Total</b>
Assets	1,530,210	17,126,367	80,020	11,582,268	<b>30,318,865</b>
Liabilities	(2,036,244)	(15,307,447)	(166,380)	(9,749,648)	<b>(27,259,719)</b>
Derivative financial instruments	<u>426,671</u>	<u>(118,045)</u>	<u>85,845</u>	<u>(47,804)</u>	<u><b>346,667</b></u>
<b>Net position</b>	<u><b>(79,363)</b></u>	<u><b>1,700,875</b></u>	<u><b>(515)</b></u>	<u><b>1,784,816</b></u>	<u><b>3,405,813</b></u>

The table above provides an analysis of the main foreign currency exposures of the Group that arise in the non-functional currency of the entities constituting the Group. The remaining foreign currencies are shown within 'Others'. 'Others' category contains mainly foreign currencies in RSD, UAH, RUB, BGN, ALL, MDL and UZS. The Group monitors its foreign exchange position for compliance with the regulatory requirements of the National Banks and its own limit system established in respect of limits on open positions. The measurement of the open foreign currency position of the Group involves monitoring the "VaR" limit on the foreign exchange exposure of the Group. The derivative financial instruments detailed in the table above are presented at fair value.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management**

Interest rate risk is the risk that the value of a financial instrument will fluctuate due to changes in market interest rates. The length of time for which the rate of interest is fixed on a financial instrument, therefore, indicates to what extent it is exposed to interest rate risk.

The majority of the interest-bearing assets and liabilities of the Group are structured to match either short-term assets and short-term liabilities, or long-term assets and liabilities with repricing opportunities within one year, or long-term assets and corresponding liabilities where repricing is performed simultaneously.

In addition, the significant spread existing between the different types of interest-bearing assets and liabilities enables the Group to benefit from a high level of flexibility in adjusting for its interest rate matching and interest rate risk exposure.

The following table presents the interest repricing periods of the assets and liabilities. Variable yield assets and liabilities have been reported in accordance with their next repricing date. Fixed income assets and liabilities have been reported in accordance with their maturity.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2025

ASSETS	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest-bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Cash, amounts due from banks and balances with the</b>															
<b>National Banks</b>	<b>9,527</b>	<b>1,877,027</b>	-	<b>1</b>	-	<b>71</b>	-	-	-	<b>1</b>	<b>1,164,754</b>	<b>1,914,254</b>	<b>1,174,281</b>	<b>3,791,354</b>	<b>4,965,635</b>
fixed rate	2,027	1,739,417	-	1	-	71	-	-	-	1	-	-	2,027	1,739,490	1,741,517
variable rate	7,500	137,610	-	-	-	-	-	-	-	-	-	-	7,500	137,610	145,110
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	1,164,754	1,914,254	1,164,754	1,914,254	3,079,008
<b>Placements with other banks</b>	<b>219,084</b>	<b>1,292,132</b>	<b>48,485</b>	<b>52,286</b>	-	<b>19,981</b>	-	<b>472</b>	-	<b>42,215</b>	<b>60,496</b>	<b>256,338</b>	<b>328,065</b>	<b>1,663,424</b>	<b>1,991,489</b>
fixed rate	354	1,024,890	-	45,682	-	10,346	-	472	-	40,283	-	-	354	1,121,673	1,122,027
variable rate	218,730	267,242	48,485	6,604	-	9,635	-	-	-	1,932	-	-	267,215	285,413	552,628
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	60,496	256,338	60,496	256,338	316,834
<b>Repo receivables</b>	<b>150,542</b>	<b>20,139</b>	<b>61,412</b>	<b>4,839</b>	-	<b>84</b>	-	<b>4</b>	-	-	-	<b>124</b>	<b>211,954</b>	<b>25,190</b>	<b>237,144</b>
fixed rate	150,542	20,139	61,412	4,817	-	84	-	4	-	-	-	-	211,954	25,044	236,998
variable rate	-	-	-	22	-	-	-	-	-	-	-	-	-	22	22
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	124	-	124	124
<b>Trading instruments at fair value</b>															
<b>through profit or loss</b>	<b>52,742</b>	<b>6,769</b>	<b>14,260</b>	<b>4,476</b>	<b>32,551</b>	<b>5,271</b>	<b>894</b>	<b>15,147</b>	<b>62,530</b>	<b>29,355</b>	<b>559</b>	<b>2,206</b>	<b>163,536</b>	<b>63,224</b>	<b>226,760</b>
fixed rate	49,614	6,730	143	4,476	18,907	5,271	894	15,147	61,011	29,355	-	-	130,569	60,979	191,548
variable rate	3,128	39	14,117	-	13,644	-	-	-	1,519	-	-	-	32,408	39	32,447
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	559	2,206	559	2,206	2,765
<b>Non-trading instruments mandatorily at fair value through profit or loss</b>	-	-	-	-	-	-	-	-	-	-	-	-	<b>53,541</b>	<b>24,321</b>	<b>77,862</b>
fixed rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
variable rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	-	53,541	24,321	77,862

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2025 [continued]

ASSETS [continued]	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest- bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Securities at fair value through other comprehensive income</b>	<b>215,379</b>	<b>50,082</b>	<b>3,099</b>	<b>94,341</b>	<b>86,479</b>	<b>135,797</b>	<b>21,857</b>	<b>136,304</b>	<b>730,652</b>	<b>480,523</b>	<b>404</b>	<b>91,497</b>	<b>1,057,870</b>	<b>988,544</b>	<b>2,046,414</b>
fixed rate	-	50,082	930	94,177	86,479	135,797	21,857	136,304	730,652	472,783	-	-	839,918	889,143	1,729,061
variable rate	215,379	-	2,169	164	-	-	-	-	-	7,740	-	-	217,548	7,904	225,452
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	404	91,497	404	91,497	91,901
<b>Securities at amortized cost</b>	<b>13,419</b>	<b>670,850</b>	<b>40,276</b>	<b>308,035</b>	<b>772,012</b>	<b>527,558</b>	<b>317,590</b>	<b>325,327</b>	<b>1,857,472</b>	<b>2,912,278</b>	<b>154,844</b>	<b>25,804</b>	<b>3,155,613</b>	<b>4,769,852</b>	<b>7,925,465</b>
fixed rate	3,345	670,850	-	304,563	772,012	527,558	317,590	325,327	1,856,972	2,912,278	-	-	2,949,919	4,740,576	7,690,495
variable rate	10,074	-	40,276	3,472	-	-	-	-	500	-	-	-	50,850	3,472	54,322
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	154,844	25,804	154,844	25,804	180,648
<b>Loans at amortized cost, net of allowance for loan losses</b>	<b>1,069,392</b>	<b>8,916,404</b>	<b>437,981</b>	<b>2,473,380</b>	<b>258,040</b>	<b>1,865,469</b>	<b>143,168</b>	<b>850,656</b>	<b>2,258,144</b>	<b>3,714,530</b>	<b>147,427</b>	<b>164,987</b>	<b>4,314,152</b>	<b>17,985,426</b>	<b>22,299,578</b>
fixed rate	33,875	2,142,953	5,354	291,841	85,634	977,575	123,186	831,313	1,826,972	3,250,952	-	-	2,075,021	7,494,634	9,569,655
variable rate	1,035,517	6,773,451	432,627	2,181,539	172,406	887,894	19,982	19,343	431,172	463,578	-	-	2,091,704	10,325,805	12,417,509
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	147,427	164,987	147,427	164,987	312,414
<b>Finance lease receivables</b>	<b>4,399</b>	<b>105,321</b>	<b>5,012</b>	<b>107,324</b>	<b>35,692</b>	<b>223,302</b>	<b>62,998</b>	<b>207,594</b>	<b>340,805</b>	<b>489,012</b>	<b>80</b>	<b>7,011</b>	<b>448,986</b>	<b>1,139,564</b>	<b>1,588,550</b>
fixed rate	2,464	8,470	2,850	34,937	23,971	84,308	58,849	99,914	310,510	306,240	-	-	398,644	533,869	932,513
variable rate	1,935	96,851	2,162	72,387	11,721	138,994	4,149	107,680	30,295	182,772	-	-	50,262	598,684	648,946
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	80	7,011	80	7,011	7,091
<b>Loans mandatorily at fair value through profit or loss</b>	<b>72,251</b>	<b>-</b>	<b>93,450</b>	<b>-</b>	<b>591,500</b>	<b>-</b>	<b>233,828</b>	<b>-</b>	<b>948,518</b>	<b>1,675</b>	<b>-</b>	<b>-</b>	<b>1,939,547</b>	<b>1,675</b>	<b>1,941,222</b>
fixed rate	-	-	-	-	-	-	-	-	-	1,675	-	-	-	1,675	1,675
variable rate	72,251	-	93,450	-	591,500	-	233,828	-	948,518	-	-	-	1,939,547	-	1,939,547
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Fair value adjustment of derivative financial instruments</b>	<b>1,095,482</b>	<b>253,192</b>	<b>897,520</b>	<b>1,874,228</b>	<b>644,795</b>	<b>818,800</b>	<b>26,139</b>	<b>122,469</b>	<b>728,160</b>	<b>378,991</b>	<b>26,547</b>	<b>1,727,363</b>	<b>3,418,643</b>	<b>5,175,043</b>	<b>8,593,686</b>
fixed rate	1,034,293	166,602	367,301	878,764	301,704	515,145	26,139	119,197	728,160	378,865	-	-	2,457,597	2,058,573	4,516,170
variable rate	61,189	86,590	530,219	995,464	343,091	303,655	-	3,272	-	126	-	-	934,499	1,389,107	2,323,606
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	26,547	1,727,363	26,547	1,727,363	1,753,910
<b>Other financial assets</b>	<b>168</b>	<b>33,327</b>	<b>25</b>	<b>2,458</b>	<b>-</b>	<b>5</b>	<b>-</b>	<b>1</b>	<b>-</b>	<b>169</b>	<b>73,527</b>	<b>178,700</b>	<b>73,720</b>	<b>214,660</b>	<b>288,380</b>
fixed rate	168	29,556	25	2,446	-	5	-	1	-	166	-	-	193	32,174	32,367
variable rate	-	3,771	-	12	-	-	-	-	-	3	-	-	-	3,786	3,786
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	73,527	178,700	73,527	178,700	252,227

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2025 [continued]

LIABILITIES	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest- bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Amounts due to banks, the National Governments, deposits from the National Banks and other banks</b>	<b>11,503</b>	<b>180,801</b>	<b>14,575</b>	<b>89,738</b>	<b>76,380</b>	<b>74,025</b>	<b>29,136</b>	<b>129,905</b>	<b>237,892</b>	<b>523,229</b>	<b>45,712</b>	<b>78,025</b>	<b>415,198</b>	<b>1,075,723</b>	<b>1,490,921</b>
fixed rate	10,751	57,041	14,331	9,329	76,380	21,558	26,080	106,776	237,892	493,233	-	-	365,434	687,937	1,053,371
variable rate	752	123,760	244	80,409	-	52,467	3,056	23,129	-	29,996	-	-	4,052	309,761	313,813
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	45,712	78,025	45,712	78,025	123,737
<b>Repo liabilities</b>	<b>50,093</b>	<b>116,184</b>	-	<b>448</b>	-	-	-	-	-	<b>84</b>	-	-	<b>50,093</b>	<b>116,716</b>	<b>166,809</b>
fixed rate	50,093	116,184	-	448	-	-	-	-	-	84	-	-	50,093	116,716	166,809
variable rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Financial liabilities designated at fair value through profit or loss</b>	<b>15,271</b>	-	-	-	<b>8</b>	-	-	-	<b>1,456</b>	-	<b>73,605</b>	-	<b>90,340</b>	-	<b>90,340</b>
fixed rate	-	-	-	-	8	-	-	-	-	-	-	-	8	-	8
variable rate	15,271	-	-	-	-	-	-	-	1,456	-	-	-	16,727	-	16,727
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	73,605	-	73,605	-	73,605
<b>Deposits from customers<sup>1</sup></b>	<b>8,295,631</b>	<b>21,510,035</b>	<b>529,214</b>	<b>1,101,244</b>	<b>102,661</b>	<b>1,379,962</b>	<b>53,412</b>	<b>143,056</b>	<b>114,261</b>	<b>202,274</b>	<b>23,400</b>	<b>279,117</b>	<b>9,118,579</b>	<b>24,615,688</b>	<b>33,734,267</b>
fixed rate	1,167,579	9,529,728	136,401	1,088,107	102,641	1,362,221	53,412	142,287	114,261	199,114	-	-	1,574,294	12,321,457	13,895,751
variable rate	7,128,052	11,980,307	392,813	13,137	20	17,741	-	769	-	3,160	-	-	7,520,885	12,015,114	19,535,999
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	23,400	279,117	23,400	279,117	302,517
<b>Liabilities from issued securities</b>	<b>202,772</b>	<b>4,429</b>	<b>17,569</b>	-	<b>114,003</b>	-	<b>72,780</b>	<b>540,663</b>	<b>73,207</b>	<b>1,480,490</b>	-	<b>6,722</b>	<b>480,331</b>	<b>2,032,304</b>	<b>2,512,635</b>
fixed rate	10,802	4,429	17,569	-	114,003	-	72,780	540,663	73,207	1,480,490	-	-	288,361	2,025,582	2,313,943
variable rate	191,970	-	-	-	-	-	-	-	-	-	-	-	191,970	-	191,970
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	6,722	-	6,722	6,722

<sup>1</sup>Deposit from customers includes the fair value changes on hedged deposits involved in portfolio hedge of interest rate risk.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2025 [continued]

LIABILITIES [continued]	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest- bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Fair value adjustment of derivative financial instruments</b>	<b>1,799,213</b>	<b>208,762</b>	<b>1,362,550</b>	<b>1,352,483</b>	<b>472,949</b>	<b>929,500</b>	<b>34,257</b>	<b>47,804</b>	<b>534,141</b>	<b>653,790</b>	<b>416,585</b>	<b>724,202</b>	<b>4,619,695</b>	<b>3,916,541</b>	<b>8,536,236</b>
fixed rate	1,765,338	95,616	664,548	580,830	301,666	470,607	34,257	47,190	533,201	653,790	-	-	3,299,010	1,848,033	5,147,043
variable rate	33,875	113,146	698,002	771,653	171,283	458,893	-	614	940	-	-	-	904,100	1,344,306	2,248,406
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	416,585	724,202	416,585	724,202	1,140,787
<b>Leasing liabilities</b>	<b>8</b>	<b>1,072</b>	<b>24</b>	<b>2,000</b>	<b>154</b>	<b>11,482</b>	<b>305</b>	<b>11,666</b>	<b>919</b>	<b>52,127</b>	<b>242</b>	<b>2,402</b>	<b>1,652</b>	<b>80,749</b>	<b>82,401</b>
fixed rate	-	622	8	850	86	7,088	191	6,463	919	21,974	-	-	1,204	36,997	38,201
variable rate	8	450	16	1,150	68	4,394	114	5,203	-	30,153	-	-	206	41,350	41,556
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	242	2,402	242	2,402	2,644
<b>Other financial liabilities</b>	<b>146</b>	<b>37,050</b>	<b>870</b>	<b>267</b>	<b>-</b>	<b>2,577</b>	<b>-</b>	<b>225</b>	<b>-</b>	<b>347</b>	<b>437,066</b>	<b>293,837</b>	<b>438,082</b>	<b>334,303</b>	<b>772,385</b>
fixed rate	146	36,948	870	61	-	2,143	-	225	-	321	-	-	1,016	39,698	40,714
variable rate	-	102	-	206	-	434	-	-	-	26	-	-	-	768	768
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	437,066	293,837	437,066	293,837	730,903
<b>Subordinated bonds and loans</b>	<b>-</b>	<b>24</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>480,040</b>	<b>-</b>	<b>6,020</b>	<b>-</b>	<b>486,084</b>	<b>486,084</b>
fixed rate	-	24	-	-	-	-	-	-	-	480,040	-	-	-	480,064	480,064
variable rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	6,020	-	6,020	6,020
<b>Net position</b>	<b>(7,472,252)</b>	<b>(8,833,114)</b>	<b>(323,282)</b>	<b>2,375,188</b>	<b>1,654,914</b>	<b>1,198,792</b>	<b>616,584</b>	<b>784,655</b>	<b>5,964,405</b>	<b>4,656,368</b>	<b>685,569</b>	<b>3,002,280</b>	<b>1,125,938</b>	<b>3,184,169</b>	<b>4,310,107</b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2024

ASSETS	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest- bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Cash, amounts due from banks and balances with the</b>															
<b>National Banks</b>	<b>1,409,105</b>	<b>2,745,110</b>	<b>10</b>	<b>534</b>	-	<b>689</b>	-	-	-	<b>1</b>	<b>232,060</b>	<b>1,691,503</b>	<b>1,641,175</b>	<b>4,437,837</b>	<b>6,079,012</b>
fixed rate	1,402,976	2,509,429	2	534	-	689	-	-	-	1	-	-	1,402,978	2,510,653	3,913,631
variable rate	6,129	235,681	8	-	-	-	-	-	-	-	-	-	6,137	235,681	241,818
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	232,060	1,691,503	232,060	1,691,503	1,923,563
<b>Placements with other banks</b>	<b>203,611</b>	<b>1,168,594</b>	<b>32,057</b>	<b>83,994</b>	<b>1</b>	<b>54,955</b>	-	<b>4,183</b>	<b>1,344</b>	<b>64,992</b>	<b>55,057</b>	<b>223,113</b>	<b>292,070</b>	<b>1,599,831</b>	<b>1,891,901</b>
fixed rate	15,176	1,032,986	-	83,825	1	54,955	-	4,183	1,344	63,298	-	-	16,521	1,239,247	1,255,768
variable rate	188,435	135,608	32,057	169	-	-	-	-	-	1,694	-	-	220,492	137,471	357,963
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	55,057	223,113	55,057	223,113	278,170
<b>Repo receivables</b>	<b>139,427</b>	<b>192,276</b>	-	-	-	-	-	-	-	-	-	<b>134</b>	<b>139,427</b>	<b>192,410</b>	<b>331,837</b>
fixed rate	139,427	192,276	-	-	-	-	-	-	-	-	-	-	139,427	192,276	331,703
variable rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	134	-	134	134
<b>Trading instruments at fair value through profit or loss</b>	<b>417,158</b>	<b>4,811</b>	<b>1,149</b>	<b>9,462</b>	<b>5,236</b>	<b>9,679</b>	<b>525</b>	<b>9,183</b>	<b>36,602</b>	<b>18,373</b>	<b>450</b>	<b>1,729</b>	<b>461,120</b>	<b>53,237</b>	<b>514,357</b>
fixed rate	415,465	4,757	214	9,462	4,109	9,679	525	9,183	36,602	18,373	-	-	456,915	51,454	508,369
variable rate	1,693	54	935	-	1,127	-	-	-	-	-	-	-	3,755	54	3,809
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	450	1,729	450	1,729	2,179
<b>Non-trading instruments mandatorily at fair value through profit or loss</b>	-	-	-	-	-	-	-	-	-	-	<b>49,547</b>	<b>26,983</b>	<b>49,547</b>	<b>26,983</b>	<b>76,530</b>
fixed rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
variable rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	49,547	26,983	49,547	26,983	76,530

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2024 [continued]

ASSETS [continued]	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest- bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Securities at fair value through other comprehensive income</b>	<b>312,048</b>	<b>12,489</b>	<b>281</b>	<b>59,022</b>	<b>91,839</b>	<b>171,975</b>	<b>127</b>	<b>211,180</b>	<b>197,315</b>	<b>566,548</b>	<b>403</b>	<b>82,326</b>	<b>602,013</b>	<b>1,103,540</b>	<b>1,705,553</b>
fixed rate	301,641	12,489	36	59,022	91,839	167,846	127	209,442	197,315	566,548	-	-	590,958	1,015,347	1,606,305
variable rate	10,407	-	245	-	-	4,129	-	1,738	-	-	-	-	10,652	5,867	16,519
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	403	82,326	403	82,326	82,729
<b>Securities at amortized cost</b>	<b>10,795</b>	<b>497,298</b>	<b>10,042</b>	<b>159,923</b>	<b>690,404</b>	<b>426,360</b>	<b>755,037</b>	<b>557,349</b>	<b>1,473,057</b>	<b>2,844,974</b>	<b>-</b>	<b>21,938</b>	<b>2,939,335</b>	<b>4,507,842</b>	<b>7,447,177</b>
fixed rate	751	497,298	-	155,801	690,404	426,360	755,037	557,349	1,472,558	2,844,974	-	-	2,918,750	4,481,782	7,400,532
variable rate	10,044	-	10,042	4,122	-	-	-	-	499	-	-	-	20,585	4,122	24,707
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	21,938	-	21,938	21,938
<b>Loans at amortized cost, net of allowance for loan losses</b>	<b>1,042,915</b>	<b>8,293,966</b>	<b>423,550</b>	<b>2,216,029</b>	<b>144,037</b>	<b>1,753,825</b>	<b>167,504</b>	<b>762,093</b>	<b>2,033,163</b>	<b>3,190,139</b>	<b>131,337</b>	<b>131,823</b>	<b>3,942,506</b>	<b>16,347,875</b>	<b>20,290,381</b>
fixed rate	44,776	2,012,784	58,830	267,791	73,472	918,694	134,008	745,751	1,529,058	3,133,887	-	-	1,840,144	7,078,907	8,919,051
variable rate	998,139	6,281,182	364,720	1,948,238	70,565	835,131	33,496	16,342	504,105	56,252	-	-	1,971,025	9,137,145	11,108,170
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	131,337	131,823	131,337	131,823	263,160
<b>Finance lease receivables</b>	<b>29,187</b>	<b>117,006</b>	<b>11,948</b>	<b>182,729</b>	<b>19,684</b>	<b>218,323</b>	<b>49,854</b>	<b>165,108</b>	<b>298,129</b>	<b>412,867</b>	<b>92</b>	<b>6,550</b>	<b>408,894</b>	<b>1,102,583</b>	<b>1,511,477</b>
fixed rate	8,234	3,853	2,553	22,739	19,478	77,985	49,334	82,644	282,166	258,657	-	-	361,765	445,878	807,643
variable rate	20,953	113,153	9,395	159,990	206	140,338	520	82,464	15,963	154,210	-	-	47,037	650,155	697,192
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	92	6,550	92	6,550	6,642
<b>Loans mandatorily at fair value through profit or loss</b>	<b>52,930</b>	<b>-</b>	<b>73,479</b>	<b>-</b>	<b>444,796</b>	<b>2,558</b>	<b>291,153</b>	<b>-</b>	<b>694,865</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,557,223</b>	<b>2,558</b>	<b>1,559,781</b>
fixed rate	-	-	-	-	-	2,558	-	-	-	-	-	-	-	2,558	2,558
variable rate	52,930	-	73,479	-	444,796	-	291,153	-	694,865	-	-	-	1,557,223	-	1,557,223
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Fair value adjustment of derivative financial instruments</b>	<b>1,135,228</b>	<b>1,050,184</b>	<b>1,082,978</b>	<b>1,051,630</b>	<b>1,000,250</b>	<b>614,282</b>	<b>188,848</b>	<b>36,176</b>	<b>326,300</b>	<b>317,311</b>	<b>837,606</b>	<b>327,441</b>	<b>4,571,210</b>	<b>3,397,024</b>	<b>7,968,234</b>
fixed rate	1,067,092	986,576	854,189	542,623	651,699	448,091	188,848	36,137	329,605	316,781	-	-	3,091,433	2,330,208	5,421,641
variable rate	68,136	63,608	228,789	509,007	348,551	166,191	-	39	(3,305)	530	-	-	642,171	739,375	1,381,546
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	837,606	327,441	837,606	327,441	1,165,047
<b>Other financial assets</b>	<b>617</b>	<b>38,521</b>	<b>805</b>	<b>17</b>	<b>216</b>	<b>1,790</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>186</b>	<b>99,212</b>	<b>150,956</b>	<b>100,850</b>	<b>191,470</b>	<b>292,320</b>
fixed rate	313	33,966	132	3	216	1,790	-	-	-	181	-	-	661	35,940	36,601
variable rate	304	4,555	673	14	-	-	-	-	-	5	-	-	977	4,574	5,551
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	99,212	150,956	99,212	150,956	250,168

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2024 [continued]

LIABILITIES	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest- bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Amounts due to banks, the National Governments, deposits from the National Banks and other banks</b>	<b>56,243</b>	<b>107,988</b>	<b>176,224</b>	<b>313,462</b>	<b>295,501</b>	<b>124,345</b>	<b>89,956</b>	<b>110,324</b>	<b>160,824</b>	<b>448,283</b>	<b>53,660</b>	<b>85,381</b>	<b>832,408</b>	<b>1,189,783</b>	<b>2,022,191</b>
fixed rate	15,565	23,373	98,839	68,997	281,384	61,808	89,956	100,447	160,824	418,827	-	-	646,568	673,452	1,320,020
variable rate	40,678	84,615	77,385	244,465	14,117	62,537	-	9,877	-	29,456	-	-	132,180	430,950	563,130
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	53,660	85,381	53,660	85,381	139,041
<b>Repo liabilities</b>	<b>23,736</b>	<b>108,401</b>	-	-	-	-	-	-	-	-	-	-	<b>23,736</b>	<b>108,401</b>	<b>132,137</b>
fixed rate	23,736	108,401	-	-	-	-	-	-	-	-	-	-	23,736	108,401	132,137
variable rate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Financial liabilities designated at fair value through profit or loss</b>	<b>17,008</b>	-	-	-	-	-	<b>16</b>	-	<b>1,456</b>	-	<b>54,010</b>	-	<b>72,490</b>	-	<b>72,490</b>
fixed rate	-	-	-	-	-	-	16	-	-	-	-	-	16	-	16
variable rate	17,008	-	-	-	-	-	-	-	1,456	-	-	-	18,464	-	18,464
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	54,010	-	54,010	-	54,010
<b>Deposits from customers<sup>1</sup></b>	<b>8,226,803</b>	<b>20,445,413</b>	<b>117,347</b>	<b>745,736</b>	<b>77,747</b>	<b>1,184,609</b>	<b>60,318</b>	<b>185,142</b>	<b>141,261</b>	<b>145,784</b>	<b>53,691</b>	<b>282,547</b>	<b>8,677,167</b>	<b>22,989,231</b>	<b>31,666,398</b>
fixed rate	1,080,245	9,229,742	117,347	744,055	77,652	1,182,192	60,318	181,916	141,261	143,141	-	-	1,476,823	11,481,046	12,957,869
variable rate	7,146,558	11,215,671	-	1,681	95	2,417	-	3,226	-	2,643	-	-	7,146,653	11,225,638	18,372,291
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	53,691	282,547	53,691	282,547	336,238
<b>Liabilities from issued securities</b>	<b>181,102</b>	<b>2,501</b>	<b>14,410</b>	-	<b>87,099</b>	<b>131,816</b>	<b>8,298</b>	<b>586,584</b>	<b>115,427</b>	<b>1,455,408</b>	-	<b>10,479</b>	<b>406,336</b>	<b>2,186,788</b>	<b>2,593,124</b>
fixed rate	2,262	2,501	14,410	-	87,099	117,537	8,298	586,584	115,427	1,455,408	-	-	227,496	2,162,030	2,389,526
variable rate	178,840	-	-	-	-	14,279	-	-	-	-	-	-	178,840	14,279	193,119
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	10,479	-	10,479	10,479

<sup>1</sup>Deposit from customers includes the fair value changes on hedged deposits involved in portfolio hedge of interest rate risk.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.4. Interest rate risk management [continued]**

As at 31 December 2024 [continued]

LIABILITIES [continued]	Within 1 month		Over 1 month and Within 3 months		Over 3 months and Within 12 months		Over 1 year and Within 2 years		Over 2 years		Non-interest- bearing		Total		Total
	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	HUF	Foreign currency	
<b>Fair value adjustment of derivative financial instruments</b>	<b>905,752</b>	<b>1,553,774</b>	<b>1,422,318</b>	<b>639,273</b>	<b>1,237,309</b>	<b>523,519</b>	<b>149,761</b>	<b>42,400</b>	<b>291,452</b>	<b>215,645</b>	<b>696,524</b>	<b>216,307</b>	<b>4,703,116</b>	<b>3,190,918</b>	<b>7,894,034</b>
fixed rate	781,932	1,508,386	878,673	490,085	769,354	332,117	149,585	42,394	291,452	215,645	-	-	2,870,996	2,588,627	5,459,623
variable rate	123,820	45,388	543,645	149,188	467,955	191,402	176	6	-	-	-	-	1,135,596	385,984	1,521,580
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	696,524	216,307	696,524	216,307	912,831
<b>Leasing liabilities</b>	<b>291</b>	<b>1,207</b>	<b>1,566</b>	<b>2,610</b>	<b>156</b>	<b>13,023</b>	<b>129</b>	<b>11,438</b>	<b>875</b>	<b>46,043</b>	<b>1,043</b>	<b>3,728</b>	<b>4,060</b>	<b>78,049</b>	<b>82,109</b>
fixed rate	182	707	2	1,583	9	7,390	3	5,331	389	15,527	-	-	585	30,538	31,123
variable rate	109	500	1,564	1,027	147	5,633	126	6,107	486	30,516	-	-	2,432	43,783	46,215
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	1,043	3,728	1,043	3,728	4,771
<b>Other financial liabilities</b>	<b>1,144</b>	<b>45,638</b>	<b>1</b>	<b>249</b>	<b>826</b>	<b>1,942</b>	<b>-</b>	<b>158</b>	<b>-</b>	<b>252</b>	<b>476,830</b>	<b>291,366</b>	<b>478,801</b>	<b>339,605</b>	<b>818,406</b>
fixed rate	451	45,580	1	83	826	1,801	-	138	-	248	-	-	1,278	47,850	49,128
variable rate	693	58	-	166	-	141	-	20	-	4	-	-	693	389	1,082
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	476,830	291,366	476,830	291,366	768,196
<b>Subordinated bonds and loans</b>	<b>-</b>	<b>42</b>	<b>-</b>	<b>94,656</b>	<b>-</b>	<b>9,646</b>	<b>-</b>	<b>2,874</b>	<b>-</b>	<b>262,135</b>	<b>-</b>	<b>6</b>	<b>-</b>	<b>369,359</b>	<b>369,359</b>
fixed rate	-	42	-	43	-	9,646	-	2,874	-	262,135	-	-	-	274,740	274,740
variable rate	-	-	-	94,613	-	-	-	-	-	-	-	-	-	94,613	94,613
non-interest-bearing	-	-	-	-	-	-	-	-	-	-	-	6	-	6	6
<b>Net position</b>	<b>(4,659,058)</b>	<b>(8,144,709)</b>	<b>(95,567)</b>	<b>1,967,354</b>	<b>697,825</b>	<b>1,265,536</b>	<b>1,144,570</b>	<b>806,352</b>	<b>4,349,480</b>	<b>4,841,841</b>	<b>70,006</b>	<b>1,774,682</b>	<b>1,507,256</b>	<b>2,511,056</b>	<b>4,018,312</b>

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.5. Market risk**

The Group takes on exposure to market risks. Market risks arise from open positions in interest rate, currency and equity products, all of which are exposed to general and specific market movements. The Group applies a 'Value-at-Risk' (VaR) methodology to estimate the market risk of positions held and the maximum losses expected, based upon a number of assumptions for various changes in market conditions. The Management Board sets limits on the value of risk that may be accepted, which is monitored on a daily basis. (Analysis of liquidity risk, foreign currency risk and interest rate risk is detailed in Notes 37.2., 37.3. and 37.4., respectively.)

**37.5.1. Market Risk sensitivity analysis**

The VaR risk measure estimates the potential loss in pre-tax profit over a given holding period for a specified confidence level.

The VaR methodology is a statistically defined, probability-based approach that takes into account market volatilities as well as risk diversification by recognizing offsetting positions and correlations between products and markets. Risks can be measured consistently across all markets and products, and risk measures can be aggregated to arrive at a single risk number. The one-day 99% VaR number used by the Group reflects the 99% probability that the daily loss will not exceed the reported VaR.

VaR methodologies are employed to calculate daily risk numbers include the historical and variance-covariance approach. The diversification effect has not been validated among the various market risk types when capital calculation happens.

In addition to these two methodologies, Monte Carlo simulations are applied to the various portfolios on a monthly basis to determine potential future exposure.

The VaR of the trading portfolio can be summarized as follows (in HUF mn):

<b>Historical VaR (99%, one-day) by risk type</b>	<b>Average VaR</b>	
	<b>31/12/2025</b>	<b>31/12/2024</b>
Foreign exchange	1,267	6,936
Interest rate	217	263
Equity instruments	20	11
Diversification	=	=
<b>Total VaR exposure</b>	<b><u>1,504</u></b>	<b><u>7,209</u></b>

The table above shows the VaR figures by asset classes. Since processes driving the value of the major asset classes are not independent (for example the depreciation of HUF against the EUR mostly coincide with the increase of the yields of Hungarian Government Bonds), a diversification impact emerges, so the overall VaR is less than the sum of the VaR of each individual asset class.

While VaR captures the Group's daily exposure to currency and interest rate risk, sensitivity analysis evaluates the impact of a reasonably possible change in interest or foreign currency rates over a year. The longer time frame of sensitivity analysis complements VaR and helps the Group to assess its market risk exposures. Details of sensitivity analysis for foreign currency risk are set out in Note 37.5.2., for interest rate risk in Note 37.5.3., and for equity price sensitivity analysis in Note 37.5.4.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.5. Market risk [continued]****37.5.2. Foreign currency sensitivity analysis**

The Bank changed its methodology of foreign currency sensitivity analysis and has been using a historical VaR calculation since 31 March 2021. The former Monte Carlo simulation represented the Group's sensitivity to the rise and fall in the HUF exchange rate against EUR, over a 3-month period. The sensitivity analysis included only outstanding foreign currency denominated monetary items as strategic open positions related to foreign activities. In line with the Management's intention, the former EUR (310) million strategic open position was fully closed as at 31 March 2021.

Since the closing of the strategic open position, the Group has been using a historical VaR calculation with a one-day holding period. The analysis includes the same net open foreign exchange position as used under the internal capital adequacy assessment process (ICAAP). The VaR methodology is a statistically defined, probability-based approach that takes into account market volatilities as well as risk diversification by recognizing offsetting positions and correlations between products and markets.

Additionally, the Bank determines the foreign currency risk of assets evaluated through the Other Comprehensive Income, which includes securities valued on fair value through other comprehensive income and the foreign currency translation reserves.

The following table shows the result of the foreign currency sensitivity analysis.

The numbers below indicate the expected daily profit or loss of the portfolio beside the given confidence level.

Probability	Effects to the Consolidated Statement of Profit or Loss		Effects to the Consolidated Statement of Other Comprehensive Income	
	In HUF million		In HUF million	
	31/12/2025	31/12/2024	31/12/2025	31/12/2024
1%	(663)	(4,017)	(5,457)	(6,716)
5%	(433)	(2,463)	(3,180)	(3,322)
25%	(147)	(988)	(1,182)	(1,155)
50%	29	(94)	33	(7)
25%	165	862	1,077	930
5%	404	2,202	2,633	2,634
1%	527	2,890	3,757	4,961

Note:

(1) Historical VaR simulation is based on the empirical distribution of the historical exchange rate movements between 31 December 2024 and 31 December 2025.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.5. Market risk [continued]****37.5.3. Interest rate sensitivity analysis**

The sensitivity analyses below have been determined based on the exposure to interest rates for both derivatives and non-derivative instruments at the balance sheet date. The analysis is prepared assuming the amount of assets and liabilities outstanding at the balance sheet date was outstanding for the whole year. The analysis was prepared by assuming only adverse interest rate changes. The main assumptions were as follows:

- Floating rate assets and liabilities were repriced to the modelled benchmark yields at the repricing dates assuming the unchanged margin compared to the last repricing.
- Fixed rate assets and liabilities were repriced at the contractual maturity date.
- As for liabilities with discretionary repricing feature by the Bank were assumed to be repriced with two-weeks delay, assuming no change in the margin compared to the last repricing date.
- Deposits with an interest rate lower than 0.3% even at high market rates were assumed to be unchanged for the whole period.

The sensitivity of interest income to changes in BUBOR was analysed by assuming two interest rate path scenarios:

- (1) BUBOR decreases gradually by 100 bps over the next year (probable scenario)
- (2) BUBOR increases gradually by 100 bps over the next year (alternative scenario)

The net interest income in a one-year period after 1 January 2026 would be decreased by HUF 4,246 million (probable scenario) and increased by HUF 4,227 million (alternative scenario) as a result of these simulation. A similar simulation indicated HUF 664 million decrease (probable scenario) and HUF 1,850 million (alternative scenario) increase in the Net interest income in a one-year period after 1 January 2025.

This effect is further enhanced by capital results HUF 1,898 million gain (for probable scenario) and HUF 1,852 loss million (for alternative scenario) as at 31 December 2025, the comparative results were (HUF 960 million gain for probable scenario, HUF 1,596 million loss for alternative scenario as at 31 December 2024) on the government bond portfolio held for hedging (economic).

Furthermore, the effects of an instant 10bps parallel shift of the HUF, EUR and USD yield-curves on net interest income over a one-year period and on the market value of the hedge government bond at fair value through other comprehensive income portfolio booked against capital was analysed. The results can be summarized as follows (in HUF million):

Description	31/12/2025		31/12/2024	
	Effects to the net interest income	Effects to capital	Effects to the net interest income	Effects to capital
HUF (0.1%) parallel shift	(1,136)	252	(491)	273
HUF 0.1% parallel shift	1,136	(252)	488	(273)
EUR (0.1%) parallel shift	(2,338)	-	(3,868)	-
EUR 0.1% parallel shift	4,294	-	4,175	-
USD (0.1%) parallel shift	(102)	-	(82)	-
USD 0.1% parallel shift	129	-	65	-

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.5. Market risk [continued]****37.5.4. Equity price sensitivity analysis**

The following table shows the effect of the equity price sensitivity. The Group uses VaR calculation with 1 day holding period and a 99% confidence level. The VaR methodology is a statistically defined, probability-based approach that takes into account market volatilities as well as risk diversification by recognizing offsetting positions and correlations between products and markets. The daily loss will not exceed the reported VaR number with 99% of probability.

The stress test assumes the largest price movement of the last year and calculates with it as the adverse direction. These scenarios show the loss of the portfolio when all prices change with the maximum amount of the last year.

<b>Description</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
VaR (99%, one day, HUF million)	11	9
Stress test (HUF million)	(23)	(52)

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.6. Capital management****Capital management**

The primary objective of the capital management of the Group is to ensure the prudent operation, the entire compliance with the prescriptions of the regulator for a persistent business operation and maximising the shareholder value, accompanied by an optimal financing structure.

The capital management of the Group members includes the management and evaluation of the shareholders' equity and other types of funds available for hedging risks, to be recorded in the equity and all material risks to be covered by the capital.

The basis of the capital management of the Group members in the short run is the continuous monitoring of their capital position, in the long run the strategic and the business planning, which includes the monitoring and forecast of the capital position.

The Group members maintain the capital adequacy required by the regulatory bodies and the planned risk taking mainly by means of ensuring and developing their profitability. In the event that the planned risk level of a Group member exceeded its Core and the previously raised Supplementary capital, it ensures the prudent operation by occasional measures. A further tool in the capital management of the Bank is the dividend policy, and the transactions performed with the treasury shares.

**Capital adequacy on the basis of CRR consolidation**

The Capital Requirements Directive package (CRDIV/CRR) transposes the new global standards on banking regulation (known as the Basel III agreement) into the EU legal framework. The new rules are applied from 1 January 2014. They set stronger prudential requirements for institutions, requiring them to keep sufficient capital reserves and liquidity. This new framework makes institutions in the EU more solid and strengthens their capacity to adequately manage the risks linked to their activities and absorb any losses they may incur in doing business. The capital adequacy of the Group is supervised based on the financial statements data prepared in accordance with IFRS applying the current directives, rulings and indicators from 1 January 2014.

For regulatory compliance the capital adequacy ratios according to regulatory scope of consolidation are relevant. The Disclosure requirement of OTP Group in line with Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises, and Regulation (EU) No 575/2013 contains the capital adequacy ratios calculated under regulatory scope of consolidation.

The Group has entirely complied with the regulatory capital requirements both in the year ended 31 December 2025 and 2024.

The Group uses the standard method for determining the regulatory capital requirements of the credit risk and market risk, and parallel to that, the base indicator method, and the advanced method ("AMA") in case of the operational risk.

The Capital adequacy ratio of the Group (CRR) was 19.7%, the Regulatory capital was HUF 5,725,501 million and the Total regulatory capital requirement was HUF 2,324,570 million as at 31 December 2025. The same ratios calculated as at 31 December 2024 were the following: 20.3%, HUF 5,200,375 million and HUF 2,046,142 million.

The group-level large exposure limit was exceeded against the Central Bank of Russia as at 31 March 2025. To address this, in July 2025 after the necessary discussions OTP Bank submitted an action plan to the Hungarian National Bank. The exposure remained within the limit at the end of each month during 2025, but ongoing compliance was challenging. Following the limit breach in January 2026, discussions were held with the NBH to submit a new compliance plan. OTP Group committed to 35% compliance till the end of 2026, which was approved by the NBH in February 2026.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.6. Capital management [continued]****Capital adequacy [continued]**

Calculation on CRR basis (in HUF million)	31/12/2025	31/12/2024
<b>Core capital (Tier 1) = Common Equity Tier 1 (CET 1)</b>	<b>5,253,291</b>	<b>4,842,978</b>
Issued capital	28,000	28,000
Reserves <sup>1</sup>	5,660,743	4,808,726
Fair value adjustments	(11,750)	(43,555)
Other capital components	75,624	287,847
Non-controlling interests	28,500	33,741
Treasury shares	(331,778)	(139,315)
Goodwill and other intangible assets	(198,637)	(220,998)
Other adjustments	2,589	88,532
<b>Supplementary capital (Tier 2)</b>	<b>472,210</b>	<b>357,397</b>
Subordinated bonds and loans	461,223	345,063
Components recognized in T2 capital issued by subsidiaries	10,987	12,334
<b>Regulatory capital</b>	<b>5,725,501</b>	<b>5,200,375</b>
Credit risk capital requirement	1,989,524	1,839,095
Market risk capital requirement	27,876	30,461
Operational risk capital requirement	307,170	176,586
<b>Total requirement regulatory capital</b>	<b>2,324,570</b>	<b>2,046,142</b>
<b>Surplus capital</b>	<b>3,400,931</b>	<b>3,154,233</b>
CET 1 ratio	18.10%	18.90%
Tier 1 ratio	18.10%	18.90%
<b>Capital adequacy ratio</b>	<b>19.70%</b>	<b>20.30%</b>

<sup>1</sup> The dividend amount planned to pay out / paid out is deducted from reserves.

**Basel III**

The components of the Common Equity Tier 1 capital (CET 1) are the following: Issued capital, Reserves (Retained earnings, Other reserves, Changes in the equity of subsidiaries, Net Profit for the year, Changes due to consolidation) Fair value adjustments, Other capital components, (Revaluation reserves, Share based payments, Cash-flow hedges, Net investment hedge in foreign operations), Non-controlling interest, Treasury shares, Goodwill and other Intangible assets, other adjustments (due to prudential filters, due to deferred tax receivables, due to temporary regulations).

Supplementary capital (Tier 2): Subordinated loan capital, Supplementary loan capital, Other issued capital components, Components recognized in T2 capital issued by subsidiaries.

**NOTE 37: FINANCIAL RISK MANAGEMENT (in HUF mn) [continued]****37.6. Capital management [continued]****Resolution strategy of OTP Group**

The National Bank of Hungary as the group-level resolution authority of OTP Group draw up the group resolution plan for OTP in close cooperation with the national resolution authorities of the EU and the equivalent third country subsidiaries in line with Section 7 of the Resolution Act (XXXVII of 2014 on the further development of the system of institutions strengthening the security of the individual players of the financial intermediary system) implementing Article 12 of BRRD (2014/59/EU Directive). According to the plan the resolution strategy for OTP Group is the Multiple Point of Entry Approach (MPE) which determines two intervention points in the Group in case of resolution: OTP Bank (Hungary) and OTP banka d.d. (Slovenia).

OTP Bank's Resolution Group covers entities included in the prudential scope of consolidation of OTP Bank without OTP banka d.d. (Slovenia) and its subsidiaries, while OTP banka d.d.'s Resolution Group covers OTP banka d.d. and its subsidiaries which is equivalent to the prudential scope of consolidation. For both resolution groups the preferred resolution tool is the application of open-bank bail-in at the level of each of the resolution entities – OTP Bank Plc. and OTP banka d.d. (Slovenia).

The resolution authorities monitor the degree of integration of OTP banka d.d. (Slovenia) into OTP Group as a result of the integration project based on which the MPE resolution strategy is planned to be reviewed in the next update of the group-level resolution plan.

**MREL requirement of OTP Group**

Pursuant to Section 62 (1) of the Resolution Act OTP Bank shall meet the minimum requirement for own funds and eligible liabilities (MREL) on a consolidated basis at the level of the resolution group. The MNB establishes and updates annually the MREL requirement on the basis of the Joint Decision of the Resolution College, which is operated jointly with the resolution authorities of OTP Bank's subsidiaries.

The consolidated MREL requirement of OTP Bank applicable from January 2025 is 18.6% of the total risk exposure amount/risk weighted assets (TREA/RWA) and 6.02% of the total exposure measure (TEM) of OTP Bank's Resolution Group. The reviewed consolidated MREL requirement is expected to apply from May 2026. Subordination requirements are applicable to OTP Bank from 16 December 2024 that are set at 13.5% of TREA/RWA, 5% of TEM and 8% of TLOF (total liabilities and own funds) of OTP Bank's Resolution Group which shall be met with own funds and subordinated eligible instruments. OTP Bank shall meet the combined buffer requirement in addition to the consolidated MREL RWA requirement / MREL RWA subordination requirement.

**NOTE 38: TRANSFER OF FINANCIAL INSTRUMENTS (in HUF mn)****Financial assets transferred but not derecognized**

	<b>Transferred assets Carrying amount 31/12/2025</b>	<b>Associated liabilities Carrying amount 31/12/2025</b>	<b>Transferred assets Carrying amount 31/12/2024</b>	<b>Associated liabilities Carrying amount 31/12/2024</b>
<b>Financial assets at fair value through profit or loss</b>				
Debt securities	<u>1,761</u>	<u>1,766</u>	=	=
<b>Total</b>	<b><u>1,761</u></b>	<b><u>1,766</u></b>	=	=
<b>Financial assets at fair value through other comprehensive income</b>				
Debt securities	<u>28,134</u>	<u>9,971</u>	=	=
<b>Total</b>	<b><u>28,134</u></b>	<b><u>9,971</u></b>	=	=
<b>Financial assets at amortized cost</b>				
Debt securities	391,759	155,072	205,726	132,137
Loans and advances	<u>3,782</u>	=	=	=
<b>Total</b>	<b><u>395,541</u></b>	<b><u>155,072</u></b>	<b><u>205,726</u></b>	<b><u>132,137</u></b>
<b>Total</b>	<b><u>425,436</u></b>	<b><u>166,809</u></b>	<b><u>205,726</u></b>	<b><u>132,137</u></b>

As at 31 December 2025 and 2024, respectively, the Group had an obligation from repurchase agreements (repo liability) of HUF 166,809 million and HUF 132,137 million respectively. Securities sold temporarily under repurchase agreements will continue to be recognized in the Consolidated Statement of Financial Position of the Group in the appropriate securities category. The related liability is measured at amortized cost in the Consolidated Statement of Financial Position as “Repo liabilities”.

**Financial assets transferred, derecognized with continuing involvement**

Financial assets which would have been derecognized but would be represented the continuing involvement are not recognized in the Consolidated Statement of Financial Position as at 31 December 2025 or as at 31 December 2024.

**NOTE 39: OFF-BALANCE SHEET ITEMS AND DERIVATIVE FINANCIAL INSTRUMENTS (in HUF mn)**

In the normal course of business, the Group becomes a party to various financial transactions that are not reflected on the Consolidated statement of financial position and are referred to as off-balance sheet financial instruments. The following represent notional amounts of these off-balance sheet financial instruments, unless stated otherwise.

<b>Contingent liabilities</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Commitments to extend credit	6,457,450	5,693,803
Guarantees arising from banking activities	1,607,668	1,547,379
Factoring loan commitment	445,162	467,939
Confirmed letters of credit	55,500	41,120
Other	<u>620,312</u>	<u>530,422</u>
<b>Contingent liabilities and commitments total in accordance with IFRS 9</b>	<b><u>9,186,092</u></b>	<b><u>8,280,663</u></b>
Legal disputes (disputed value)	144,517	115,918
Underwriting guarantees	9,376	8,768
Other	<u>78,436</u>	<u>56,677</u>
<b>Contingent liabilities and commitments total in accordance with IAS 37</b>	<b><u>232,329</u></b>	<b><u>181,363</u></b>
<b>Total</b>	<b><u>9,418,421</u></b>	<b><u>8,462,026</u></b>

**Legal disputes**

At the balance sheet date, the Group was involved in various claims and legal proceedings of a nature considered normal to its business. The amount of these claims and legal proceedings corresponds to the amount of claims and legal proceedings in previous years.

The Group believes that the various asserted claims and litigations in which it is involved will not materially affect its financial position, future operating results or cash flows, although no assurance can be given with respect to the ultimate outcome of any such claim or litigation. Provisions due to legal disputes were HUF 36,774 million as at 31 December 2025 and HUF 39,867 million as at 31 December 2024, respectively. (See Note 24.)

**Commitments to extend credit, guarantees and letters of credit**

The primary purpose of these instruments is to ensure that funds are available to a customer as required. Guarantees and standby letters of credit, which represent irrevocable assurances that the Group will make payments in the event that a customer cannot meet its obligations to third parties, carry the same credit risk as loans.

Documentary and commercial letters of credit, which are written undertakings by the Group on behalf of a customer authorising a third party to draw drafts on the Group up to a stipulated amount under specific terms and conditions, are collateralised by the underlying shipments of goods to which they relate and therefore carry less risk than a direct borrowing.

Commitments to extend credit represent unused portions of authorisations to extend credit in the form of loans, guarantees or letters of credit. With respect to credit risk on commitments to extend credit, the Group is potentially exposed to loss in an amount equal to the total unused commitments. However, the likely amount of loss is less than the total unused commitments since most commitments to extend credit are contingent upon customers maintaining specific credit standards.

Guarantees, irrevocable letters of credit and undrawn loan commitments are subject to similar credit risk monitoring and credit policies as utilised in the extension of loans. The Management of the Group believes the market risk associated with guarantees, irrevocable letters of credit and undrawn loan commitments are minimal.

**NOTE 39: OFF-BALANCE SHEET ITEMS AND DERIVATIVE FINANCIAL INSTRUMENTS (in HUF mn) [continued]****Guarantees, payment undertakings arising from banking activities**

Payment undertaking is a promise by the Group to assume responsibility for the debt obligation of a borrower if that borrower defaults until a determined amount, until a determined date, in case of fulfilling conditions, without checking the underlying transactions. The guarantee's liability is joint and primary with the principal, in case of payment undertaking, while the Group assumes the obligation derived from guarantee independently by the conditions established by the Group. A guarantee is most typically required when the ability of the primary obligor to perform its obligations under a contract is in question, or when there is some public or private interest which requires protection from the consequences of the principal's default or delinquency.

A contract of guarantee is subject to the statute of frauds (or its equivalent local laws) which has maturity and is only enforceable if recorded in writing and signed by the surety and the principal. This means that if the beneficiary has not exercised his rights against the surety or guarantor by the deadline indicated, he automatically forfeits all his claims against the guarantor or surety.

In the case of a simple surety, the beneficiary is obliged to seek recovery of the debt from the debtor, because as long as the debt is recoverable from the debtor, the guarantor can refuse to pay, whereas in the case of a cash surety, the beneficiary can also go to the guarantor immediately, there being no objection to enforcement.

**Derivatives**

The Group maintains strict control limits on net open derivative positions, that is the difference between purchase and sale contracts, regarding both the amount and the term. At any time the amount subject to credit risk is limited to the current fair value of instruments that are favourable to the Group (i.e. assets), which in relation to derivatives is only a small fraction of the contract or notional values used to express the volume of instruments outstanding. This credit risk exposure is managed as part of the overall lending limits with customers, together with potential exposures from market movements. Collateral or other security is not usually obtained for credit risk exposures on these instruments, except for trading with clients, where the Group in most of the cases requires margin deposits.

**NOTE 40: SHARE-BASED PAYMENTS AND EMPLOYEE BENEFITS (in HUF mn)**

The previously approved option program required a modification due to the introduction of the Bank Group Policy on Payments accepted in resolution of Annual General Meeting regarding to the amendment of CRD III. Directives and Act on Credit Institutions and Financial Enterprises.

Key management personnel affected by the Bank Group Policy receive compensation based on performance assessment generally in the form of cash bonus and equity shares in a ratio of 50-50%. Assignment is based on OTP shares, furthermore performance-based payments are deferred in accordance with the rules of Credit Institutions Act.

The Bank ensures the share-based payment part for the management personnel of the Group members.

During implementation of the Remuneration Policy of the Group appeared that in case of certain foreign subsidiaries it is not possible to ensure the originally determined share-based payment because of legal reasons – incompatible with relevant EU-directives –, therefore a decision was made to cancel the share-based payment in affected countries, and virtual share-based payment – cash payment fixed to share price - was made from 2017. In case of foreign subsidiaries virtual share-based payment was made uniformly from 2021 (in the case of payments related to 2021).

The quantity of usable shares for individuals calculated for settlement of share-based payment shall be determined as the ratio of the amount of share-based payment and share price determined by Supervisory Board (until the end of 2014 by Board of Directors).

The value of the share-based payment at the performance assessment is determined within 10 days by Supervisory Board based on the average of the three previous trade day's middle rate of OTP Bank's equity shares fixed on the Budapest Stock Exchange.

At the same time the conditions of discounted share-based payment are determined, and share-based payment shall contain maximum HUF 6,000 discount at the assessment date, and earnings for the shares at the payment date is maximum HUF 12,000. Employee benefits are all forms of consideration given by an entity in exchange for service rendered by employees or for the termination of employment. IAS 19 Employee Benefits shall be applied in accounting for all employee benefits, except those to which IFRS 2 Share-based Payment applies.

The parameters for the share-based payment relating to ongoing years 2019-2021 by the Supervisory Board for periods of each year as follows:

Year	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share
	Exercise price	Maximum earnings		Exercise price	Maximum earnings		Exercise price	Maximum earnings	
	<b>for the year 2019</b>			<b>HUF per share for the year 2020</b>			<b>for the year 2021</b>		
2020	9,553	4,000	11,553	-	-	-	-	-	-
2021	9,553	4,000	11,553	12,644	9,000	16,644	-	-	-
2022	9,553	4,000	11,553	12,644	8,000	16,644	5,912	6,000	8,912
2023	9,553	4,000	11,553	13,644	8,000	16,644	6,912	7,000	8,912
2024	9,553	4,000	11,553	13,644	8,000	16,644	6,912	8,000	8,912
2025	9,553	4,000	11,553	13,644	8,000	16,644	6,912	9,000	8,912
2026	9,553	4,000	11,553	13,644	8,000	16,644	6,912	10,000	8,912
2027	-	-	-	13,644	8,000	16,644	6,912	10,000	8,912
2028	-	-	-	-	-	-	6,912	10,000	8,912

**NOTE 40: SHARE-BASED PAYMENTS AND EMPLOYEE BENEFITS (in HUF mn) [continued]**

The parameters for the share-based payment relating to ongoing years 2022-2024 by the Supervisory Board for periods of each year as follows:

Year	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share	Share purchasing at a discounted price		Price of remuneration exchanged to share
	Exercise price	Maximum earnings		Exercise price	Maximum earnings		Exercise price	Maximum earnings	
	for the year 2022			HUF per share for the year 2023			for the year 2024		
2023	7,773	6,000	10,773	-	-	-	-	-	-
2024	8,773	7,000	10,773	14,486	12,000	17,486	-	-	-
2025	8,773	8,000	10,773	15,486	12,000	17,486	24,051	12,000	27,051
2026	8,773	9,000	10,773	16,486	12,000	17,486	25,051	12,000	27,051
2027	8,773	10,000	10,773	16,486	12,000	17,486	26,051	12,000	27,051
2028	8,773	10,000	10,773	16,486	12,000	17,486	26,051	12,000	27,051
2029	8,773	10,000	10,773	16,486	12,000	17,486	26,051	12,000	27,051
2030	-	-	-	16,486	12,000	17,486	26,051	12,000	27,051
2031	-	-	-	-	-	-	26,051	12,000	27,051

Parameters of benefits for year after 2024 due in 2031 only is applicable to foreign companies and for virtual benefits.

Relevant factors considered during measurement of fair value related to share-based payment as follows:

Year	Reference price	Assumed volatility	Risk-free interest rate (HUF)						
			1-year	2-year	3-year	4-year	5-year	6-year	7-year
2017	9,200	21.30%	0.10%	0.50%	0.70%	1.00%	1.30%	1.30%	1.30%
2018	10,064	26.00%	0.20%	0.60%	1.00%	1.30%	1.60%	1.90%	2.10%
2019	12,413	19.20%	0.20%	0.70%	0.90%	1.10%	1.30%	1.40%	1.60%
2020	11,553	33.60%	0.60%	0.40%	0.50%	0.60%	0.80%	0.90%	1.00%
2021	16,644	28.60%	1.00%	1.60%	1.80%	1.90%	2.00%	2.10%	2.10%
2022	8,912	42.60%	7.10%	7.90%	7.60%	7.30%	7.10%	7.00%	6.90%
2023	10,773	33.30%	13.20%	9.20%	8.20%	7.70%	7.30%	7.10%	6.90%
2024	17,485	22.10%	6.20%	5.80%	5.80%	5.90%	5.90%	6.00%	6.00%
2025	27,051	23.60%	6.00%	5.40%	5.40%	5.50%	5.60%	5.70%	5.80%

Year	Expected dividends (HUF/Share)							Pricing model
	1-year	2-year	3-year	4-year	5-year	6-year	7-year	
2017	219	219	252	290	334	384	442	Binomial
2018	219	219	219	219	219	219	219	Binomial
2019	252	290	333	383	440	507	583	Binomial
2020	219	252	290	333	383	440	507	Binomial
2021	371	321	357	393	432	475	523	Binomial
2022	452	497	547	601	661	728	800	Binomial
2023	300	330	363	399	439	483	531	Binomial
2024	714	786	864	951	1,046	1,150	1,265	Binomial
2025	1,179	1,296	1,426	1,568	1,725	1,897	2,087	Binomial

**NOTE 40: SHARE-BASED PAYMENTS AND EMPLOYEE BENEFITS (in HUF mn) [continued]**

Based on parameters accepted by Supervisory Board relating to the year 2019 effective pieces are as follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable as at 31 December 2025
Share purchasing period started in 2020	91,403	91,403	12,218	-	-
Remuneration exchanged to share provided in 2020	22,806	22,806	11,897	-	-
Share purchasing period started in 2021	201,273	201,273	16,298	-	-
Remuneration exchanged to share provided in 2021	30,834	30,834	17,618	-	-
Share purchasing period started in 2022	107,760	101,897	13,771	5,863	-
Remuneration exchanged to share provided in 2022	10,564	10,564	8,529	-	-
Share purchasing period started in 2023	126,749	123,676	14,336	3,073	-
Remuneration exchanged to share provided in 2023	13,427	13,427	11,674	-	-
Share purchasing period started in 2024	31,262	31,262	17,618	-	-
Remuneration exchanged to share provided in 2024	6,183	6,183	17,540	-	-
Remuneration exchanged to share provided in 2025	1,000	1,000	27,928	-	-
Remuneration exchanged to share applying in 2026	-	-	-	-	500

Based on parameters accepted by Supervisory Board relating to the year 2020 effective pieces are as follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable as at 31 December 2025
Share purchasing period started in 2021	41,098	14,142	17,997	26,956	-
Remuneration exchanged to share provided in 2021	17,881	17,881	17,498	-	-
Share purchasing period started in 2022	83,688	76,928	17,629	6,760	-
Remuneration exchanged to share provided in 2022	15,232	15,111	8,529	121	-
Share purchasing period started in 2023	47,275	45,755	19,805	1,520	-
Remuneration exchanged to share provided in 2023	8,562	8,562	11,659	-	-
Share purchasing period started in 2024	49,974	49,974	19,993	-	-
Remuneration exchanged to share provided in 2024	11,837	11,837	17,613	-	-
Remuneration exchanged to share started in 2025	12,371	12,371	18,823	-	-
Remuneration exchanged to share provided in 2025	3,691	3,691	27,652	-	-
Remuneration exchanged to share applying in 2026	-	-	-	-	680
Remuneration exchanged to share applying in 2027	-	-	-	-	680

**NOTE 40: SHARE-BASED PAYMENTS AND EMPLOYEE BENEFITS (in HUF mn) [continued]**

Based on parameters accepted by Supervisory Board relating to the year 2021 effective pieces are as follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable as at 31 December 2025
Share purchasing period started in 2022	60,018	59,776	10,122	242	-
Remuneration exchanged to share provided in 2022	11,028	11,028	8,691	-	-
Share purchasing period started in 2023	117,276	117,276	13,672	-	-
Remuneration exchanged to share provided in 2023	10,824	10,824	11,534	-	-
Share purchasing period started in 2024	50,402	50,083	17,838	319	-
Remuneration exchanged to share provided in 2024	4,807	4,807	17,399	-	-
Share purchasing period started in 2025	53,930	52,899	17,825	-	1,031
Remuneration exchanged to share provided in 2025	4,942	4,807	27,499	135	-
Remuneration exchanged to share starting in 2026	-	-	-	-	58,155
Remuneration exchanged to share applying in 2026	-	-	-	-	4,942
Remuneration exchanged to share starting in 2027	-	-	-	-	25,305
Remuneration exchanged to share applying in 2027	-	-	-	-	631

Based on parameters accepted by Supervisory Board relating to the year 2022 effective pieces are as follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable as at 31 December 2025
Share purchasing period started in 2023	57,412	57,364	13,484	48	-
Remuneration exchanged to share provided in 2023	8,726	8,590	11,629	136	-
Share purchasing period started in 2024	103,159	102,651	17,684	508	-
Remuneration exchanged to share provided in 2024	3,769	3,769	17,399	-	-
Share purchasing period started in 2025	42,463	41,650	18,164	-	813
Remuneration exchanged to share provided in 2025	3,769	3,769	26,914	-	-
Share purchasing period starting in 2026	-	-	-	-	43,714
Remuneration exchanged to share applying in 2026	-	-	-	-	3,993
Share purchasing period starting in 2027	-	-	-	-	44,701
Remuneration exchanged to share applying in 2027	-	-	-	-	3,993
Share purchasing period starting in 2028	-	-	-	-	19,756

**NOTE 40: SHARE-BASED PAYMENTS AND EMPLOYEE BENEFITS (in HUF mn) [continued]**

Based on parameters accepted by Supervisory Board relating to the year **2023** effective pieces are as follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable as at 31 December 2025
Share purchasing period started in 2024	97,690	96,566	20,731	1,124	-
Remuneration exchanged to share provided in 2024	6,745	6,745	17,402	-	-
Share purchasing period started in 2025	188,376	162,349	19,525	-	26,027
Remuneration exchanged to share provided in 2025	6,527	6,527	27,194	-	-
Share purchasing period starting in 2026	-	-	-	-	71,160
Remuneration exchanged to share applying in 2026	-	-	-	-	2,960
Share purchasing period starting in 2027	-	-	-	-	81,415
Remuneration exchanged to share applying in 2027	-	-	-	-	2,960
Share purchasing period starting in 2028	-	-	-	-	87,315
Remuneration exchanged to share applying in 2028	-	-	-	-	2,960
Share purchasing period starting in 2029	-	-	-	-	39,324

Based on parameters accepted by Supervisory Board relating to the year **2024** effective pieces are as follows as at 31 December 2025:

	Approved pieces of shares	Exercised until 31 December 2025	Weighted average share price at the date of exercise (in HUF)	Expired pieces	Exercisable as at 31 December 2025
Share purchasing period started in 2025	73,713	73,713	26,808	-	-
Remuneration exchanged to share provided in 2025	5,967	5,967	26,898	-	-
Share purchasing period starting in 2026	-	-	-	-	111,392
Remuneration exchanged to share applying in 2026	-	-	-	-	8,322
Share purchasing period starting in 2027	-	-	-	-	52,041
Remuneration exchanged to share applying in 2027	-	-	-	-	3,421
Share purchasing period starting in 2028	-	-	-	-	55,440
Remuneration exchanged to share applying in 2028	-	-	-	-	3,421
Share purchasing period starting in 2029	-	-	-	-	59,682
Remuneration exchanged to share applying in 2029	-	-	-	-	3,421
Share purchasing period starting in 2030	-	-	-	-	18,067
Remuneration exchanged to share applying in 2030	-	-	-	-	1,749

**NOTE 40: SHARE-BASED PAYMENTS AND EMPLOYEE BENEFITS (in HUF mn) [continued]**

Effective pieces relating to the periods starting in 2026-2030 settled during valuation of performance of year 2021-2024, can be modified based on risk assessment and personal changes.

In connection with the share-based compensation for Board of Directors and connecting compensation, shares given as a part of payments detailed above and for the year 2025 based on performance assessment accounted as equity-settled share-based transactions, HUF 5,391 million and HUF 4,411 million was recognized as expense for the year ended 31 December 2025 and 2024, respectively.

**Defined benefit plan**

Defined benefit plan is post-employment benefit plans other than defined contribution plan. The Group's net obligation is calculated by estimating the amount of employee's future benefit based on their services for the current and prior periods. The future value of benefit is being discounted to present value.

The Group has small number of plans and mainly in Bulgaria, Serbia, Montenegro, Croatia and Slovenia. These plans are providing retirement benefits upon pension age as lump-sum payment based either on fixed amounts or certain months of salary.

These plans are unfunded consequently there are no significant plan assets associated with these plans.

The movements of defined benefit obligation can be summarized as follows:

	31/12/2025	31/12/2024
<b>Balance as at 1 January</b>	<b>7,940</b>	<b>6,584</b>
Current service cost	525	498
Interest cost	303	343
Actuarial losses from changes in demographic assumptions	1	5
Actuarial losses from changes in financial assumptions	226	471
Benefits paid	(559)	(619)
Past service cost	1	15
Other increase	62	180
Revaluation difference	<u>(464)</u>	<u>463</u>
<b>Closing balance</b>	<b><u>8,035</u></b>	<b><u>7,940</u></b>

<b>Amounts recognized in profit and loss</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Current service cost	525	498
Net interest expense	303	343
Past service cost	1	15
Actuarial loss	288	326
Other income	<u>(74)</u>	<u>(487)</u>
<b>Total</b>	<b><u>1,043</u></b>	<b><u>695</u></b>

<b>Maturity analysis of the present value of defined benefit obligations</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Within one year	701	127
Within 5 years and over one year	1,712	1,237
Within 10 years and over 5 years	2,968	2,210
Over 10 years	<u>2,654</u>	<u>1,688</u>
<b>Total present value</b>	<b><u>8,035</u></b>	<b><u>5,262</u></b>

**NOTE 40: SHARE-BASED PAYMENTS AND EMPLOYEE BENEFITS (in HUF mn) [continued]****Defined benefit plan [continued]**

<b>Actuarial assumptions</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Discount rate	3.00% - 6.00%	2.75% - 8.00%
Future salary increases	0.00% - 10.30%	1.48% - 8.65%
Inflation rate	3.80% - 4.60%	2.20% - 12.00%
<b>Sensitivity analysis</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
If the discount rate is 100 basis points higher, the defined benefit obligation would decrease by	(650)	(582)
If the discount rate is 100 basis points lower, the defined benefit obligation would increase by	757	673
If the expected salary growth increases by 1 per cent, the defined benefit obligation would increase by	721	642
If the expected salary growth decreases by 1 per cent, the defined benefit obligation would decrease by	(631)	(565)

Since plan asset is not recognized in the Consolidated Financial Statements, the effect of the asset ceiling, the effect of changes in foreign exchange rates and the return on plan assets, excluding amounts included in interest accounts are also not recognized and therefore not presented.

OTP Group made an insignificant amount of contribution to the defined benefit plans during the year ended 31 December 2025 and 2024, respectively.

**NOTE 41: RELATED PARTY TRANSACTIONS (in HUF mn)**

The compensation of key management personnel, such as the members of the Board of Directors, members of the Supervisory Board, key employees of the Bank and its major subsidiaries involved in the decision-making process in accordance with the compensation categories defined in IAS 24 Related Party Disclosures, is summarised below:

<b>Compensations</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Short-term employee benefits	15,261	12,688
Share-based payment	5,257	4,350
Other long-term employee benefits	953	1,042
Termination benefits	<u>7</u>	<u>178</u>
<b>Total</b>	<b><u>21,478</u></b>	<b><u>18,258</u></b>

Share based compensations to the members of the Board of Directors, Supervisory Board or key employees of the Bank and its major subsidiaries are detailed in Note 40 Share-based payments.

An analysis of payment to executives of the Group related to their activity in Board of Directors and Supervisory Board is as follows:

	<b>31/12/2025</b>	<b>31/12/2024</b>
Members of Board of Directors	6,179	4,773
Members of Supervisory Board	<u>639</u>	<u>551</u>
<b>Total</b>	<b><u>6,818</u></b>	<b><u>5,324</u></b>

**NOTE 41: RELATED PARTY TRANSACTIONS (in HUF mn) [continued]**

Connections with related party (key management personnel and their close family member and companies) by which line of the consolidated statement of financial position and off-balance sheet is presented:

Assets	31/12/2025			Total	31/12/2024			Total
	Other related parties	Associated companies	Other companies		Other related parties	Associated companies	Other companies	
Securities (net value)	621	19	-	<b>640</b>	614	18	-	<b>632</b>
Fair value adjustment of derivative financial instruments	-	-	-	-	-	253	-	<b>253</b>
Loans at amortized cost (net value)	92,754	1,498	2,026	<b>96,278</b>	67,671	22,689	2,111	<b>92,471</b>
Finance lease receivable (net value)	-	4	26	<b>30</b>	-	23	-	<b>23</b>
Loans mandatorily at fair value through profit or loss	<u>157</u>	<u>851</u>	<u>824</u>	<b><u>1,832</u></b>	<u>182</u>	<u>408</u>	<u>2,150</u>	<b><u>2,740</u></b>
<b>Total assets</b>	<b><u>93,532</u></b>	<b><u>2,372</u></b>	<b><u>2,876</u></b>	<b><u>98,780</u></b>	<b><u>68,467</u></b>	<b><u>23,391</u></b>	<b><u>4,261</u></b>	<b><u>96,119</u></b>
<b>Liabilities</b>								
Deposits from customers and loan liabilities	<u>70,974</u>	<u>14,884</u>	<u>1,182</u>	<b><u>87,040</u></b>	<u>33,445</u>	<u>12,626</u>	<u>8,128</u>	<b><u>54,199</u></b>
<b>Total liabilities</b>	<b><u>70,974</u></b>	<b><u>14,884</u></b>	<b><u>1,182</u></b>	<b><u>87,040</u></b>	<b><u>33,445</u></b>	<b><u>12,626</u></b>	<b><u>8,128</u></b>	<b><u>54,199</u></b>

**NOTE 41: RELATED PARTY TRANSACTIONS (in HUF mn) [continued]**

Connections with related party (key management personnel and their close family member and companies) by which line of the consolidated statement of financial position and off-balance sheet is presented [continued]:

Off-balance sheet items	31/12/2025			Total	31/12/2024			Total
	Other related parties	Associated companies	Other companies		Other related parties	Associated companies	Other companies	
Undrawn line of credit	114,278	495	1,760	<b>116,533</b>	54,572	50	1,850	<b>56,472</b>
Bank Guarantee	13,300	-	509	<b>13,809</b>	7,472	2,050	1,228	<b>10,750</b>
Commitments and guarantees given	<u>50</u>	-	-	<b>50</b>	<u>34</u>	-	-	<b>34</b>
<b>Total off-balance sheet items</b>	<b><u>127,628</u></b>	<b><u>495</u></b>	<b><u>2,269</u></b>	<b><u>130,392</u></b>	<b><u>62,078</u></b>	<b><u>2,100</u></b>	<b><u>3,078</u></b>	<b><u>67,256</u></b>

Statement of profit or loss (turnover during the current period)	31/12/2025	31/12/2024
Interest income	1,681	2,654
Fee and commission income	671	352
Interest expense	(440)	(781)
Fee and commission expenses	(2,312)	(1,510)
Loss allowance / Provision on loans, placements, for commitments and guarantees given	(30)	(270)
Operational costs	(7,284)	(4,989)
Net income from sale of assets	194	-

In the normal course of business, the Bank enters into other transactions with its unconsolidated subsidiaries of the Group, the amounts and volumes of which are not significant to these Consolidated Financial Statements taken as a whole. Related party transactions were made on terms equivalent to those that prevail in arm's length transactions and such terms can be substantiated.

**NOTE 42: SIGNIFICANT SUBSIDIARIES AND ASSOCIATES (in HUF mn)**

Investments in companies in which the Bank has a controlling interest are detailed below. They are fully consolidated companies and incorporated in Hungary unless otherwise stated.

**Significant subsidiaries**

Name	Ownership (Direct and Indirect)		Activity
	31/12/2025	31/12/2024	
DSK Bank AD (Bulgaria)	99.92%	99.92%	commercial banking services
OTP Bank JSC (Ukraine)	100.00%	100.00%	commercial banking services
JSC "OTP Bank" (Russia)	97.92%	97.92%	commercial banking services
OTP banka d.d. (Croatia)	100.00%	100.00%	commercial banking services
OTP banka Srbija a.d. Novi Sad (Serbia)	100.00%	100.00%	commercial banking services
Crnogorska komercijalna banka a.d. (Montenegro)	100.00%	100.00%	commercial banking services
Banka OTP Albania SHA (Albania)	100.00%	100.00%	commercial banking services
OTP Bank S.A. (Moldova)	98.26%	98.26%	commercial banking services
OTP banka d.d. (Slovenia)	100.00%	100.00%	commercial banking services
JSCMB 'Ipoteka Bank' (Uzbekistan)	79.83%	79.82%	commercial banking services
OTP Financing Malta Company Ltd. (Malta)	100.00%	100.00%	refinancing activities
OTP Holding Ltd. (Cyprus)	100.00%	100.00%	refinancing activities
OTP Factoring Ltd.	100.00%	100.00%	work-out
OTP Mortgage Bank Ltd.	100.00%	100.00%	mortgage lending
OTP Real Estate Ltd.	100.00%	100.00%	real estate management and development
Merkantil Bank Ltd.	100.00%	100.00%	finance lease
OTP Building Society Ltd.	100.00%	100.00%	housing savings and loan
OTP Fund Management Ltd.	100.00%	100.00%	fund management
Bank Center No. 1. Ltd.	100.00%	100.00%	real estate lease
OTP Funds Servicing and Consulting Ltd.	100.00%	100.00%	fund services
OTP Real Estate Leasing Ltd.	100.00%	100.00%	real estate leasing

**NOTE 42: SIGNIFICANT SUBSIDIARIES AND ASSOCIATES (in HUF mn) [continued]****Significant associates and joint ventures**

The associated entities that are owned through venture capital funds are not detailed below neither for year 2025 nor for 2024, only the funds that own them are presented below. PortfoLion funds are subsidiaries in the consolidated financial statements.

Summarized financial and non-financial information of associates which are accounted according to IAS 28 and in line with IFRS 9 as at 31 December 2025 is as follows:

List of associated entities (amounts in HUF million)	Carrying amount	Shareholder's equity	Share capital	Profit after tax	Voting right	Country / Headquarter	Activity
PortfoLion Digital Venture Capital Fund I.	22,197	18,662	7,000	(2,472)	100.00%	Hungary /Budapest	Digital technology, solutions that strengthen the bank's innovation capacity (e.g. big data, financial software, payment solutions, blockchain etc.).
PortfoLion Regional Venture Capital Fund II.	17,200	20,671	20,566	2,439	49.88%	Hungary /Budapest	Investment in any industries and sectors, due to which international expansion of Hungarian enterprises can be realized.
PortfoLion Partner Venture Capital Fund	23,413	90,699	72,004	(5,145)	30.56%	Hungary /Budapest	Financing of domestic or foreign takeover, capital increase or merger in which the acquiring company is at least majority-owned by Hungarians.
PortfoLion Digital Venture Capital Fund II.	7,507	7,579	8,440	(395)	100.00%	Hungary /Budapest	IT, digital technology, fintech
PortfoLion Green Venture Capital Fund	14	39,310	37,500	83	100.00%	Hungary /Budapest	Investing in companies engaged in agricultural activities, as well as in food processing and agriculture-related areas.
PortfoLion Agricultural Venture Capital Fund II	-	3,982	4,000	(18)	100.00%	Hungary /Budapest	Investing in companies engaged in agricultural activities, as well as in food processing and agriculture-related areas.
<b>Subtotal</b>	<b><u>70,331</u></b>						
D-ÉG Thermoset Ltd 'u.l.'	-	n.a.	1,045	n.a.	46.99%	Hungary / Dunaújváros	Wholesale of hardware, plumbing and heating equipment and supplies
Company for Cash Services AD	392	4,650	2,463	709	25.00%	Bulgaria / Sofia	Other financial service activities, except insurance and pension funding
Bankart Procesiranje Placilnih Instrumentov d.o.o.	<u>7,219</u>	10,267	771	<u>1,208</u>	43.06%	Slovenia / Ljubjana	Data processing, web hosting services
<b>Subtotal</b>	<b><u>7,611</u></b>						
<b>Total</b>	<b><u>77,942</u></b>						

There are no material investments in associates owned by equity funds below 50% voting right and without control.

**NOTE 42: SIGNIFICANT SUBSIDIARIES AND ASSOCIATES (in HUF mn) [continued]****Significant associates and joint ventures [continued]**

Summarized financial and non-financial information of associates which are accounted according to IAS 28 and in line with IFRS 9 as at 31 December 2024 is as follows:

List of associated entities (amounts in HUF million)	Carrying amount	Shareholder's equity	Share capital	Profit after tax	Voting right	Country / Headquarter	Activity
PortfoLion Digital Venture Capital Fund I.	15,593	14,179	7,000	(7,479)	100.00%	Hungary /Budapest	Digital technology, solutions that strengthen the bank's innovation capacity (e.g. big data, financial software, payment solutions, blockchain etc.).
PortfoLion Regional Venture Capital Fund II.	15,672	15,511	17,847	(472)	49.88%	Hungary /Budapest	Investment in any industries and sectors, due to which international expansion of Hungarian enterprises can be realized.
PortfoLion Partner Venture Capital Fund	30,661	70,262	60,421	5,031	30.56%	Hungary /Budapest	Financing of domestic or foreign takeover, capital increase or merger in which the acquiring company is at least majority-owned by Hungarians.
PortfoLion Digital Venture Capital Fund II.	6,374	6,516	7,270	(687)	100.00%	Hungary /Budapest	IT, digital technology, fintech
PortfoLion Green Venture Capital Fund	<u>11</u>	35,298	33,571	234	100.00%	Hungary /Budapest	Investing in companies engaged in agricultural activities, as well as in food processing and agriculture-related areas.
<b>Subtotal</b>	<b><u>68,311</u></b>						
OTP-DayOne Magvető Fund	648	2,947	1,271	23	22.00%	Hungary /Budapest	Trusts, funds and similar financial entities
D-ÉG Thermoset Ltd 'u.l.'	-	n.a.	1,045	n.a.	46.99%	Hungary / Dunaujváros	Wholesale of hardware, plumbing and heating equipment and supplies
Company for Cash Services AD	392	4,319	1,982	(333)	25.00%	Bulgaria / Sofia	Other financial service activities, except insurance and pension funding
Bankart Procesiranje Placilnih Instrumentov d.o.o.	<u>7,219</u>	11,403	658	1,182	43.06%	Slovenia / Ljubjana	Data processing, web hosting services
<b>Subtotal</b>	<b><u>8,259</u></b>						
<b>Total</b>	<b><u>76,570</u></b>						

There are no material investments in associates owned by equity funds below 50% voting right and without control.

**NOTE 43: TRUST ACTIVITIES (in HUF mn)**

The Bank acts as a trustee for certain loans granted by companies or employers to their employees, mainly for housing purposes. The ultimate risk for these loans rests with the party advancing the funds. As these loans and related funds are not considered to be assets or liabilities of the Group, they have been excluded from the accompanying Consolidated Statement of Financial Position.

	<b>31/12/2025</b>	<b>31/12/2024</b>
The amount of loans managed by the Group as a trustee	38,040	37,412

**NOTE 44: CONCENTRATION OF ASSETS AND LIABILITIES**

	31/12/2025	31/12/2024
<b>In the percentage of the total assets</b>		
Receivables from, or securities issued by the Hungarian Government or the NBH	12.15%	12.92%

There were no other significant concentrations of the assets or liabilities of the Group either as at 31 December 2025 or as at 31 December 2024.

The Group continuously provides the NBH with reports on the extent of dependency on large depositors as well as the exposure of the biggest 50 depositors towards the Group.

Further to this obligatory reporting to the NBH, the Group pays particular attention on the exposure of its largest partners and cares for maintaining a closer relationship with these partners in order to secure the stability of the level of deposits.

The organisational unit of the Bank in charge of partner-risk management analyses the biggest partners on a constant basis and sets limits on the Bank's and the Group's exposure separately partner-by-partner. If necessary, it modifies partner-limits in due course thereby reducing the room for manoeuvring of the Treasury and other business areas.

The Bank's internal regulation (Limit-management regulation) controls risk management related to exposures of clients. The Bank makes a difference between clients or clients who are economically connected with each other, partners, partners operating in the same geographical region or in the same economic sector, exposures from customers. Limit-management regulation includes a specific range provision system used by the Bank to control risk exposures. This regulation has to be used by the Bank for its business (lending) risk-taking activity both in retail and corporate sector.

To specify credit risk limits Group strives their clients get an acceptable margin of risk based on their financial situation. In the Group limit system has to be provided a lower-level decision-making delegation.

If a Group member takes risk against a client or group of clients (either inside the local economy or outside), the client will be qualified as a group level risk and these limits will be specified at group level.

The validity period of this policy is 12 months. The limit shall be reviewed prior to the expiry date but at least once a year - based on the relevant information required to limit calculations.

**NOTE 45: EARNINGS PER SHARE**

Consolidated Earnings per share attributable to the ordinary shares of the Group are determined by dividing consolidated Net profit for the year attributable to ordinary shareholders, after the deduction of declared preference dividends, by the weighted average number of ordinary shares outstanding during the year. Dilutive potential ordinary shares are deemed to have been converted into ordinary shares.

<b>Earnings per share from continuing and discontinued operations</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Consolidated profit after income tax for the period attributable to ordinary shareholders (in HUF mn)	1,140,698	1,071,913
Weighted average number of ordinary shares outstanding during the year for calculating basic EPS (number of share)	257,181,338	264,542,718
<b>Basic Earnings per share (in HUF)</b>	<b><u>4,435</u></b>	<b><u>4,052</u></b>
Consolidated profit after income tax for the period attributable to ordinary shareholders (in HUF mn)	1,140,698	1,071,913
Modified weighted average number of ordinary shares outstanding during the year for calculating diluted EPS (number of share)	257,253,420	264,652,623
<b>Diluted Earnings per share (in HUF)</b>	<b><u>4,434</u></b>	<b><u>4,050</u></b>
<b>Earnings per share from continuing operations</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Consolidated profit after income tax for the period attributable to ordinary shareholders (in HUF mn)	1,140,698	1,052,157
Weighted average number of ordinary shares outstanding during the year for calculating basic EPS (number of share)	257,181,338	264,542,718
<b>Basic Earnings per share (in HUF)</b>	<b><u>4,435</u></b>	<b><u>3,977</u></b>
Consolidated profit after income tax for the period attributable to ordinary shareholders (in HUF mn)	1,140,698	1,052,157
Modified weighted average number of ordinary shares outstanding during the year for calculating diluted EPS (number of share)	257,253,420	264,652,623
<b>Diluted Earnings per share (in HUF)</b>	<b><u>4,434</u></b>	<b><u>3,976</u></b>
<b>Earnings per share from discontinued operations</b>	<b>31/12/2025</b>	<b>31/12/2024</b>
Consolidated profit after income tax for the period attributable to ordinary shareholders (in HUF mn)	-	19,756
Weighted average number of ordinary shares outstanding during the year for calculating basic EPS (number of share)	-	264,542,718
<b>Basic Earnings per share (in HUF)</b>	<b>=</b>	<b><u>75</u></b>
Consolidated profit after income tax for the period attributable to ordinary shareholders (in HUF mn)	-	19,756
Modified weighted average number of ordinary shares outstanding during the year for calculating diluted EPS (number of share)	-	264,652,623
<b>Diluted Earnings per share (in HUF)</b>	<b>=</b>	<b><u>75</u></b>

**NOTE 45: EARNINGS PER SHARE [continued]**

	<b>31/12/2025</b>	<b>31/12/2024</b>
Weighted average number of ordinary shares	280,000,010	280,000,010
Average number of Treasury shares	22,818,672	15,457,292
<b>Weighted average number of ordinary shares outstanding during the year for calculating basic EPS</b>	<b><u>257,181,338</u></b>	<b><u>264,542,718</u></b>
Dilutive effects of options issued in accordance with the remuneration policy and convertible into ordinary shares <sup>1</sup>	72,082	109,905
<b>The modified weighted average number of ordinary shares outstanding during the year for calculating diluted EPS</b>	<b><u>257,253,420</u></b>	<b><u>264,652,623</u></b>

<sup>1</sup> Both for the year 2025 and for the year 2024 the dilutive effect is in connection with the Remuneration Policy and the Management Option Program.

**NOTE 46: NET GAIN OR LOSS REALIZED ON FINANCIAL INSTRUMENTS (in HUF mn)**

31/12/2025	Net interest / similar to interest gain and loss	Net non-interest gain and loss	Loss allowance	Other Compre- hensive Income
Cash, amounts due from banks and balances with the National Banks	236,159	-	(460)	-
Placements with other banks	199,428	-	(140)	-
Repo receivables	24,410	-	(489)	-
Securities at amortized cost	355,461	(1,782)	5,558	-
Loans at amortized cost	1,773,539	44,925	(162,281)	-
Finance lease receivables	113,822	-	(129)	-
Other financial assets <sup>1</sup>	8,449	-	(3,699)	-
<b>Financial assets at amortized cost total</b>	<b><u>2,711,268</u></b>	<b><u>43,143</u></b>	<b><u>(161,640)</u></b>	<b><u>-</u></b>
Trading securities at fair value through profit or loss	-	22,721	-	-
Non-trading instruments mandatorily at fair value through profit or loss	15	21,953	-	-
Interest-bearing securities at fair value through other comprehensive income	70,962	(439)	1,859	7,180
Non-interest-bearing instruments at fair value through other comprehensive income	-	1,042	-	(57)
Loans mandatorily at fair value through profit or loss	<u>126,858</u>	<u>(3,440)</u>	<u>111</u>	<u>-</u>
<b>Financial assets at fair value total</b>	<b><u>197,835</u></b>	<b><u>41,837</u></b>	<b><u>1,970</u></b>	<b><u>7,123</u></b>
<b>Total result on financial assets</b>	<b><u>2,909,103</u></b>	<b><u>84,980</u></b>	<b><u>(159,670)</u></b>	<b><u>7,123</u></b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks	(119,863)	-	-	-
Repo liabilities	(15,527)	-	-	-
Deposits from customers	(606,830)	581,651	-	-
Liabilities from issued securities	(136,190)	-	-	-
Leasing liabilities	(4,053)	-	-	-
Subordinated bonds and loans	(40,924)	-	-	-
<b>Financial liabilities at amortized cost total</b>	<b><u>(923,387)</u></b>	<b><u>581,651</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Financial liabilities designated at fair value through profit or loss</b>	<b><u>(823)</u></b>	<b><u>228</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Total result on financial liabilities</b>	<b><u>(924,210)</u></b>	<b><u>581,879</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Derivative financial instruments<sup>1</sup></b>	<b><u>(44,321)</u></b>	<b><u>(1,316)</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Total result on financial instruments</b>	<b><u>1,940,572</u></b>	<b><u>665,543</u></b>	<b><u>(159,670)</u></b>	<b><u>7,123</u></b>

<sup>1</sup> Gains from other financial assets and derivative financial instruments recognized in net interest income as Income similar to interest income.

Current year change of derivative financial assets and liabilities held-for-trading and designated as hedge accounting by types of results in the profit or loss

31/12/2025	Held-for-trading	Hedge accounting
<b>Balance as at 1 January</b>	<b>38,424</b>	<b>35,776</b>
<b>Change in current period through p/l</b>	<b>(2,275)</b>	<b>(10,353)</b>
on interest income/interest expense	20,206	(7,961)
on net results on derivative instruments	47,698	32,694
on revaluation difference	(70,179)	(35,086)
Realized result on closed deals /matured deals	4,574	(6,548)
Foreign currency translation difference	<u>(1,397)</u>	<u>(751)</u>
<b>Closing balance</b>	<b><u>39,326</u></b>	<b><u>18,124</u></b>

**NOTE 46: NET GAIN OR LOSS REALIZED ON FINANCIAL INSTRUMENTS (in HUF mn)**  
**[continued]**

31/12/2024	Net interest / similar to interest gain and loss	Net non-interest gain and loss	Loss allowance	Other Compre- hensive Income
Cash, amounts due from banks and balances with the National Banks	171,238	-	(740)	-
Placements with other banks	238,235	-	(1,303)	-
Repo receivables	20,336	-	75	-
Securities at amortized cost	352,733	(9,495)	(10,059)	-
Loans at amortized cost	1,582,749	39,569	(94,870)	-
Finance lease receivables	110,830	-	6,518	-
Other financial assets <sup>1</sup>	7,052	-	17	-
<b>Financial assets at amortized cost total</b>	<b><u>2,483,173</u></b>	<b><u>30,074</u></b>	<b><u>(100,362)</u></b>	<b><u>-</u></b>
Trading securities at fair value through profit or loss	-	12,118	-	-
Non-trading instruments mandatorily at fair value through profit or loss	1,465	6,043	-	-
Interest-bearing securities at fair value through other comprehensive income	60,806	(1,477)	(29,848)	33,347
Non-interest-bearing instruments at fair value through other comprehensive income	-	1,082	-	14,404
Loans mandatorily at fair value through profit or loss	99,559	25,746	5,504	-
<b>Financial assets at fair value total</b>	<b><u>161,830</u></b>	<b><u>43,512</u></b>	<b><u>(24,344)</u></b>	<b><u>47,751</u></b>
<b>Total result on financial assets</b>	<b><u>2,645,003</u></b>	<b><u>73,586</u></b>	<b><u>(124,706)</u></b>	<b><u>47,751</u></b>
Amounts due to banks, the National Governments, deposits from the National Banks and other banks	(121,536)	-	-	-
Repo liabilities	(11,049)	-	-	-
Deposits from customers	(462,682)	477,930	-	-
Liabilities from issued securities	(157,008)	-	-	-
Leasing liabilities	(3,557)	-	-	-
Subordinated bonds and loans	(35,471)	-	-	-
<b>Financial liabilities at amortized cost total</b>	<b><u>(791,303)</u></b>	<b><u>477,930</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Financial liabilities designated at fair value through profit or loss</b>	<b><u>(1,344)</u></b>	<b><u>1,240</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Total result on financial liabilities</b>	<b><u>(792,647)</u></b>	<b><u>479,170</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Derivative financial instruments<sup>1</sup></b>	<b><u>(107,016)</u></b>	<b><u>12,004</u></b>	<b><u>-</u></b>	<b><u>-</u></b>
<b>Total result on financial instruments</b>	<b><u>1,745,340</u></b>	<b><u>564,760</u></b>	<b><u>(124,706)</u></b>	<b><u>47,751</u></b>

<sup>1</sup> Gains from other financial assets and derivative financial instruments recognized in net interest income as Income similar to interest income.

Current year change of derivative financial assets and liabilities held for trading and designated as hedge accounting by types of results in the profit or loss

31/12/2024	Held-for-trading	Hedge accounting
<b>Balance as at 1 January</b>	<b>13,141</b>	<b>(21,932)</b>
<b>Change in current period through p/l</b>	<b>712</b>	<b>75,875</b>
on interest income/interest expense	34,595	(10,189)
on net results on derivative instruments	(122,489)	51,705
on revaluation difference	88,606	34,359
Realized result on closed deals /matured deals	24,077	(18,960)
Foreign currency translation difference	494	793
<b>Closing balance</b>	<b><u>38,424</u></b>	<b><u>35,776</u></b>

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn)**

In determining the fair value of a financial asset or liability the Group uses the market price in the case of instruments that are quoted on an active market. In most cases market price is not publicly available, so the Group has to make assumptions or use valuation techniques to determine the fair value of a financial instrument. See Note 47.4. for more information about fair value classes applied for financial assets and liabilities measured at fair value in these financial statements.

To provide a reliable estimate of the fair value of those financial instruments that are originally measured at amortized cost, the Group used the discounted cash flow analyses (loans, placements with other banks, repo receivables, amounts due to banks, repo liabilities, deposits from customers). The fair value of issued securities and subordinated bonds is based on quoted prices (e.g. Reuters). Cash and amounts due from banks and balances with the National Banks represent amounts available immediately thus the fair value equals to the cost.

The assumptions used when calculating the fair value of financial assets and liabilities when using valuation technique are the following:

- the discount rates are the risk-free rates related to the denomination currency adjusted by the appropriate risk premium as of the end of the reporting period,
- the contractual cash flows are considered for the performing loans and for the non-performing loans, the amortized cost less impairment is considered as fair value,
- the future cash flows for floating interest rate instruments are estimated from the yield curves as of the end of the reporting period,
- the fair value of the deposit which can be due in demand cannot be lower than the amount payable on demand.

Classes of assets and liabilities not measured at fair value in the Consolidated Statement of Financial Position, the income approach was used to convert future cash flows to a single current amount. Fair value of current assets is equal to carrying amount, fair value of liabilities from issued securities and other bond-type classes of assets and liabilities not measured at fair value measured based on Reuters market rates, and the fair value of other classes not measured at fair value of the Consolidated Statement of Financial Position is measured at discounted cash flow method. Fair value of loans, net of loss allowance for loans measured at discount rate adjustment technique, the discount rate is derived from observed rates of return for comparable assets or liabilities that are traded in the market.

Methods and significant assumptions used to determine fair value of the different levels of financial instruments:

- Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities.
- Level 2: inputs other than quoted prices included within Level 1, that are observable for the asset or liability either directly or indirectly.
- Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

Asset held for sale is valued at fair value less cost to sell, that is in this case equal to the sales price and would be classified as Level 3 fair value.

**Use of modified yield curve**

Yield curves derived from Hungarian government bonds (“ÁKK curve”) have become distorted due to certain market events, which means that real liquidity has concentrated on certain part of the yield curve. Therefore, a modified yield curve - which is not observable on the market - has been used at the concerning fair value calculations. This yield curve is based on the relevant yield curve points of the original ÁKK curve. Based on Management’s discretion fair value calculated with modified yield curves can represent the perspective of market participants reliable at current market conditions.

Modified yield curve was used for calculating fair value in case of subsidized personal loans represented in “Loans mandatorily measured at fair value through profit or loss” line.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.1. Fair value of financial assets and liabilities at amortized cost by level of the fair value hierarchy and their carrying amount**

31/12/2025	Carrying amount	Fair value	Level 1	Level 2	Level 3
Cash, amounts due from banks and balances with the National Banks	4,965,635	4,963,538	3,723,381	1,240,157	-
Placements with other banks	1,991,489	2,008,169	351,767	1,552,044	104,358
Repo receivables	237,144	237,213	1,588	235,625	-
Securities at amortized cost	7,925,465	7,826,366	6,805,384	991,444	29,538
Loans at amortized cost	22,299,578	22,746,863	-	7,025	22,739,838
Finance lease receivables	1,588,550	1,626,971	-	386,456	1,240,515
Other financial assets	288,380	289,575	-	-	289,575
<b>Total financial assets at amortized cost</b>	<b><u>39,296,241</u></b>	<b><u>39,698,695</u></b>	<b><u>10,882,120</u></b>	<b><u>4,412,751</u></b>	<b><u>24,403,824</u></b>
Amounts due to the National Governments, to the National Banks and other banks	1,490,921	1,478,238	478,927	479,412	519,899
Repo liabilities	166,809	168,872	-	168,872	-
Deposits from customers <sup>1</sup>	33,734,267	33,685,943	-	18,151,791	15,534,152
Liabilities from issued securities	2,512,635	2,550,549	1,475,420	700,501	374,628
Leasing liabilities	82,401	82,422	-	170	82,252
Other financial liabilities	772,385	752,619	-	-	752,619
Subordinated bonds and loans	486,084	486,600	476,284	-	10,316
<b>Total financial liabilities at amortized cost</b>	<b><u>39,245,502</u></b>	<b><u>39,205,243</u></b>	<b><u>2,430,631</u></b>	<b><u>19,500,746</u></b>	<b><u>17,273,866</u></b>
31/12/2024	Carrying amount	Fair value	Level 1	Level 2	Level 3
Cash, amounts due from banks and balances with the National Banks	6,079,012	6,080,255	4,964,693	1,115,562	-
Placements with other banks	1,891,901	1,907,253	220,867	1,461,918	224,468
Repo receivables	331,837	332,039	3,768	328,271	-
Securities at amortized cost	7,447,177	7,254,449	6,356,814	870,803	26,832
Loans at amortized cost	20,290,381	20,507,024	-	8,315	20,498,709
Finance lease receivables	1,511,477	1,564,724	-	365,783	1,198,941
Other financial assets	292,320	291,485	-	-	291,485
<b>Total financial assets at amortized cost</b>	<b><u>37,844,105</u></b>	<b><u>37,937,229</u></b>	<b><u>11,546,142</u></b>	<b><u>4,150,652</u></b>	<b><u>22,240,435</u></b>
Amounts due to the National Governments, to the National Banks and other banks	2,022,191	1,999,976	508,358	926,517	565,101
Repo liabilities	132,137	135,771	-	135,771	-
Deposits from customers <sup>1</sup>	31,666,398	31,616,807	-	16,752,706	14,864,101
Liabilities from issued securities	2,593,124	2,613,242	2,207,606	-	405,636
Leasing liabilities	82,109	83,601	-	259	83,342
Other financial liabilities	818,406	793,524	-	-	793,524
Subordinated bonds and loans	369,359	372,137	349,895	8,879	13,363
<b>Total financial liabilities at amortized cost</b>	<b><u>37,683,724</u></b>	<b><u>37,615,058</u></b>	<b><u>3,065,859</u></b>	<b><u>17,824,132</u></b>	<b><u>16,725,067</u></b>

<sup>1</sup>Deposit from customers includes the fair value changes on hedged deposits involved in portfolio hedge of interest rate risk.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.2. Fair value of derivative instruments**

The Group regularly enters into hedging transactions in order to decrease its financial risks. However some economically hedging transaction do not meet the criteria to qualify as hedge accounting, therefore these transactions were accounted for as derivatives held for trading.

The assessment of the hedge effectiveness (both for fair value hedges and cash flow hedges) to determine the economic relationship between the hedged item and the hedging instrument is accomplished with prospective scenario analysis via different rate shift scenarios of the relevant risk factor(s) of the hedged risk component(s). The fair value change of the hedged item and the hedging instrument is compared in the different scenarios. Economic relationship is justified if the change of the fair value of the hedged item and the hedging instrument are in the opposite direction and the absolute changes are similar amounts. The hedge ratio is determined as the ratio of the notional of the hedged item and the notional of the hedging instrument. The sources of hedge ineffectiveness are the not hedged risk components (e.g. change of cross currency basis spreads in case of interest rate risk hedges), slight differences in maturity dates and interest payment dates in case of fair value hedges, and differences between the carrying amount of the hedged item and the carrying amount of the hedging instrument in case of FX hedges (e.g. caused by interest rate risk components in the fair value of the hedging instrument).

The summary of the derivatives held for trading and derivatives designated as hedge accounting of the Group are as follows:

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.2. Fair value of derivative instruments [continued]**

	31/12/2025		31/12/2024							
	Before netting Assets	Liabilities	Netting	After netting Assets	Liabilities	Before netting Assets	Liabilities	Netting	After netting Assets	Liabilities
<b>Held for trading derivative financial instruments</b>										
<b>Interest rate derivatives</b>										
Interest rate swaps	108,785	(93,931)	74,899	33,886	(19,032)	144,530	(123,151)	99,513	45,017	(23,638)
Cross currency interest rate swaps	3,773	(1,714)	-	3,773	(1,714)	10,472	(10,558)	-	10,472	(10,558)
OTC options	894	(896)	-	894	(896)	1,278	(1,281)	-	1,278	(1,281)
Forward rate agreement	496	(31)	496	=	465	219	(172)	219	=	47
<b>Total interest rate derivatives (OTC derivatives)</b>	<b>113,948</b>	<b>(96,572)</b>	<b>75,395</b>	<b>38,553</b>	<b>(21,177)</b>	<b>156,499</b>	<b>(135,162)</b>	<b>99,732</b>	<b>56,767</b>	<b>(35,430)</b>
<b>Foreign exchange derivatives</b>										
Foreign exchange swaps	44,750	(33,298)	-	44,750	(33,298)	38,573	(49,720)	-	38,573	(49,720)
Foreign exchange forward contracts	11,228	(14,841)	-	11,228	(14,841)	17,051	(8,595)	-	17,051	(8,595)
OTC options	2,445	(2,065)	-	2,445	(2,065)	1,433	(825)	-	1,433	(825)
Foreign exchange spot conversion	197	(245)	=	197	(245)	180	(288)	=	180	(288)
<b>Total foreign exchange derivatives (OTC derivatives)</b>	<b>58,620</b>	<b>(50,449)</b>	<b>=</b>	<b>58,620</b>	<b>(50,449)</b>	<b>57,237</b>	<b>(59,428)</b>	<b>=</b>	<b>57,237</b>	<b>(59,428)</b>
<b>Equity stock and index derivatives</b>										
Commodity Swaps	3,297	(2,604)	-	3,297	(2,604)	10,472	(10,477)	-	10,472	(10,477)
Equity swaps	8,219	(273)	=	8,219	(273)	=	(1,194)	=	=	(1,194)
<b>OTC derivatives total</b>	<b>11,516</b>	<b>(2,877)</b>	<b>=</b>	<b>11,516</b>	<b>(2,877)</b>	<b>10,472</b>	<b>(11,671)</b>	<b>=</b>	<b>10,472</b>	<b>(11,671)</b>
Exchange traded futures and options	168	(648)	=	168	(648)	1,334	(728)	=	1,334	(728)
<b>Total equity stock and index derivatives</b>	<b>11,684</b>	<b>(3,525)</b>	<b>=</b>	<b>11,684</b>	<b>(3,525)</b>	<b>11,806</b>	<b>(12,399)</b>	<b>=</b>	<b>11,806</b>	<b>(12,399)</b>
<b>Derivatives held for risk management not designated in hedge</b>										
Interest rate swaps	34,831	(27,971)	27,971	6,860	-	49,053	(38,201)	37,433	11,620	(768)
Foreign exchange swaps	2,822	(4,093)	-	2,822	(4,093)	9,112	(4,995)	-	9,112	(4,995)
Cross currency interest rate swaps	2,052	(2,021)	=	2,052	(2,021)	5,971	(1,069)	=	5,971	(1,069)
<b>Total derivatives held for risk management not designated in hedge</b>	<b>39,705</b>	<b>(34,085)</b>	<b>27,971</b>	<b>11,734</b>	<b>(6,114)</b>	<b>64,136</b>	<b>(44,265)</b>	<b>37,433</b>	<b>26,703</b>	<b>(6,832)</b>
<b>Total held for trading derivative financial instruments</b>	<b>223,957</b>	<b>(184,631)</b>	<b>103,366</b>	<b>120,591</b>	<b>(81,265)</b>	<b>289,678</b>	<b>(251,254)</b>	<b>137,165</b>	<b>152,513</b>	<b>(114,089)</b>

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.2. Fair value of derivative instruments [continued]**

Micro hedge	Before netting		31/12/2025	After netting		Before netting		31/12/2024	After netting	
	Assets	Liabilities	Netting	Assets	Liabilities	Assets	Liabilities	Netting	Assets	Liabilities
<b>Derivatives designated in fair value hedges</b>										
Interest rate swaps	33,647	(18,431)	12,484	21,163	(5,947)	41,859	(30,282)	19,957	21,902	(10,325)
Cross currency interest rate swaps	<u>3,929</u>	<u>(5,371)</u>	-	<u>3,929</u>	<u>(5,371)</u>	<u>18,190</u>	<u>(4,280)</u>	-	<u>18,190</u>	<u>(4,280)</u>
<b>Total derivatives designated in fair value hedges</b>	<b><u>37,576</u></b>	<b><u>(23,802)</u></b>	<b><u>12,484</u></b>	<b><u>25,092</u></b>	<b><u>(11,318)</u></b>	<b><u>60,049</u></b>	<b><u>(34,562)</u></b>	<b><u>19,957</u></b>	<b><u>40,092</u></b>	<b><u>(14,605)</u></b>
<b>Total derivatives held for risk management (OTC derivatives) micro portfolio</b>	<b><u>37,576</u></b>	<b><u>(23,802)</u></b>	<b><u>12,484</u></b>	<b><u>25,092</u></b>	<b><u>(11,318)</u></b>	<b><u>60,049</u></b>	<b><u>(34,562)</u></b>	<b><u>19,957</u></b>	<b><u>40,092</u></b>	<b><u>(14,605)</u></b>
Macro hedge	Before netting		31/12/2025	After netting		Before netting		31/12/2024	After netting	
	Assets	Liabilities	Netting	Assets	Liabilities	Assets	Liabilities	Netting	Assets	Liabilities
<b>Derivative financial instruments designated as hedge accounting</b>										
<b>Derivatives designated in fair value hedges</b>										
Interest rate swaps	<u>4,979</u>	<u>(629)</u>	<u>446</u>	<u>4,533</u>	<u>(183)</u>	<u>10,289</u>	-	-	<u>10,289</u>	-
<b>Total derivatives designated in macro fair value hedges</b>	<b><u>4,979</u></b>	<b><u>(629)</u></b>	<b><u>446</u></b>	<b><u>4,533</u></b>	<b><u>(183)</u></b>	<b><u>10,289</u></b>	<b>=</b>	<b>=</b>	<b><u>10,289</u></b>	<b>=</b>

**Financial assets subject to offsetting, netting arrangement as at 31 December 2025**

31/12/2025	Offsetting recognized on the balance sheet			Netting potential not recognized on the balance sheet			Assets not subject to netting arrangements	Total assets	Maximum exposure to risk
	Gross assets before offset	Offsetting with gross liabilities	Net assets recognized on the statement of financial position	Financial liabilities	Collateral received	Assets after consideration of netting potential	Assets recognized on the statement of financial position	Recognized in the statement of financial position	After consideration of netting potential
Derivative financial instruments	182,739	(116,296)	66,443	(32,501)	(43,413)	(9,471)	83,773	150,216	74,302

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.2. Fair value of derivative instruments [continued]****Financial liabilities subject to offsetting, netting arrangement as at 31 December 2025**

31/12/2025	Offsetting recognized on the balance sheet			Netting potential not recognized on the balance sheet			Liabilities not subject to netting arrangements	Total liabilities	Maximum exposure to risk
	Gross liabilities before offset	Offsetting with gross assets	Net liabilities recognized on the statement of financial position	Financial assets	Collateral pledged	Liabilities after consideration of netting potential	Liabilities recognized on the statement of financial position	Recognized in the statement of financial position	After consideration of netting potential
Derivative financial instruments	140,993	(116,296)	24,697	(32,501)	(19,826)	(27,630)	68,069	92,766	40,439

**Financial assets subject to offsetting, netting arrangement as at 31 December 2024**

31/12/2024	Offsetting recognized on the balance sheet			Netting potential not recognized on the balance sheet			Assets not subject to netting arrangements	Total assets	Maximum exposure to risk
	Gross assets before offset	Offsetting with gross liabilities	Net assets recognized on the statement of financial position	Financial liabilities	Collateral received	Assets after consideration of netting potential	Assets recognized on the statement of financial position	Recognized in the statement of financial position	After consideration of netting potential
Derivative financial instruments	235,661	(157,122)	78,539	(39,854)	(77,022)	(38,337)	124,355	202,894	86,018

**Financial liabilities subject to offsetting, netting arrangement as at 31 December 2024**

31/12/2024	Offsetting recognized on the balance sheet			Netting potential not recognized on the balance sheet			Liabilities not subject to netting arrangements	Total liabilities	Maximum exposure to risk
	Gross liabilities before offset	Offsetting with gross assets	Net liabilities recognized on the statement of financial position	Financial assets	Collateral pledged	Liabilities after consideration of netting potential	Liabilities recognized on the statement of financial position	Recognized in the statement of financial position	After consideration of netting potential
Derivative financial instruments	191,806	(157,122)	34,684	(39,854)	(41,981)	(47,151)	94,010	128,694	46,859

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting**

Interest rate risk management is centralized at the Group. Interest rate risk exposures in major currencies are managed at OTP Headquarter on a consolidated level. Although risk exposures in local currencies are managed at subsidiary level, the respective decisions are subject to Headquarter ALCO approval. Interest rate risk is measured by simulating NII and EVE under different stress and plan scenarios, the established risk limits are described in „OTP Bank’s Group-Level Regulations on the Management of Liquidity Risk and Interest Rate Risk of Banking Book”. The interest rate risk management activity aims to stabilize NII within the approved risk limits.

The risk management objective of these hedge relationships is to mitigate the risk of clean fair value (i.e. excluding accrued interest) change of MIRS loans due to the change of interest rate reference indices (BUBOR, EURIBOR, LIBOR, etc.) of the respective currency.

The ineffective part of fair value hedge accounting is presented on Interest income / Interest expense in the Consolidated Statement of Profit or Loss.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]**

Amount, timing and uncertainty of future cash flows – hedging instruments as at 31 December 2025 (in foreign currency million)

Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total	
Micro hedge Fair value hedge	Interest rate risk	Interest rate swap	HUF						
			Notional	(5,996)	(9,936)	365,335	642,095	395,652	<b>1,387,150</b>
			Average Interest Rate (%)	2.46%	2.47%	4.91%	6.39%	6.95%	
			EUR						
			Notional	-	14	(790)	(2,594)	243	<b>(3,127)</b>
			Average Interest Rate (%)	-	-	3.64%	2.72%	3.15%	
			USD						
			Notional	-	-	(378)	(1,385)	20	<b>(1,743)</b>
			Average Interest Rate (%)	-	-	4.05%	3.87%	1.65%	
Fair value hedge	Foreign exchange & Interest rate risk	Cross currency interest rate swap	EUR/HUF						
			Notional	-	-	2	4	8	<b>14</b>
			Average Interest Rate (%)	(1.67%)	(1.74%)	(1.74%)	(1.81%)	(1.82%)	
			Average FX Rate	310.88	309.58	309.84	307.91	307.71	



**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]****Amount, timing and uncertainty of future cash flows – hedging instruments as at 31 December 2024 (in foreign currency million)**

Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total
<b>Micro hedge</b>								
<b>Fair value hedge</b>	<b>Interest rate risk</b>	<b>Interest rate swap</b>						
		HUF						
		Notional	(10,000)	(3,000)	(193,376)	221,893	(41,000)	<b>(25,483)</b>
		Average Interest Rate (%)	12.20%	1.20%	(5.24%)	5.26%	4.20%	
		EUR						
		Notional	-	-	(439)	(2,657)	452	<b>(2,644)</b>
		Average Interest Rate (%)	-	-	3.89%	3.17%	-	
		USD						
		Notional	-	-	-	(1,013)	47	<b>(966)</b>
		Average Interest Rate (%)	-	-	-	3.77%	4.18%	
		JPY						
		Notional	-	-	4,500	-	-	<b>4,500</b>
		Average Interest Rate (%)	-	-	0.22%	-	-	
<b>Fair value hedge</b>	<b>Foreign exchange &amp; Interest rate risk</b>	<b>Cross currency interest rate swap</b>						
		EUR/HUF						
		Notional	-	1	2	6	9	<b>18</b>
		Average Interest Rate (%)	(1.63%)	(1.69%)	(1.69%)	(1.76%)	(1.82%)	
		Average FX Rate	310.53	310.04	310.04	308.93	307.71	

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]****Amount, timing and uncertainty of future cash flows – hedging instruments as at 31 December 2024 (in foreign currency million) [continued]**

Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total
<b>Micro hedge Fair value hedge</b>	<b>Foreign exchange risk</b>	<b>Cross currency interest rate swap</b>						
		EUR/HUF						
		Notional	-	-	191	1,474	-	<b>1,665</b>
		Average FX Rate	-	426.83	379.97	383.10	-	
		RON/HUF						
		Notional	-	175	450	425	-	<b>1,050</b>
		Average FX Rate	-	79.76	80.30	75.17	-	
		RUB/HUF						
		Notional	-	-	-	2,700	-	<b>2,700</b>
		Average FX Rate	-	-	-	3.74	-	
JPY/HUF								
Notional	-	-	4,500	-	-	<b>4,500</b>		
Average FX Rate	-	-	2.43	-	-			
Type of hedge	Type of risk	Type of instrument	Within one month	Within three months and over one month	Within one year and over three months	Within five years and over one year	More than five years	Total
<b>Macro hedge Fair value hedge</b>	<b>Interest rate risk</b>	<b>Interest rate swap</b>						
		EUR						
		Notional	-	-	(345)	(1,205)	(170)	<b>(1,720)</b>
Average Interest Rate (%)	-	-	3.16%	2.75%	2.51%			

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]**

As at 31 December 2025 is as follows:

Type of hedge	Type of instrument	Type of risk	Nominal amount of the hedging instrument	Carrying amount of the hedging instrument as at 31 December 2025			Line item in the consolidated statement of financial position where the hedging instrument is located	Changes in fair value used for calculating hedge ineffectiveness for the year ended as at 31 December 2025		
				Before netting Assets	Liabilities	Netting			After netting Assets	Liabilities
Micro hedge Fair value hedge	IRS	Interest rate risk	4,484,411	33,647	(18,431)	12,484	21,163	(5,947)	Derivative financial instruments designated as hedge accounting	329
	CCIRS	FX & IR risk	4,291	-	(1,054)	-	-	(1,054)	Derivative financial instruments designated as hedge accounting	3
	CCIRS	FX risk	<u>1,254,330</u>	<u>3,929</u>	<u>(4,317)</u>	-	<u>3,929</u>	<u>(4,317)</u>	Derivative financial instruments designated as hedge accounting	<u>(1,243)</u>
<b>Micro fair value hedges total</b>			<b><u>5,743,032</u></b>	<b><u>37,576</u></b>	<b><u>(23,802)</u></b>	<b><u>12,484</u></b>	<b><u>25,092</u></b>	<b><u>(11,318)</u></b>		<b><u>(911)</u></b>
Type of hedge	Type of instrument	Type of risk	Nominal amount of the hedging instrument	Carrying amount of the hedging instrument as at 31 December 2025			Line item in the consolidated statement of financial position where the hedging instrument is located	Changes in fair value used for calculating hedge ineffectiveness for the year ended as at 31 December 2025		
				Before netting Assets	Liabilities	Netting			After netting Assets	Liabilities
Macro hedge Fair value hedge	IRS	Interest rate risk	<u>668,669</u>	<u>4,979</u>	<u>(629)</u>	<u>446</u>	<u>4,533</u>	<u>(183)</u>	Derivative financial instruments designated as hedge accounting	<u>497</u>
<b>Macro fair value hedges total</b>			<b><u>668,669</u></b>	<b><u>4,979</u></b>	<b><u>(629)</u></b>	<b><u>446</u></b>	<b><u>4,533</u></b>	<b><u>(183)</u></b>		<b><u>497</u></b>

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]**

As at 31 December 2024 is as follows:

Type of hedge	Type of instrument	Type of risk	Nominal amount of the hedging instrument	Carrying amount of the hedging instrument as at 31 December 2024			Line item in the consolidated statement of financial position where the hedging instrument is located	Changes in fair value used for calculating hedge ineffectiveness for the year ended as at 31 December 2024		
				Before netting Assets	Liabilities	Netting			After netting Assets	Liabilities
Micro hedge Fair value hedge	IRS	Interest rate risk	3,297,470	41,859	(30,282)	19,957	21,902	(10,325)	Derivative financial instruments designated as hedge accounting	7,801
	CCIRS	FX & IR risk	5,265	-	(1,764)	-	-	(1,764)	Derivative financial instruments designated as hedge accounting	(859)
	CCIRS	FX risk	<u>600,883</u>	<u>18,190</u>	<u>(2,516)</u>	=	<u>18,190</u>	<u>(2,516)</u>	Derivative financial instruments designated as hedge accounting	<u>11,104</u>
<b>Micro fair value hedges total</b>			<b><u>3,903,618</u></b>	<b><u>60,049</u></b>	<b><u>(34,562)</u></b>	<b><u>19,957</u></b>	<b><u>40,092</u></b>	<b><u>(14,605)</u></b>		<b><u>18,046</u></b>
Type of hedge	Type of instrument	Type of risk	Nominal amount of the hedging instrument	Carrying amount of the hedging instrument as at 31 December 2024			Line item in the consolidated statement of financial position where the hedging instrument is located	Changes in fair value used for calculating hedge ineffectiveness for the year ended as at 31 December 2024		
				Before netting Assets	Liabilities	Netting			After netting Assets	Liabilities
Macro hedge Fair value hedge	IRS	Interest rate risk	<u>705,355</u>	<u>10,289</u>	=	=	<u>10,289</u>	=	Derivative financial instruments designated as hedge accounting	<u>3,875</u>
<b>Macro fair value hedges total</b>			<b><u>705,355</u></b>	<b><u>10,289</u></b>	<b>=</b>	<b>=</b>	<b><u>10,289</u></b>	<b>=</b>		<b><u>3,875</u></b>

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]**

As at 31 December 2025 is as follows:

Type of hedge	Type of risk	Carrying amount of the hedged item as at 31 December 2025		Amount of fair value hedge adjustments on the hedged item included in the carrying amount of the hedged item for the year ended 31 December 2025		Line item in the consolidated statement of financial position in which the hedged item is included
		Assets	Liabilities	Assets	Liabilities	
<b>Micro hedge</b>						
<b>Fair value hedge</b>						
Loans	Interest rate risk	283,861	-	(5,158)	-	Loans at amortized cost
Loans	Interest rate risk	-	14,062	-	(167)	Amounts due to banks, the National Governments, deposits from the National Banks and other banks
Government bonds	Interest rate risk	970,235	-	456	-	Securities at amortized cost
Government bonds	Interest rate risk	835,641	-	(6,441)	-	Securities at fair value through other comprehensive income
Other bonds	Interest rate risk	-	1,933,075	-	27,199	Liabilities from issued securities
Other bonds	Interest rate risk	-	454,862	-	8,350	Subordinated bonds and loans
Loans	Foreign exchange & Interest rate risk	2,273	-	(23)	-	Loans at amortized cost
Loans	Foreign exchange risk	1,059,952	-	-	-	Loans at amortized cost
Refinanced loans	Interest rate risk	-	28,245	-	317	Amounts due to banks, the National Governments, deposits from the National Banks and other banks
Government bonds	Foreign exchange risk	<u>32,134</u>	=	=	=	Securities at amortized cost
<b>Micro fair value hedges total</b>		<b><u>3,184,096</u></b>	<b><u>2,430,244</u></b>	<b><u>(11,166)</u></b>	<b><u>35,699</u></b>	

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]**

As at 31 December 2025 is as follows [continued]:

Type of hedge	Type of risk	Carrying amount of the hedged item as at 31 December 2025		Amount of fair value hedge adjustments on the hedged item included in the carrying amount of the hedged item for the year ended 31 December 2025		Line item in the consolidated statement of financial position in which the hedged item is included
		Assets	Liabilities	Assets	Liabilities	
Macro hedge						
Fair value hedge						
Customer deposits	Portfolio risk	=	<u>734,488</u>	=	<u>1,503</u>	Deposits from customers
<b>Macro fair value hedges total</b>		=	<u><b>734,488</b></u>	=	<u><b>1,503</b></u>	

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]**

As at 31 December 2024 is as follows:

Type of hedge	Type of risk	Carrying amount of the hedged item as at 31 December 2024		Amount of fair value hedge adjustments on the hedged item included in the carrying amount of the hedged item for the year ended 31 December 2024		Line item in the consolidated statement of financial position in which the hedged item is included
		Assets	Liabilities	Assets	Liabilities	
<b>Micro hedge</b>						
<b>Fair value hedge</b>						
Loans	Interest rate risk	180,000	-	1,024	-	Loans at amortized cost
Loans	Interest rate risk	-	144,441	-	(3,618)	Amounts due to banks, the National Governments, deposits from the National Banks and other banks
Government bonds	Interest rate risk	481,715	-	1,376	-	Securities at amortized cost
Government bonds	Interest rate risk	290,270	-	(20,342)	-	Securities at fair value through other comprehensive income
Other bonds	Interest rate risk	4,101	-	(99)	-	Securities at fair value through other comprehensive income
Other bonds	Interest rate risk	-	1,796,848	-	43,723	Liabilities from issued securities
Other bonds	Interest rate risk	-	249,936	-	(3,474)	Subordinated bonds and loans
Loans	Foreign exchange & Interest rate risk	3,499	-	36	-	Loans at amortized cost
Loans	Foreign exchange risk	678,845	-	-	-	Loans at amortized cost
Refinanced loans	Interest rate risk	-	224,979	-	4,948	Amounts due to banks, the National Governments, deposits from the National Banks and other banks
Government bonds	Foreign exchange risk	11,307	-	-	-	Securities at fair value through other comprehensive income
Government bonds	Foreign exchange risk	86,541	-	-	-	Securities at amortized cost
Other securities	Other risk	=	14,053	=	=	Liabilities from issued securities
<b>Micro fair value hedges total</b>		<b><u>1,736,278</u></b>	<b><u>2,430,257</u></b>	<b><u>(18,005)</u></b>	<b><u>41,579</u></b>	

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]**

As at 31 December 2024 is as follows [continued]:

Type of hedge	Type of risk	Carrying amount of the hedged item as at 31 December 2024		Amount of fair value hedge adjustments on the hedged item included in the carrying amount of the hedged item for the year ended 31 December 2024		Line item in the consolidated statement of financial position in which the hedged item is included
		Assets	Liabilities	Assets	Liabilities	
<b>Macro hedge</b>						
<b>Fair value hedge</b>						
Customer deposits	Portfolio risk	=	<u>719,517</u>	=	<u>8,209</u>	Deposits from customers
<b>Macro fair value hedges total</b>		=	<u>719,517</u>	=	<u>8,209</u>	

Change in basis swap spread recognised in the consolidated other comprehensive income related fair value hedges as follows:

Type of risk	Carrying amount of the hedged item		Items recognised in the consolidated other comprehensive income for the year 2025	Change in the items recognised in other comprehensive income for the year 2025	Line item in the consolidated statement of financial position in which the hedged item is included
	Assets	Liabilities			
FX risk	1,059,952	-	(1,228)	(1,239)	Loans at amortised cost
FX risk	-	-	-	51	Securities at fair value through other comprehensive income
FX risk	32,134	-	203	(347)	Securities at amortized cost
FX risk	=	=	=	(16)	Liabilities from issued securities
<b>Total</b>	<u>1,092,086</u>	=	<u>(1,025)</u>	<u>(1,551)</u>	

Type of risk	Carrying amount of the hedged item		Items recognised in the consolidated other comprehensive income for the year 2024	Change in the items recognised in other comprehensive income for the year 2024	Line item in the consolidated statement of financial position in which the hedged item is included
	Assets	Liabilities			
FX risk	678,846	-	11	(217)	Loans at amortised cost
FX risk	11,308	-	(51)	10	Securities at fair value through other comprehensive income
FX risk	86,541	-	549	549	Securities at amortized cost
FX risk	=	<u>14,053</u>	<u>16</u>	<u>16</u>	Liabilities from issued securities
<b>Total</b>	<u>776,695</u>	<u>14,053</u>	<u>525</u>	<u>358</u>	

On Group level there weren't any cash flow hedges for the year ended 31 December 2025 and 2024, respectively.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]****Net investment hedge as at 31 December 2025**

Details of the Group's activities in relation to hedges of its net investment in EUR against foreign exchange movements are, as follows:

31/12/2025	Change in fair value of hedged item for ineffectiveness assessment	Translation difference	Balances remaining in the Translation difference for hedge accounting is no longer applied
Net assets of subsidiaries where the investment is in EUR	-	96,444	(80,164)

Details of the EUR issued bonds used as hedging instruments and hedge effectiveness is as follows:

31/12/2025	Carrying amount		Changes in fair value of hedging instruments used for measuring hedge ineffectiveness			
	Notional amount	Liabilities	Total	Effective part recognized in other comprehensive income	Hedge ineffectiveness recognized in statement of profit or loss	Reclassification into statement of profit or loss
Eur issued bonds	385,400	385,400	24,690	24,690	-	-

The following table shows maturity of the hedging instruments:

31/12/2025	Less than 1 month	1 to 3 months	3 to 12 months	1 to 5 years	Over 5 years	Total
Eur issued bonds	-	-	-	385,400	-	385,400

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.3. Types of hedge accounting [continued]****Net investment hedge as at 31 December 2024**

Details of the Group's activities in relation to hedges of its net investment in EUR against foreign exchange movements are, as follows:

31/12/2024	Change in fair value of hedged item for ineffectiveness assessment	Translation difference	Balances remaining in the Translation difference for hedge accounting is no longer applied
Net assets of subsidiaries where the investment is in EUR	-	168,230	63,997

Details of the EUR issued bonds used as hedging instruments and hedge effectiveness is as follows:

31/12/2024	Carrying amount		Changes in fair value of hedging instruments used for measuring hedge ineffectiveness			
	Notional amount	Liabilities	Total	Effective part recognized in other comprehensive income	Hedge ineffectiveness recognized in statement of profit or loss	Reclassification into statement of profit or loss
Eur issued bonds	410,090	410,090	(27,310)	(27,310)	-	-

The following table shows maturity of the hedging instruments:

31/12/2024	Less than 1 month	1 to 3 months	3 to 12 months	1 to 5 years	Over 5 years	Total
Eur issued bonds	-	-	-	410,090	-	410,090

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels**

The following table shows an analysis of financial instruments recorded at fair value by level of the fair value hierarchy:

31/12/2025	Total	Level 1	Level 2	Level 3
<b>Financial assets at fair value through profit or loss</b>	<b>425,213</b>	<b>246,215</b>	<b>163,911</b>	<b>15,087</b>
<i>Trading securities at fair value through profit or loss</i>	<i>226,760</i>	<i>182,032</i>	<i>44,728</i>	<i>-</i>
<i>Positive fair value of derivative financial assets held for trading</i>	<i>120,591</i>	<i>168</i>	<i>112,479</i>	<i>7,944</i>
<i>Non-trading instruments mandatorily at fair value through profit or loss<sup>1</sup></i>	<i>77,862</i>	<i>64,015</i>	<i>6,704</i>	<i>7,143</i>
Interest-bearing securities at fair value through other comprehensive income <sup>2</sup>	<b>1,954,513</b>	1,282,350	536,819	135,344
Non-interest bearing instruments at fair value through other comprehensive income <sup>3</sup>	<b>91,901</b>	47,344	30,603	13,954
Loans mandatorily at fair value through profit or loss	<b>1,941,222</b>	-	-	1,941,222
Equity instruments measured at fair value <sup>4</sup>	<b>70,331</b>	-	-	70,331
Positive fair value of derivative financial assets designated as fair value hedge	<b><u>29,625</u></b>	-	<u>29,625</u>	-
<b>Financial assets measured at fair value total</b>	<b><u>4,512,805</u></b>	<b><u>1,575,909</u></b>	<b><u>760,958</u></b>	<b><u>2,175,938</u></b>
Financial liabilities designated at fair value through profit or loss	<b>90,340</b>	-	-	90,340
Negative fair value of held-for-trading derivative financial liabilities	<b>81,265</b>	648	80,617	-
Negative fair value of derivative financial liabilities designated as fair value hedge	<b><u>11,501</u></b>	-	<u>11,501</u>	-
<b>Financial liabilities measured at fair value total</b>	<b><u>183,106</u></b>	<b><u>648</u></b>	<b><u>92,118</u></b>	<b><u>90,340</u></b>

<sup>1</sup> The portfolio in level 3 mainly includes Visa C shares, East West Venture Capital Fund and TCE Fund.

<sup>2</sup> The portfolio in level 3 includes HUF 125,131 million Ukrainian and HUF 10,213 million Russian government bonds.

<sup>3</sup> The portfolio in level 3 includes mainly Visa A preferred stock (in the book of OTP banka d.d. Croatia) and Borika AD (in the book of DSK Bank).

<sup>4</sup> The detailed list of equity investments measured at fair value categorized in level 3 is presented in Note 42.

The fair value of investment properties is presented in Note 14 and they are categorized in level 3.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels [continued]**

The following table shows an analysis of financial instruments recorded at fair value by level of the fair value hierarchy:

31/12/2024	Total	Level 1	Level 2	Level 3
<b>Financial assets at fair value through profit or loss</b>	<b>743,400</b>	<b>184,743</b>	<b>548,838</b>	<b>9,819</b>
<i>Trading securities at fair value through profit or loss</i>	<i>514,357</i>	<i>123,379</i>	<i>390,978</i>	<i>-</i>
<i>Positive fair value of derivative financial assets held for trading</i>	<i>152,513</i>	<i>1,336</i>	<i>151,177</i>	<i>-</i>
<i>Non-trading instruments mandatorily at fair value through profit or loss<sup>1</sup></i>	<i>76,530</i>	<i>60,028</i>	<i>6,683</i>	<i>9,819</i>
Interest-bearing securities at fair value through other comprehensive income <sup>2</sup>	<b>1,622,824</b>	1,156,908	297,759	168,157
Non-interest bearing instruments at fair value through other comprehensive income <sup>3</sup>	<b>82,729</b>	37,569	31,887	13,273
Loans mandatorily at fair value through profit or loss	<b>1,559,781</b>	-	-	1,559,781
Equity instruments measured at fair value <sup>4</sup>	<b>68,311</b>			68,311
Positive fair value of derivative financial assets designated as fair value hedge	<b>50,381</b>	-	50,381	-
<b>Financial assets measured at fair value total</b>	<b><u>4,127,426</u></b>	<b><u>1,379,220</u></b>	<b><u>928,865</u></b>	<b><u>1,819,341</u></b>
Financial liabilities designated at fair value through profit or loss	<b>72,490</b>	-	-	72,490
Negative fair value of held-for-trading derivative financial liabilities	<b>114,089</b>	728	112,162	1,199
Negative fair value of derivative financial liabilities designated as fair value hedge	<b>14,605</b>	-	14,605	-
<b>Financial liabilities measured at fair value total</b>	<b><u>201,184</u></b>	<b><u>728</u></b>	<b><u>126,767</u></b>	<b><u>73,689</u></b>

<sup>1</sup> The portfolio in level 3 mainly includes Visa C shares, East West Venture Capital Fund and TCE Fund.

<sup>2</sup> The portfolio in level 3 includes HUF 144,138 million Ukrainian and HUF 24,019 million Russian government bonds.

<sup>3</sup> The portfolio in level 3 includes mainly Visa A preferred stock (in the book of OTP banka d.d. Croatia) and Borika AD (in the book of DSK Bank).

<sup>4</sup> The detailed list of equity investments measured at fair value categorized in level 3 is presented in Note 42.

The fair value of investment properties is presented in Note 14 and they are categorized in level 3.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels [continued]****Movements in Level 3 financial instruments measured at fair value**

The following table shows a reconciliation of the opening and closing amount of Level 3 financial assets and liabilities which are recorded at fair value:

31/12/2025	Opening balance	Purchase / Issuance / Disbursement (+)	Settlement / Close / Sale (-)	FVA (+/-)	FX effect / Revaluation	Other	Closing balance
Positive fair value of derivative financial assets held for trading	-	-	-	9,138	-	(1,194)	7,944
Non-trading instruments mandatorily at fair value through profit or loss	9,819	36	-	(1,539)	(819)	(354)	7,143
Interest-bearing securities at fair value through other comprehensive income	168,157	63,896	(62,884)	(7,789)	(24,637)	(1,399)	135,344
Non-interest-bearing instruments at fair value through other comprehensive income	13,273	26	-	289	(543)	909	13,954
Loans mandatorily at fair value through profit or loss <sup>1</sup>	1,559,781	488,958	(101,142)	(6,088)	(443)	156	1,941,222
Equity instruments measured at fair value	<u>68,311</u>	<u>7,423</u>	=	<u>13,482</u>	<u>(4,692)</u>	<u>(14,193)</u>	<u>70,331</u>
<b>Financial assets measured at fair value total</b>	<b><u>1,819,341</u></b>	<b><u>560,339</u></b>	<b><u>(164,026)</u></b>	<b><u>7,493</u></b>	<b><u>(31,134)</u></b>	<b><u>(16,075)</u></b>	<b><u>2,175,938</u></b>
Financial liabilities designated at fair value through profit or loss	72,490	-	(1,517)	7,483	-	11,884	90,340
Negative fair value of held-for-trading derivative financial liabilities	<u>1,199</u>	=	<u>(1,194)</u>	=	<u>(5)</u>	=	=
<b>Financial liabilities designated at fair value total</b>	<b><u>73,689</u></b>	<b>=</b>	<b><u>(2,711)</u></b>	<b><u>7,483</u></b>	<b><u>(5)</u></b>	<b><u>11,884</u></b>	<b><u>90,340</u></b>

<sup>1</sup> HUF 111 million gain from fair value adjustment resulting from risk factors and HUF 6,192 million loss from fair value adjustment resulting from market factors are included into FVA change for the current period at loans mandatorily measured at fair value through profit or loss.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels [continued]****Movements in Level 3 financial instruments measured at fair value [continued]**

The following table shows a reconciliation of the opening and closing amount of Level 3 financial assets and liabilities which are recorded at fair value:

31/12/2024	Opening balance	Purchase / Issuance / Disbursement (+)	Settlement / Close / Sale (-)	FVA (+/-)	Transfer (+/-)	FX effect / Revaluation	Other	Closing balance
Non-trading instruments mandatorily at fair value through profit or loss	12,283	-	-	(1,794)	-	(209)	(461)	<b>9,819</b>
Interest-bearing securities at fair value through other comprehensive income	106,416	90,917	(27,726)	(9,350)	-	1,978	5,922	<b>168,157</b>
Non-interest-bearing instruments at fair value through other comprehensive income	6,643	1,763	(22)	-	989	1,919	1,981	<b>13,273</b>
Loans mandatorily at fair value through profit or loss <sup>1</sup>	1,400,485	235,187	(104,638)	28,833	-	2	(88)	<b>1,559,781</b>
Equity instruments measured at fair value	<u>44,162</u>	<u>18,976</u>	<u>(57)</u>	<u>2,797</u>	=	<u>2,433</u>	=	<b><u>68,311</u></b>
<b>Financial assets measured at fair value total</b>	<b><u>1,569,989</u></b>	<b><u>346,843</u></b>	<b><u>(132,443)</u></b>	<b><u>20,486</u></b>	<b><u>989</u></b>	<b><u>6,123</u></b>	<b><u>7,354</u></b>	<b><u>1,819,341</u></b>
Financial liabilities designated at fair value through profit or loss	70,707	-	(1,522)	2,000	-	-	1,305	<b>72,490</b>
Negative fair value of held-for-trading derivative financial liabilities	<u>3,708</u>	=	=	<u>(2,506)</u>	=	<u>(3)</u>	=	<b><u>1,199</u></b>
<b>Financial liabilities designated fair value total</b>	<b><u>74,415</u></b>	<b>=</b>	<b><u>(1,522)</u></b>	<b><u>(506)</u></b>	<b>=</b>	<b><u>(3)</u></b>	<b><u>1,305</u></b>	<b><u>73,689</u></b>

<sup>1</sup> HUF 5,504 million gain from fair value adjustment resulting from risk factors and HUF 23,331 million gain from fair value adjustment resulting from market factors are included into FVA change for the current period at loans mandatorily measured at fair value through profit or loss.

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels [continued]****Valuation techniques on Level 2 financial instruments**

The fair value of Level 2 instruments is calculated by discounting their expected interest and capital cash flows. Discounting is done with the respective swap curve of each currency.

**Valuation techniques and sensitivity analysis on Level 3 financial instruments**

Sensitivity analysis is performed on products with significant unobservable inputs (Level 3) to generate a range of reasonably possible alternative valuations. The sensitivity methodologies applied take account of the nature of the valuation techniques used, as well as the availability and reliability of observable proxy and historical data and the impact of using alternative models.

The calculation is based on a range or spread data of reliable reference source or a scenario based on relevant market analysis alongside the impact of using alternative models. Sensitivities are calculated without reflecting the impact of any diversification in the portfolio.

**Unobservable inputs used in measuring fair value**

Type of financial instrument	Presentation in the Statement of Financial Position	Valuation technique	Significant unobservable input	Range of estimates for unobservable input
VISA C shares	Financial assets at fair value through profit or loss	Market approach combined with expert judgement.	Illiquidity	+ 12% / (12%)
MFB refinanced loans	Loans mandatorily at fair value through profit or loss	Discounted cash flow model	Probability of default	+ 20% / (20)%
Subsidized personal loans	Loans mandatorily at fair value through profit or loss	Discounted cash flow model	Probability of default	+ 20% / (20)%
Subsidized personal loans	Loans mandatorily at fair value through profit or loss	Discounted cash flow model	Operational costs	+20% / (20)%
Subsidized personal loans	Loans mandatorily at fair value through profit or loss	Discounted cash flow model	Demography	Change in the cash flow estimation + 5% / (5)%
Ministry of Finance of Russia	Securities at fair value through other comprehensive income	Discounted cash flow model	Credit risk	+15% / (15)%
Ministry of Finance of Ukraine	Securities at fair value through other comprehensive income	Discounted cash flow model	Credit risk	+1% / (1)%
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Discounted cash flow model	Probability of default	+20% / (20)%
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Discounted cash flow model	Operational costs	+20% / (20)%
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Discounted cash flow model	Demography	Change in the cash flow estimation + 5% / (5)%

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels [continued]****The effect of unobservable inputs on fair value measurement**

Although the Group believes that its estimates of fair value are appropriate, the use of different methodologies or assumptions could lead to different measurements of fair value. For fair value measurements in Level 3 changing the assumptions used to reasonably possible alternative assumptions would have the following effects.

31/12/2025	Presentation in the Statement of Financial Position	Unobservable inputs	Book value	Fair values		Effect on profit and loss	
				Favourable	Unfavourable	Favourable	Unfavourable
VISA C shares	Financial assets at fair value through profit or loss	Illiquidity	1,329	1,489	1,169	160	(160)
MFB refinanced loans	Loans mandatorily at fair value through profit or loss	Probability of default	15,300	15,626	14,974	326	(326)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Probability of default	1,065,200	1,065,780	1,064,613	580	(587)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Operational costs	1,065,200	1,071,294	1,058,826	6,094	(6,374)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Demography	1,065,200	1,065,427	1,065,016	227	(184)
Russian government bonds	Securities at fair value through other comprehensive income	Credit risk	10,213	17,607	2,819	7,394	(7,394)
Ukrainian government bonds	Securities at fair value through other comprehensive income	Credit risk	125,131	127,442	122,874	2,311	(2,257)
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Probability of default	856,860	857,124	856,600	264	(260)
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Operational costs	856,860	863,211	850,658	6,351	(6,202)
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Demography	223,095	223,538	222,684	443	(411)
<b>Total</b>			<b><u>5,284,388</u></b>	<b><u>5,308,538</u></b>	<b><u>5,260,233</u></b>	<b><u>24,150</u></b>	<b><u>(24,155)</u></b>

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels [continued]****The effect of unobservable inputs on fair value measurement [continued]**

31/12/2024	Presentation in the Statement of Financial Position	Unobservable	Book value	Fair values		Effect on profit and loss	
				Favourable	Unfavourable	Favourable	Unfavourable
VISA C shares	Financial assets at fair value through profit or loss	Illiquidity	3,304	3,700	2,908	396	(396)
MFB refinanced loans	Loans mandatorily at fair value through profit or loss	Probability of default	15,094	15,663	14,525	569	(569)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Probability of default	980,378	980,991	979,766	613	(612)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Operational costs	980,378	987,263	973,579	6,885	(6,799)
Subsidised personal loans	Loans mandatorily at fair value through profit or loss	Demography	980,378	981,238	979,693	860	(685)
Russian government bonds	Securities at fair value through other comprehensive income	Credit risk	24,019	34,777	13,261	10,758	(10,758)
Ukrainian government bonds	Securities at fair value through other comprehensive income	Credit risk	144,138	146,217	142,104	2,079	(2,034)
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Probability of default	558,812	559,071	558,553	259	(259)
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Operational costs	558,812	565,807	552,001	6,995	(6,811)
Subsidized mortgage loan for families "CSOK"	Loans mandatorily at fair value through profit or loss	Demography	110,042	110,236	109,663	194	(379)
<b>Total</b>			<b><u>4,355,355</u></b>	<b><u>4,384,963</u></b>	<b><u>4,326,053</u></b>	<b><u>29,608</u></b>	<b><u>(29,302)</u></b>

**NOTE 47: FAIR VALUE OF FINANCIAL INSTRUMENTS (in HUF mn) [continued]****47.4. Fair value levels [continued]****The effect of unobservable inputs on fair value measurement [continued]**

The favourable and unfavourable effects of using reasonably possible alternative assumptions for the valuation of Visa C shares have been calculated by modifying the discount rate used for the valuation by +/-12% as being the best estimates of the management as at 31 December 2025 and 31 December 2024, respectively.

In the case of Hungarian Development Bank (“MFB”) refinancing loans and subsidised personal loans the Bank calculated the favourable and unfavourable effects of using reasonably possible alternative assumptions by modifying the rates of probability of default by +/- 20% as one of the most significant unobservable inputs.

In case of subsidised personal loans operational cost and factors related to demography are considered as unobservable inputs to the applied fair value calculation model in addition to credit risk.

The Bank calculated the favourable and unfavourable effects of using reasonably possible alternative assumptions by modifying the rates of operational costs by +/- 20% as one of the most significant unobservable inputs.

In case of subsidised personal loans cash flow estimation are based on assumption related to the future number of childbirths performed by the debtors both in the current and the comparative period. According to the assumptions used in comparative period 15% of the debtors will not fulfill the conditions of the subsidy determined by the government after 5 years (“breach of conditions”), thereby debtors will be obliged to pay back the interest subsidy given in advance. Furthermore, in this case subsidised loans are converted to loans provided based on market conditions. Loans are prepaid by the government as part of the subsidy after the second and the third childbirth following the signatory of the loan contract. The Bank calculated the favourable and unfavourable effects of using reasonably possible alternative assumptions by modifying the demographical assumption of breach of conditions by +/- 5% as the most significant unobservable input in the cash flow estimation.

Since 2022 the Bank has used a new and more detailed model for cash flow calculations of the subsidised personal loans. The new model uses more scenarios compared to the previous one. These scenarios based on the above-mentioned events (child births after signatory and breach of conditions) and also the event of divorce. The model uses public statistical information for these events to estimate. The Bank calculated the favourable and unfavourable effects of using reasonably possible alternative assumptions by modifying the demographical assumption of future child births by +/-5% as one of the most significant unobservable inputs in the cash flow estimation.

The favourable and unfavourable effects of using reasonably possible alternative assumptions for the valuation of FVOCI securities have been calculated by modifying the discount rate used for the valuation by +/-15% and +/- 1% as being the best estimates of the management as at 31 December 2025 and 31 December 2024, respectively.

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn)**

The Group distinguishes business and geographical segments. The report on the base of the business and geographical segments is reported below.

The reportable segments of the Group on the base of IFRS 8 are as the follows:

OTP Core Hungary, Merkantil Group, Asset Management subsidiaries, Other subsidiaries, Bulgaria, Croatia, Slovenia, Romania, Serbia, Ukraine, Russia, Montenegro, Albania, Moldova, Uzbekistan. Although Romanian segment was classified as discontinued operation from 2023 in these consolidated financial statements, segment reporting contained it as a separate segment (in the comparative period) because – in line with the structure of the financial statements monitored by the management (Stock Exchange Report) – the Romanian operation was presented in a way as if it was classified as continuing operation. The Romanian segment was deconsolidated in July 2024.

OTP Core is an economic unit for measuring the result of core business activity of the Group in Hungary. Financials of OTP Core are calculated from the partially Consolidated Financial Statements of the companies engaged in the Group's underlying banking operation in Hungary.

These companies include OTP Bank Hungary Plc., OTP Mortgage Bank Ltd., OTP Building Society Ltd, OTP Factoring Ltd, OTP Financial Point Ltd., OTP Bank Employee Stock Ownership Plan Organization, OTP Card Factory Ltd. (was eliminated from the fourth quarter of 2025), OTP Facility Management Llc (merged into CIL Babér Ltd. in the fourth quarter of 2024), Monicompltd., SimplePay Plc. (previous name: OTP Mobile Service Llc.), OTP Real Estate Point Llc., OTP Home Solutions Llc., Bajor-Polár Center, Real Estate Management Ltd., CIL Babér Ltd., Bank Center No. 1. Ltd. and MFM Project Investment and Development Ltd. (in the fourth quarter of 2024, MFM Project Investment and Development Ltd. and Bajor-Polár Center Real Estate Management Ltd merged into Bank Center No. 1. Ltd) OD Ltd., HelloPay Plc. and companies providing intragroup financing.

The results of foreign factoring companies OTP Factoring Ukraine LLC (it was merged into OTP Bank JSC (Ukraine) in the fourth quarter of 2024), OTP Factoring Serbia d.o.o., and OTP Debt Collection d.o.o., as well as the foreign leasing companies are included into the relevant foreign bank's segment.

The Other subsidiaries include, among others: OTP Real Estate Ltd., OTP Life Annuity Ltd, OTP Funds Servicing and Consulting Ltd.

The reportable business and geographical segments of the Group are those components where:

- separated income and expenses, assets and liabilities can be identified and assignable to the segments,
- transactions between the different segments were eliminated,
- the main decisive board of the Group regularly controls the operating results,
- separated financial information is available.

**Explanation to the segments in the following table below:**

**3; 4; 6:** The segments distinguished on geographical basis contain banks in given country and sometimes other financial institutions (like leasing or factoring companies) or other companies. The income generated in the given segments arise mainly from providing financial services like: collecting deposits, granting loans, leasing and treasury activities, payment and investment services and other financial services.

**7:** Merkantil Group conducts leasing activities in Hungary, with its source of income being provided leasing services (financing cars and production equipment).

**8:** Income arising in this segment is mainly fee income of fund management companies in Hungary, Bulgaria, Serbia, Ukraine (and in Romania until its sale in October 2024) based on their assets in investment funds or other managed assets.

**9:** The activities of other Hungarian and foreign subsidiaries are very divergent, so their income also originates from different sources. The main part of the income in the Other subsidiaries segment comes from the activities of OTP Funds Servicing and Consulting, OTP Real Estate, OTP Real Estate Investment Fund Management and PortfoLion Funds.

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below:

As at 31 December 2025

Main components of the consolidated statement of profit or loss in HUF million	OTP Group - in the consolidated statement of profit or loss - structure of accounting reports	Adjustments on the accounting in Recognized Income	OTP Group - in the consolidated statement of profit or loss - structure of management reports	Hungarian segment and other foreign subsidiaries not reported in "Foreign bank segment" subtotal (without adjustments)	Foreign banks in EU subtotal (without adjustments)	Foreign banks not in EU subtotal (without adjustments)	Eliminations and adjustments
	a	b	1=a+b; 1=2+3+4+5	2	3	4	5
<b>Consolidated adjusted profit after income tax for the year from continued and discontinued operations</b>	<b>1,146,325</b>	<b>480</b>	<b>1,146,805</b>	<b>316,063</b>	<b>371,694</b>	<b>437,451</b>	<b>21,597</b>
<b>Profit after income tax for the year from discontinued operations</b>	-	-	-	-	-	-	-
<b>Consolidated adjusted profit after income tax for the year from continued operation</b>	<b>1,146,325</b>	<b>480</b>	<b>1,146,805</b>	<b>316,063</b>	<b>371,694</b>	<b>437,451</b>	<b>21,597</b>
<b>Profit before income tax</b>	<b>1,401,251</b>	<b>102,006</b>	<b>1,503,257</b>	<b>471,125</b>	<b>439,726</b>	<b>570,265</b>	<b>22,141</b>
<b>Adjusted operating profit</b>	<b>1,621,351</b>	<b>81,330</b>	<b>1,702,681</b>	<b>533,506</b>	<b>466,261</b>	<b>710,311</b>	<b>(7,397)</b>
<b>Adjusted total income</b>	<b>3,063,991</b>	<b>(145,000)</b>	<b>2,918,991</b>	<b>1,118,916</b>	<b>775,451</b>	<b>1,045,755</b>	<b>(21,131)</b>
Adjusted net interest income	1,940,572	4,053	1,944,625	686,581	563,233	697,570	(2,759)
Adjusted net profit							
from fees and commissions	1,026,247	(421,923)	604,324	288,984	178,502	137,480	(642)
Adjusted other net non-interest income	97,172	272,870	370,042	143,351	33,716	210,705	(17,730)
<b>Adjusted other administrative expenses</b>	<b>(1,442,640)</b>	<b>226,330</b>	<b>(1,216,310)</b>	<b>(585,410)</b>	<b>(309,190)</b>	<b>(335,444)</b>	<b>13,734</b>
Personnel expenses	(630,276)	1	(630,275)	(275,962)	(164,879)	(190,852)	1,418
Depreciation and amortization	(153,126)	18,889	(134,237)	(77,161)	(24,517)	(31,975)	(584)
Other general expenses	(659,238)	207,440	(451,798)	(232,287)	(119,794)	(112,617)	12,900
<b>Gains from derecognition of financial assets at amortized cost</b>	<b>(699)</b>	<b>-</b>	<b>(699)</b>	<b>(4,320)</b>	<b>2,655</b>	<b>987</b>	<b>(21)</b>
<b>Modification loss</b>	<b>(9,383)</b>	<b>-</b>	<b>(9,383)</b>	<b>(8,946)</b>	<b>-</b>	<b>(437)</b>	<b>-</b>
<b>Total risk costs</b>	<b>(210,018)</b>	<b>20,676</b>	<b>(189,342)</b>	<b>(49,115)</b>	<b>(29,190)</b>	<b>(140,596)</b>	<b>29,559</b>
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	(158,075)	(2,658)	(160,733)	1,734	(23,883)	(138,253)	(331)
Goodwill impairment	(674)	674	-	-	-	-	-
Other impairment (adjustment)	(51,269)	22,660	(28,609)	(50,849)	(5,307)	(2,343)	29,890
from this: Adjusted impairment under IAS 36	(5,633)	(3,726)	(9,359)	(8,846)	(343)	(161)	(9)
<b>Income tax</b>	<b>(254,926)</b>	<b>(101,526)</b>	<b>(356,452)</b>	<b>(155,062)</b>	<b>(68,032)</b>	<b>(132,814)</b>	<b>(544)</b>
<b>Total Assets</b>	<b>45,427,144</b>	<b>-</b>	<b>45,427,144</b>	<b>72,151,593</b>	<b>18,314,058</b>	<b>11,432,176</b>	<b>(56,470,683)</b>
<b>Total Liabilities</b>	<b>39,801,528</b>	<b>-</b>	<b>39,801,528</b>	<b>60,421,174</b>	<b>16,000,821</b>	<b>9,821,407</b>	<b>(46,441,874)</b>

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below [continued]:

As at 31 December 2025 [continued]

Main components of the consolidated statement of profit or loss in HUF million [continued]	Hungarian segment and other foreign subsidiaries not reported in "Foreign bank segment" subtotal (without adjustments) 2=6+...+9	OTP CORE (Hungary)  6	Merkantil Group (Hungary)  7	Asset Management subsidiaries  8	Other subsidiaries  9
<b>Consolidated adjusted profit after income tax for the year</b>	<b>316,063</b>	<b>264,454</b>	<b>4,403</b>	<b>24,422</b>	<b>22,784</b>
Profit before income tax	471,125	409,099	8,475	26,809	26,742
Adjusted operating profit	533,506	460,417	12,618	26,808	33,663
Adjusted total income	1,118,916	977,858	28,577	35,153	77,328
Adjusted net interest income	686,581	654,815	25,656	82	6,028
Adjusted net profit					-
from fees and commissions	288,984	247,158	569	33,813	7,444
Adjusted other net non-interest income	143,351	75,885	2,352	1,258	63,856
Adjusted other administrative expenses	<b>(585,410)</b>	<b>(517,441)</b>	<b>(15,959)</b>	<b>(8,345)</b>	<b>(43,665)</b>
Personnel expenses	(275,962)	(244,619)	(8,669)	(5,360)	(17,314)
Depreciation and amortization	(77,161)	(69,208)	(1,708)	(148)	(6,097)
Other general expenses	(232,287)	(203,614)	(5,582)	(2,837)	(20,254)
Gains from derecognition of financial assets at amortized cost	<b>(4,320)</b>	<b>(4,538)</b>	<b>218</b>	-	-
Modification loss	<b>(8,946)</b>	<b>(8,510)</b>	<b>(436)</b>	-	-
Total risk costs	<b>(49,115)</b>	<b>(38,270)</b>	<b>(3,925)</b>	<b>1</b>	<b>(6,921)</b>
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	1,734	3,860	(2,077)	1	(50)
Goodwill impairment	-	-	-	-	-
Other impairment (adjustment)	(50,849)	(42,130)	(1,848)	-	(6,871)
from this: Adjusted impairment under IAS 36	(8,846)	(3,102)	(253)	(1)	(5,490)
<b>Income tax</b>	<b>(155,062)</b>	<b>(144,645)</b>	<b>(4,072)</b>	<b>(2,387)</b>	<b>(3,958)</b>
<b>Total Assets</b>	<b>72,151,593</b>	<b>20,063,104</b>	<b>2,843</b>	<b>51,609</b>	<b>52,034,037</b>
<b>Total Liabilities</b>	<b>60,421,174</b>	<b>16,784,267</b>	<b>948</b>	<b>13,529</b>	<b>43,622,430</b>

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below [continued]:

As at 31 December 2025 [continued]

Main components of the consolidated statement of profit or loss in HUF million [continued]	Foreign banks in EU subtotal (without adjustments) 3=10+...+12	DSK Bank AD (Bulgaria) 10	OTP banka d.d. (Croatia) 11	OTP banka d.d. (Slovenia) 12
<b>Consolidated adjusted profit after income tax for the year</b>	<b>371,694</b>	<b>211,270</b>	<b>54,592</b>	<b>105,832</b>
<b>Profit before income tax</b>	<b>439,726</b>	<b>246,033</b>	<b>66,889</b>	<b>126,804</b>
<b>Adjusted operating profit</b>	<b>466,261</b>	<b>263,096</b>	<b>69,635</b>	<b>133,530</b>
<b>Adjusted total income</b>	<b>775,451</b>	<b>396,069</b>	<b>143,651</b>	<b>235,731</b>
Adjusted net interest income	563,233	276,402	106,903	179,928
Adjusted net profit	-	-	-	-
from fees and commissions	178,502	94,067	31,441	52,994
Adjusted other net non-interest income	33,716	25,600	5,307	2,809
<b>Adjusted other administrative expenses</b>	<b>(309,190)</b>	<b>(132,973)</b>	<b>(74,016)</b>	<b>(102,201)</b>
Personnel expenses	(164,879)	(70,673)	(38,769)	(55,437)
Depreciation and amortization	(24,517)	(11,623)	(6,589)	(6,305)
Other general expenses	(119,794)	(50,677)	(28,658)	(40,459)
<b>Gains from derecognition of financial assets at amortized cost</b>	<b>2,655</b>	<b>1,775</b>	<b>-</b>	<b>880</b>
<b>Modification loss</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total risk costs</b>	<b>(29,190)</b>	<b>(18,838)</b>	<b>(2,746)</b>	<b>(7,606)</b>
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	(23,883)	(19,034)	3,145	(7,994)
Goodwill impairment	-	-	-	-
Other impairment (adjustment)	(5,307)	196	(5,891)	388
from this: Adjusted impairment under IAS 36	(343)	(598)	255	-
<b>Income tax</b>	<b>(68,032)</b>	<b>(34,763)</b>	<b>(12,297)</b>	<b>(20,972)</b>
<b>Total Assets</b>	<b>18,314,058</b>	<b>8,507,136</b>	<b>3,878,564</b>	<b>5,928,358</b>
<b>Total Liabilities</b>	<b>16,000,821</b>	<b>7,406,875</b>	<b>3,412,253</b>	<b>5,181,693</b>

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below [continued]:

As at 31 December 2025 [continued]

Main components of the consolidated statement of profit or loss in HUF million [continued]	Foreign banks not in EU subtotal (without adjustments) 4=13+...+19	OTP banka Srbija a.d. (Serbia) 13	OTP Bank JSC (Ukraine) 14	JSC "OTP Bank" (Russia) and Touch Bank 15	Crnogorska komercijalna banka a.d. (Montenegro) 16	Banka OTP Albania SHA (Albania) 17	OTP Bank S.A. (Moldova) 18	JSCMB Ipoteka Bank (Uzbekistan) 19
<b>Consolidated adjusted profit after income tax for the year</b>	<b>437,451</b>	<b>79,322</b>	<b>55,849</b>	<b>201,785</b>	<b>22,376</b>	<b>18,597</b>	<b>10,027</b>	<b>49,495</b>
Profit before income tax	570,265	90,815	66,446	295,988	26,356	22,075	11,499	57,086
Adjusted operating profit	710,311	97,282	73,522	415,347	26,908	21,544	11,456	64,252
Adjusted total income	1,045,755	161,849	108,652	544,919	47,569	39,913	26,145	116,708
Adjusted net interest income	697,570	118,297	96,238	296,644	36,581	33,531	17,901	98,378
Adjusted net profit								
from fees and commissions	137,480	26,552	7,816	73,390	10,020	3,895	2,331	13,476
Adjusted other net non-interest income	210,705	17,000	4,598	174,885	968	2,487	5,913	4,854
Adjusted other administrative expenses	(335,444)	(64,567)	(35,130)	(129,572)	(20,661)	(18,369)	(14,689)	(52,456)
Personnel expenses	(190,852)	(33,075)	(20,938)	(77,128)	(9,398)	(8,184)	(8,605)	(33,524)
Depreciation and amortization	(31,975)	(5,475)	(2,965)	(11,561)	(2,446)	(2,175)	(1,560)	(5,793)
Other general expenses	(112,617)	(26,017)	(11,227)	(40,883)	(8,817)	(8,010)	(4,524)	(13,139)
Gains from derecognition of financial assets at amortized cost	987	(33)	148	1,352	(169)	12	(203)	(120)
Modification loss	(437)	(243)	(162)	-	(32)	-	-	-
Total risk costs	(140,596)	(6,191)	(7,062)	(120,711)	(351)	519	246	(7,046)
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	(138,253)	(5,608)	(4,708)	(123,196)	155	73	607	(5,576)
Goodwill impairment	-	-	-	-	-	-	-	-
Other impairment (adjustment)	(2,343)	(583)	(2,354)	2,485	(506)	446	(361)	(1,470)
from this: Adjusted impairment under IAS 36	(161)	(79)	-	-	(109)	-	27	-
Income tax	(132,814)	(11,493)	(10,597)	(94,203)	(3,980)	(3,478)	(1,472)	(7,591)
<b>Total Assets</b>	<b>11,432,176</b>	<b>3,438,979</b>	<b>1,139,284</b>	<b>3,320,292</b>	<b>818,039</b>	<b>389,355</b>	<b>841,801</b>	<b>1,484,426</b>
<b>Total Liabilities</b>	<b>9,821,407</b>	<b>2,988,818</b>	<b>927,074</b>	<b>2,880,047</b>	<b>692,118</b>	<b>324,108</b>	<b>765,142</b>	<b>1,244,100</b>

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below [continued]:

As at 31 December 2024

Main components of the consolidated statement of profit or loss in HUF million	OTP Group - in the consolidated statement of profit or loss - structure of accounting reports	Adjustments on the accounting in Recognized Income	OTP Group - in the consolidated statement of profit or loss - structure of management reports	Hungarian segment and other foreign subsidiaries not reported in "Foreign bank segment" subtotal (without adjustments)	Foreign banks in EU subtotal (without adjustments)	Foreign banks not in EU subtotal (without adjustments)	Eliminations and adjustments
	a	b	1=a+b; 1=2+3+4+5	2	3	4	5
<b>Profit after income tax for the year from continued and discontinued operations</b>	<b>1,076,140</b>	<b>-</b>	<b>1,076,140</b>	<b>329,404</b>	<b>377,840</b>	<b>352,890</b>	<b>16,006</b>
<b>Profit after income tax for the year from discontinued operations</b>	<b>19,756</b>	<b>(19,756)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Consolidated adjusted profit after income tax for the year from continued operations</b>	<b>1,056,384</b>	<b>19,756</b>	<b>1,076,140</b>	<b>329,404</b>	<b>377,840</b>	<b>352,890</b>	<b>16,006</b>
<b>Profit before income tax</b>	<b>1,309,824</b>	<b>77,059</b>	<b>1,386,883</b>	<b>444,289</b>	<b>451,825</b>	<b>474,758</b>	<b>16,011</b>
<b>Adjusted operating profit</b>	<b>1,473,088</b>	<b>81,958</b>	<b>1,555,046</b>	<b>506,499</b>	<b>484,669</b>	<b>556,876</b>	<b>7,002</b>
<b>Adjusted total income</b>	<b>2,685,862</b>	<b>(42,287)</b>	<b>2,643,575</b>	<b>1,011,558</b>	<b>800,524</b>	<b>836,445</b>	<b>(4,952)</b>
Adjusted net interest income	1,745,340	37,264	1,782,604	606,919	590,060	586,644	(1,019)
Adjusted net profit							
from fees and commissions	842,655	(297,024)	545,631	266,889	169,474	110,547	(1,279)
Adjusted other net non-interest income	97,867	217,473	315,340	137,750	40,990	139,254	(2,654)
<b>Adjusted other administrative expenses</b>	<b>(1,212,774)</b>	<b>124,245</b>	<b>(1,088,529)</b>	<b>(505,059)</b>	<b>(315,855)</b>	<b>(279,569)</b>	<b>11,954</b>
Personnel expenses	(550,175)	(14,199)	(564,374)	(239,952)	(164,036)	(161,276)	890
Depreciation and amortization	(134,293)	15,665	(118,628)	(65,943)	(25,781)	(26,480)	(424)
Other general expenses	(528,306)	122,779	(405,527)	(199,164)	(126,038)	(91,813)	11,488
<b>Gains from derecognition of financial assets at amortized cost</b>	<b>(14,409)</b>	<b>84</b>	<b>(14,325)</b>	<b>(10,717)</b>	<b>2,982</b>	<b>(6,586)</b>	<b>(4)</b>
<b>Modification loss</b>	<b>(13,193)</b>	<b>-</b>	<b>(13,193)</b>	<b>(10,891)</b>	<b>(7)</b>	<b>(2,294)</b>	<b>(1)</b>
<b>Total risk costs</b>	<b>(135,662)</b>	<b>(4,983)</b>	<b>(140,645)</b>	<b>(40,602)</b>	<b>(35,819)</b>	<b>(73,238)</b>	<b>9,014</b>
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	(109,142)	37,128	(72,014)	13,439	(24,332)	(61,700)	579
Goodwill impairment	-	-	-	-	-	-	-
Other impairment (adjustment)	(26,520)	(42,111)	(68,631)	(54,041)	(11,487)	(11,538)	8,435
from this: adjusted impairment under IAS 36	(9,056)	1,745	(7,311)	(7,013)	159	(8)	(449)
<b>Income tax</b>	<b>(253,440)</b>	<b>(57,303)</b>	<b>(310,743)</b>	<b>(114,885)</b>	<b>(73,985)</b>	<b>(121,868)</b>	<b>(5)</b>
<b>Total Assets</b>	<b>43,419,128</b>	<b>-</b>	<b>43,419,128</b>	<b>21,069,530</b>	<b>17,566,160</b>	<b>10,574,190</b>	<b>(5,790,752)</b>
<b>Total Liabilities</b>	<b>38,299,115</b>	<b>-</b>	<b>38,299,115</b>	<b>17,428,696</b>	<b>15,253,492</b>	<b>9,113,844</b>	<b>(3,496,917)</b>

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below [continued]:

As at 31 December 2024 [continued]

Main components of the consolidated statement of profit or loss in HUF million [continued]	Hungarian segment and other foreign subsidiaries not reported in "Foreign bank segment" subtotal (without adjustments) 2=6+...+9	OTP CORE (Hungary)  6	Merkantil Group (Hungary)  7	Asset Management subsidiaries  8	Other subsidiaries  9
<b>Consolidated adjusted profit after income tax for the year</b>	<b>329,404</b>	<b>270,386</b>	<b>10,841</b>	<b>24,747</b>	<b>23,430</b>
Profit before income tax	444,289	374,636	14,569	27,361	27,723
Adjusted operating profit	506,499	434,843	11,794	27,296	32,566
Adjusted total income	1,011,558	877,922	27,237	34,103	72,296
Adjusted net interest income	606,919	578,001	24,052	82	4,784
Adjusted net profit					
from fees and commissions	266,889	219,505	669	31,491	15,224
Adjusted other net non-interest income	137,750	80,416	2,516	2,530	52,288
Adjusted other administrative expenses	<b>(505,059)</b>	<b>(443,079)</b>	<b>(15,443)</b>	<b>(6,807)</b>	<b>(39,730)</b>
Personnel expenses	(239,952)	(212,184)	(7,883)	(4,373)	(15,512)
Depreciation and amortization	(65,943)	(58,437)	(2,199)	(157)	(5,150)
Other general expenses	(199,164)	(172,458)	(5,361)	(2,277)	(19,068)
Gains from derecognition of financial assets at amortized cost	<b>(10,717)</b>	<b>(10,972)</b>	<b>255</b>	-	-
Modification loss	<b>(10,891)</b>	<b>(10,367)</b>	<b>(524)</b>	-	-
Total risk costs	<b>(40,602)</b>	<b>(38,868)</b>	<b>3,044</b>	<b>65</b>	<b>(4,843)</b>
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	13,439	10,805	3,067	13	(446)
Goodwill impairment	-	-	-	-	-
Other impairment (adjustment)	(54,041)	(49,673)	(23)	52	(4,397)
from this: adjusted impairment under IAS 36	(7,013)	(5,161)	-	(7)	(1,845)
<b>Income tax</b>	<b>(114,885)</b>	<b>(104,250)</b>	<b>(3,728)</b>	<b>(2,614)</b>	<b>(4,293)</b>
<b>Total Assets</b>	<b>21,069,530</b>	<b>19,288,046</b>	<b>1,009,625</b>	<b>46,117</b>	<b>725,742</b>
<b>Total Liabilities</b>	<b>17,428,696</b>	<b>16,234,215</b>	<b>943,022</b>	<b>15,261</b>	<b>236,198</b>

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below [continued]:

As at 31 December 2024 [continued]

Main components of the consolidated statement of profit or loss in HUF million [continued]	Foreign banks in EU subtotal (without adjustments) 3=10+...+13	DSK Bank AD (Bulgaria) 10	OTP banka d.d. (Croatia) 11	SKB Banka and Nova KBM d.d. (Slovenia) 12	OTP Bank Romania S.A. (Romania) 13
<b>Consolidated adjusted profit after income tax for the year</b>	<b>377,840</b>	<b>200,764</b>	<b>61,743</b>	<b>113,283</b>	<b>2,050</b>
Profit before income tax	451,825	234,156	75,418	137,571	4,680
Adjusted operating profit	484,669	255,204	73,593	146,283	9,589
Adjusted total income	800,524	375,365	138,875	252,418	33,866
Adjusted net interest income	590,060	267,411	105,300	190,303	27,046
Adjusted net profit					
from fees and commissions	169,474	83,724	28,923	53,756	3,071
Adjusted other net non-interest income	40,990	24,230	4,652	8,359	3,749
Adjusted other administrative expenses	(315,855)	(120,161)	(65,282)	(106,135)	(24,277)
Personnel expenses	(164,036)	(58,893)	(34,888)	(56,259)	(13,996)
Depreciation and amortization	(25,781)	(10,672)	(5,845)	(7,580)	(1,684)
Other general expenses	(126,038)	(50,596)	(24,549)	(42,296)	(8,597)
Gains from derecognition of financial assets at amortized cost	2,982	585	3,642	(1,329)	84
Modification loss	(7)	-	-	(7)	-
Total risk costs	(35,819)	(21,633)	(1,817)	(7,376)	(4,993)
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	(24,332)	(18,600)	6,793	(7,728)	(4,797)
Goodwill impairment	-	-	-	-	-
Other impairment (adjustment)	(11,487)	(3,033)	(8,610)	352	(196)
from this: adjusted impairment under IAS 36	159	165	(6)	-	-
Income tax	(73,985)	(33,392)	(13,675)	(24,288)	(2,630)
<b>Total Assets</b>	<b>17,566,160</b>	<b>7,674,660</b>	<b>3,784,532</b>	<b>6,106,968</b>	<b>-</b>
<b>Total Liabilities</b>	<b>15,253,492</b>	<b>6,623,233</b>	<b>3,300,816</b>	<b>5,329,443</b>	<b>-</b>

**NOTE 48: SEGMENT REPORTING BY BUSINESS AND GEOGRAPHICAL SEGMENTS (in HUF mn) [continued]**

Information regarding the Group's reportable segments is presented below [continued]:

As at 31 December 2024 [continued]

Main components of the consolidated statement of profit or loss in HUF million [continued]	Foreign banks not in EU subtotal (without adjustments) 4=14+...+20	OTP banka Srbija a.d. (Serbia) 14	OTP Bank JSC (Ukraine) 15	JSC "OTP Bank" (Russia) and Touch Bank 16	Crnogorska komercijalna banka a.d. (Montenegro) 17	Banka OTP Albania SHA (Albania) 18	OTP Bank S.A. (Moldova) 19	JSCMB Ipoteka Bank (Uzbekistan) 20
<b>Consolidated adjusted profit after income tax for the year</b>	<b>352,890</b>	<b>66,496</b>	<b>41,179</b>	<b>136,946</b>	<b>24,195</b>	<b>19,687</b>	<b>11,493</b>	<b>52,894</b>
Profit before income tax	474,758	77,469	72,842	195,535	28,580	23,450	13,039	63,843
Adjusted operating profit	556,876	95,477	68,415	252,216	27,170	23,146	12,414	78,038
Adjusted total income	836,445	153,565	101,605	343,619	45,661	40,048	26,179	125,768
Adjusted net interest income	586,644	116,621	89,894	187,070	35,460	33,531	15,353	108,715
Adjusted net profit								
from fees and commissions	110,547	21,726	7,769	55,095	9,729	4,243	2,483	9,502
Adjusted other net non-interest income	139,254	15,218	3,942	101,454	472	2,274	8,343	7,551
Adjusted other administrative expenses	(279,569)	(58,088)	(33,190)	(91,403)	(18,491)	(16,902)	(13,765)	(47,730)
Personnel expenses	(161,276)	(29,216)	(19,960)	(55,292)	(8,668)	(6,962)	(8,007)	(33,171)
Depreciation and amortization	(26,480)	(4,941)	(2,808)	(8,505)	(2,193)	(2,152)	(1,417)	(4,464)
Other general expenses	(91,813)	(23,931)	(10,422)	(27,606)	(7,630)	(7,788)	(4,341)	(10,095)
Gains from derecognition of financial assets at amortized cost	(6,586)	(84)	204	283	(29)	(1,328)	(228)	(5,404)
Modification loss	(2,294)	(2,164)	(134)	-	4	-	-	-
Total risk costs	(73,238)	(15,760)	4,357	(56,964)	1,435	1,632	853	(8,791)
Adjusted loss allowance on financial assets and liabilities (without the effect of revaluation of FX)	(61,700)	(13,615)	9,052	(55,172)	1,973	1,328	802	(6,068)
Goodwill impairment	-	-	-	-	-	-	-	-
Other impairment (adjustment)	(11,538)	(2,145)	(4,695)	(1,792)	(538)	304	51	(2,723)
from this: adjusted impairment under IAS 36	(8)	(36)	-	-	-	-	28	-
<b>Income tax</b>	<b>(121,868)</b>	<b>(10,973)</b>	<b>(31,663)</b>	<b>(58,589)</b>	<b>(4,385)</b>	<b>(3,763)</b>	<b>(1,546)</b>	<b>(10,949)</b>
<b>Total Assets</b>	<b>10,574,190</b>	<b>3,483,775</b>	<b>1,186,801</b>	<b>2,370,967</b>	<b>776,370</b>	<b>791,495</b>	<b>455,246</b>	<b>1,509,536</b>
<b>Total Liabilities</b>	<b>9,113,844</b>	<b>3,047,166</b>	<b>981,096</b>	<b>2,072,180</b>	<b>654,980</b>	<b>676,846</b>	<b>386,192</b>	<b>1,295,384</b>

**NOTE 49: DISCONTINUED OPERATIONS (in HUF mn)**

On 9 February 2024 OTP Bank announced the signing of the share sale and purchase agreement to sell its Romanian operation. As for the consolidated profit or loss, the Romanian contribution for the end of year 2024 was shown separately from the result of continuing operation, on the "Net gain from discontinued operations" line, that is the particular profit or loss lines in the 'continuing operations' section didn't incorporate the contribution from the Romanian subsidiaries.

The result from discontinued operations for the year 2024 was HUF 19,756 million, which was allocated in the consolidated profit or loss under the same line as previous year "Net gain / (loss) from discontinued operations" and consisted of:

- The contribution of the Romanian subsidiaries to the Group's result amounted to HUF 8,871 million.
- The combined effect of the gain on sale, the reclassification of exchange differences to profit or loss and other income items recognized in the Group's books amounted to HUF 10,885 million.

The negative impact of the translation difference removed from the consolidated statement of comprehensive income was HUF 18,166 million.

The selling price is EUR 347.5 million which is smaller than the net asset value of the to be sold subsidiaries recognized in the consolidated accounts, accordingly the transaction resulted in a negative profit or loss impact of HUF 55.9 billion (before tax) on consolidated level, which has already been booked in the fourth quarter of 2023. The Romanian segment of the Group which was classified as discontinued operation includes the following companies: OTP Bank Romania S.A., OTP Asset Management SAI S.A., OTP Leasing Romania IFN S.A., OTP Factoring SRL, SC Favo Consultanta SRL, SC Aloha Buzz SRL, SC Tezaur Cont SRL.

For the current year OTP Group did not present discontinued operation in the Consolidated Financial Statements. The results of discontinued operations, which have been separated on line "Net Gain from discontinued operations" in the consolidated statement of profit or loss for year 2024, were as follows:

	<b>Year ended 31 December 2024</b>
Interest income calculated using the effective interest method	54,388
Income similar to interest income	<u>4,055</u>
<b>Interest income and income similar to interest income</b>	<b>58,443</b>
<b>Interest expense</b>	<b><u>(24,810)</u></b>
<b>NET INTEREST INCOME</b>	<b>33,633</b>
Loss allowance on loans, placements, amounts due from banks and on repo receivables	(3,789)
Release of loss allowance on securities at fair value through other comprehensive income and on securities at amortized cost	72
Provision for commitments and guarantees given	<u>(1,012)</u>
<b>Risk cost total</b>	<b><u>(4,729)</u></b>
<b>NET INTEREST INCOME AFTER RISK COST</b>	<b>28,904</b>
<b>Gain from derecognition of financial assets at amortized cost</b>	<b>85</b>
Income from fees and commissions	9,800
Expense from fees and commissions	<u>(2,977)</u>
<b>Net profit from fees and commissions</b>	<b>6,823</b>
Foreign exchange result, net	(1,705)
Loss on securities, net	(12)
Fair value adjustment on financial instruments measured at fair value through profit or loss	36
Net results on derivative instruments and hedge relationships	1,811
Profit from associates	124
Other operating income	370
Other operating expenses	<u>(570)</u>
<b>Net operating income</b>	<b>54</b>
Personnel expenses	(14,133)
Depreciation and amortization	(2,676)
Other general expenses	<u>(8,867)</u>
<b>Other administrative expenses</b>	<b><u>(25,676)</u></b>
<b>PROFIT BEFORE INCOME TAX</b>	<b>10,190</b>
Income tax expense	<u>(1,319)</u>
<b>PROFIT AFTER INCOME TAX FOR THE PERIOD</b>	<b><u>8,871</u></b>

**NOTE 50: SIGNIFICANT EVENTS DURING THE YEAR ENDED 31 DECEMBER 2025****1) Term Note Program**

See details in Note 21.

**2) Significant regulatory changes in Hungary**

About the regulatory changes of windfall tax, interest rate cap, freeze on retail banking fees, cash withdrawals, family support schemes and economic stimulation measures, capital regulation please see details in Note 4.

**3) Contribution to the renovation of the Royal Castle of Gödöllő with a donation**

On 13 October 2025 OTP Bank Plc. has signed a tripartite agreement with the Government of Hungary and with the Foundation for the Hungarian University of Agriculture and Life Sciences. Based on the tripartite agreement, OTP Bank Plc provides a lump-sum, target-specific, nonrefundable, public interest grant as a donation to the Foundation for the Hungarian University of Agriculture and Life Sciences in the amount of HUF 20 billion for the complete renovation of the Royal Castle of Gödöllő and some of its associated properties (Park and Chapel).

The Royal Castle of Gödöllő and some of its properties will be renovated with the joint and same amount of support of the Government of Hungary and OTP Bank Plc, in total of HUF 40 billion undertaken by the sponsors. The renovation of the Royal Castle of Gödöllő and some of its properties falls within the scope of OTP Bank Plc's corporate social responsibility activities.

**4) Acquisition of asset management company in Slovenia**

The two wholly-owned subsidiaries of OTP Bank Plc., OTP Fund Management Ltd. and OTP banka d.d. (Slovenia) signed a sale and purchase agreement in Slovenia on September 19, 2025, according to which they will jointly acquire a 100% stake in the fund management company Primorski skladi d.o.o., Koper from the Dutch parent company Elektronček Group B.V. (EGBV). Under the transaction, OTP Fund Management Ltd. will acquire a 75% stake in the target company, while OTP banka d.d. (Slovenia) will acquire a 25% stake.

The transaction is expected to be financially closed in the first quarter of 2026, subject to obtaining the necessary regulatory approvals.

**5) War related risks**

In 2022 Russia launched a still ongoing war against Ukraine. Many countries, as well as the European Union imposed sanctions due to the armed conflict on Russia and Russian businesses and citizens. Russia responded to these sanctions with similar measures.

Ongoing wars and the international sanctions influence the business and economic activities significantly all around the world. There are a number of factors associated with the Russian-Ukrainian war and other armed conflicts as well as the international sanctions and their impact on global economies that could have a material adverse effect on (among other things) the profitability, capital and liquidity of financial institutions such as the OTP Group.

Wars and international sanctions cause significant economic damage to the affected parties and in addition they cause disruptions in the global economic processes, and they have negative impact – interalia – on energy and grain markets, the global transport routes and international trade as well as on tourism.

OTP Group continues to monitor war situations closely. The OTP Group's ability to conduct business may be adversely affected by disruptions and restrictions to its infrastructure, business processes and technology services. This may cause significant customer detriment, costs to reimburse losses incurred by the OTP Group's customers, and reputational damage.

Furthermore, the OTP Group relies on models to support a broad range of business and risk management activities, including informing business decisions and strategies, measuring and limiting risk, valuing exposures, conducting stress testing and assessing capital adequacy. Models are, by their nature, imperfect and incomplete representations of reality because they rely on assumptions and inputs, and as such assumptions may later potentially prove to be incorrect, this can affect the accuracy of their outputs. This may be exacerbated when dealing with unprecedented scenarios, such as the Russian-Ukrainian armed conflict and the international sanctions, due to the lack of reliable historical reference points and data.

Any and all such events mentioned above could have a material adverse effect on the OTP Group's business, financial condition, results of operations, prospects, liquidity, capital position and credit ratings, as well as on the OTP Group's customers, employees and suppliers.

**NOTE 51: POST BALANCE SHEET EVENTS****Summary of economic policy measures made and other relevant regulatory changes as post-balance sheet events**

On 28 February 2026, the United States and Israel carried out coordinated military strikes against Iran, in response to which Iran launched retaliatory missile and drone attacks against Israel and U.S. military facilities along the Persian Gulf. As a result, among other effects, global energy prices and foreign exchange rates became more volatile.

**Hungary**

- The Monetary Council, in its decision of 13 January 2026, reduced the reserve requirement from 8% to 6%. The new requirement is to be applied by credit institutions starting from the reserve maintenance period commencing in March 2026.
- OTP Bank Plc. issued unsecured Senior Preferred notes on 3 February 2026 as value date in the aggregate nominal amount of EUR 500 million. The coupon rate is 3.625% per annum, with a maturity structure of 6NC5. The notes are rated 'BBB' by S&P Global Ratings Europe Limited and 'BBB+' by Scope Ratings GmbH. The notes are listed on the Luxembourg Stock Exchange.
- OTP Mortgage Bank on 12 February 2026 it has issued mortgage notes in aggregate nominal amount of EUR 500 million. The notes are rated 'A1' by Moody's Investor Service rating agency, the securities are listed on the Luxembourg Stock Exchange.
- According to the preliminary data published by the Central Statistical Office on 30 January 2026, the performance of the Hungarian economy grew by 0.2% q-o-q in the fourth quarter. Annual growth in 2025 reached 0.4%, 0.3% based on seasonally and calendar adjusted and balanced data. Average annual inflation in 2025 amounted to 4.4%.
- At its interest rate decision meeting on 24 February 2026, the National Bank of Hungary reduced the policy rate by 25bps to 6.25%.
- As at 24 February 2026, the United States abolished the legally contested "reciprocal" tariffs targeting the European Union and replaced them with a uniform, country neutral 10% temporary ad valorem import surcharge for a period of 150 days, while sector specific tariffs (e.g. automotive and steel) remained unchanged. The amendment did not materially affect the tariff rates applied to goods imported from Hungary or the European Union into the United States

**Bulgaria**

- On 1 January 2026, Bulgaria joined the euro area, officially becoming the 21st member state after the European Union approved the accession process and the fulfilment of the convergence criteria.

**Slovenia**

- On 27 February 2026, Moody's Ratings upgraded Slovenia's ratings to A2 and changed outlook to stable.

**Serbia**

- On 27 February 2026, Moody's Ratings changed Serbia's outlook to stable from positive, and affirmed Ba2 ratings.

**Ukraine**

- On 29 January 2026, the National Bank of Ukraine reduced the base rate by 50 bps to 15%.

**Montenegro**

- On 27 February 2026, S&P Global Ratings revised its outlook on the long-term foreign and local currency sovereign ratings on Montenegro to positive from stable.

**Russia**

- On 13 February 2026, the Russian central bank reduced the base rate by 50 bps to 15.5%.

## **ANNEX TO SUSTAINABILITY REPORT**

Responsible banking progress statement for PRB signatories – OTP Bank 2025<sup>1</sup>

Principle 1 Alignment	Principle 2 Impact & Target Setting	Principle 3 Clients & Customers
<p><b>OTP Group's commitment to sustainability</b> OTP Group is committed to enabling the transition to a sustainable future and contributing to the positive development of society. The Group aspires to take a leading regional role in financing a fair and gradual transition to a low-carbon economy, offering responsible solutions that support climate transition, social value creation and long-term economic resilience.</p> <p>Stability and sustainability are fundamental pillars of OTP Group's corporate strategy. The Group's sustainability and corporate responsibility framework defines its principles, objectives and priorities across environmental, social and governance (ESG) dimensions, with increasing emphasis on climate transition, transparent reporting and stakeholder engagement.</p> <p>OTP Group's long-term commitment to sustainability, transparency and ethical operations is reflected in stable management, responsible governance and compliance with evolving regulatory expectations, including CSRD and ESRS requirements. The Group aims to provide responsible and fair financial services tailored to customer needs, while fostering trust-based cooperation with stakeholders and continuously reducing its environmental footprint.</p> <p>The sustainability strategy of OTP Group is built on three pillars: <b>responsible service provider, responsible employer and responsible social actor</b>, supporting sustainable finance, employee wellbeing and active contribution to society.</p>	<p><b>OTP Group's sustainability initiatives</b> OTP Bank's PRB impact analysis identified climate change mitigation and financial health &amp; inclusion as target setting areas under PRB. In 2024, OTP Group completed its first ESRS-aligned Double Materiality Assessment (DMA), <b>which was revised and updated with a new methodology in 2025</b>. The assessment utilized the UNEP FI Portfolio Impact Analysis Tool. The DMA identified <b>climate change</b> (mitigation and adaptation) and <b>access to quality information and access to financial products and services</b> as material topics for OTP Group. Accordingly, climate change mitigation and financial health&amp;inclusion remain priority areas for PRB target setting.</p> <p>Building on the 2024 DMA, portfolio-level analysis in 2025 helped identify customer segments and regions where the Group's core banking activities can deliver the greatest positive impact, particularly among retail customers, micro-entrepreneurs and SMEs, and in less developed regions of Central and Eastern Europe and Central Asia.</p> <p>Climate change mitigation and adaptation remain priority areas due to the material exposure of the Group's portfolios to climate-related risks and transition impacts. In 2024, OTP Group established a baseline by assessing its activities and portfolio against the long-term climate objectives of the Paris Agreement. In 2025, the Group further advanced its climate transition planning, focusing on Paris-aligned targets, sustainable financing and the integration of climate considerations into operations and financing.</p> <p><i>Climate Change</i> OTP Group has defined the following primary climate-related targets to support the transition to a low-carbon economy, addressing both <b>financed emissions</b> and its <b>own operational footprint</b>.</p> <ol style="list-style-type: none"> <li><b>Green lending target</b> <ul style="list-style-type: none"> <li>OTP Group set a target to <b>build a green loan portfolio of HUF 1,500 billion by 2025</b>.</li> <li>This <b>target was achieved and exceeded in 2025</b>, with the <b>green loan portfolio reaching HUF 1,697 billion</b>.</li> <li>Building on this achievement, OTP Group aims to further scale its green lending activities and reach a <b>green loan portfolio of approximately HUF 2,123 billion by 2028</b>, representing a planned compound <b>annual growth rate of around 12% between 2025 and 2028</b>, in line with the Group's 2026–2028 Sustainability Strategy.</li> </ul> </li> <li><b>Portfolio-level GHG emission reduction target</b> <ul style="list-style-type: none"> <li>OTP Group has established a <b>portfolio-specific financed GHG emission reduction target (Scope 3)</b> aligned with the long-term objectives of the <b>Paris Agreement</b>, informed by <b>IEA Net Zero 2050 scenarios</b> and relevant <b>national decarbonisation pathways</b> across its operating markets.</li> <li>The Group aims to achieve a <b>29.8% relative reduction in financed Scope 1-2 emissions by 2030</b>, compared to the <b>2023 base year</b>, with corresponding absolute emission reduction trajectories derived from these relative targets.</li> </ul> </li> </ol>	<p><b>Safety, Security, and Ethical Operations</b> At OTP Group, safe and secure operations are of utmost importance. We continuously assess and manage risks that could impact our operations and implement robust measures to prevent and detect fraud.</p> <p>Product development and service accessibility strictly adhere to ethical standards and consumer protection regulations. Our goal is to provide modern, high-quality, and fair services that meet customer needs. We are committed to supporting customers' financial wellbeing by offering products aligned with their real needs and financial capabilities.</p> <p>Given the complexity of financial products and services, clear and effective communication is essential. OTP Group therefore prioritizes transparent, understandable and timely communication to enable customers to make informed financial decisions.</p> <p><b>Green Lending</b> OTP Group actively integrates green lending into its business strategy, aiming to ensure that any client from any sector can access loans under green conditions, provided they have a green or sustainable goal. The development and maturity of green lending practices vary by country, industry, and customer segment. The key sectors targeted by the Group's green portfolio include:</p> <ul style="list-style-type: none"> <li><b>Energy:</b> financing renewable energy production, distribution, storage, and related loan purposes;</li> <li><b>Real estate:</b> supporting the construction and purchase of green properties, as well as financing building renovations that lead to significant energy efficiency improvements;</li> <li><b>Transportation:</b> promoting electro-mobility initiatives.</li> </ul>

<sup>1</sup> This Progress Statement has been prepared following the guidance provided by the [Principles for Responsible Banking \(PRB\)](#)

Principle 1 Alignment	Principle 2 Impact & Target Setting	Principle 3 Clients & Customers
<p><b>Alignment with frameworks and goals</b> OTP Group's sustainability approach is aligned with key international and European frameworks, including the UNEP FI Principles for Responsible Banking (PRB), the United Nations Sustainable Development Goals (SDGs), the Paris Agreement, and the European Union's Green Deal, while also reflecting the evolving regulatory landscape, including CSRD and ESRS requirements.</p> <p>The Group regularly assesses its activities and portfolio to ensure consistency with the long-term climate objectives of the Paris Agreement. This includes <b>setting and monitoring Paris-aligned climate transition targets</b>, expanding sustainable and green financing, and reducing the environmental impact of both its own operations and financed activities. Through structured governance, enhanced ESG disclosures and continuous alignment with international frameworks, OTP Group supports sustainable growth and social progress while contributing to the transition to a low-carbon economy, long-term economic stability and societal value creation.</p>	<ul style="list-style-type: none"> <li>Progress is monitored at portfolio level and integrated into lending, risk management and transition-financing decisions.</li> </ul> <p><b>3. Decarbonisation of own operations</b></p> <ul style="list-style-type: none"> <li>OTP Group is committed to <b>reducing the GHG emissions of its own operations (Scope 1 and Scope 2)</b>, primarily through energy-efficiency measures, optimization of buildings and branches and gradual decarbonisation of the vehicle fleet.</li> <li>The Group has set <b>quantitative emission-reduction targets for own operations towards 2030</b>, supporting its longer-term ambition to minimise its direct environmental footprint and contribute to climate change mitigation.</li> </ul> <p>OTP Group has established an initial, high-level approach to managing the transition towards a lower-carbon economy, supported by financed emissions measurement, green and transition finance initiatives and the integration of climate considerations into portfolio management and governance. Building on this foundation, the Group is strengthening its transition planning by consolidating actions into a more structured framework and clarifying short- and long-term objectives, responsibilities and milestones.</p> <p><i>Financial Health&amp;Inclusion</i> OTP Group recognises the importance of supporting the financial health of its retail customer base and already monitors a broad set of portfolio-level indicators related to retail lending, deposits and credit quality across markets and customer segments. Building on these existing data sources, the Group plans to further enhance its approach by developing a more structured framework for assessing customer financial health, leveraging established industry methodologies and, where appropriate, cooperation with credible external partners. This enhanced approach is intended to support a baseline assessment of customer financial health, enable the identification of potentially vulnerable customer groups, and progressively introduce outcome-based indicators to better monitor changes in customers' financial well-being over time and to inform responsible product development and engagement.</p> <p>OTP Group prioritizes <b>responsible marketing, digital accessibility and financial education</b>, ensuring that customers receive clear and accurate information about products and services. Key initiatives include:</p> <ul style="list-style-type: none"> <li>expanding <b>digital accessibility</b> to financial products,</li> <li>improving <b>customer financial literacy</b>,</li> <li>strengthening <b>youth finance</b> resilience,</li> <li><b>improving access to in-person banking services in underserved communities</b>,</li> <li>supporting disadvantaged groups through initiatives such as the <b>Social Lab</b>.</li> </ul> <p><b>1. Digital Accessibility</b> OTP Bank is committed to improving digital accessibility by aligning its digital channels with WCAG 2.1 A-level requirements, while continuously reviewing and enhancing accessibility across its website, InternetBank, MobileBank, ATMs and POS terminals. The Bank supports this commitment through inclusive design principles, regular employee training, the involvement of affected users and representative organizations, and the progressive remediation of identified accessibility gaps.</p>	<p>By focusing on these sectors, OTP Group aims to support the transition to a low-carbon economy while fostering sustainable development through responsible financing.</p> <p><b>Enhancing client engagement and retail product offerings towards leading practice</b> Building on its green lending framework, OTP Group is strengthening its engagement with corporate clients operating in high-impact sectors. For selected clients in carbon-intensive and transition-relevant industries, the Group has introduced a structured <b>Client Climate Engagement Assessment (CCEA)</b>, to systematically evaluate clients' climate mitigation commitments and transition efforts. This approach enables more targeted dialogue on decarbonisation, supports advisory discussions on transition planning and allows for enhanced scrutiny where progress is assessed as insufficient. The engagement framework is complemented by clearly defined limits and conditional financing practices for certain activities, reinforcing responsible lending decisions.</p> <p>In parallel, OTP Group continues to develop its retail <b>green product offering</b> to more actively encourage sustainable consumer behaviour while supporting customers' financial health. The Group has established and continuously refines a <b>green retail lending portfolio, including preferential loan products for energy-efficient home purchases, construction and renovations</b>, as well as for green mobility solutions in selected markets. These products are aligned with internally defined green criteria and are supported by transparent eligibility requirements and monitoring mechanisms. The definition of green retail products and their contribution to climate objectives is regularly reviewed and approved through the Group's ESG governance processes.</p> <p>Through the combination of structured corporate engagement in high-impact sectors and the further development of accessible, purpose-driven retail green products, OTP Group aims to enhance its contribution to decarbonisation while supporting sustainable consumer choices and maintaining a strong focus on customers' financial well-being.</p>

Principle 1 Alignment	Principle 2 Impact & Target Setting	Principle 3 Clients & Customers
	<p><b>2. Financial literacy</b> Bankoljtudatosan.hu is a <b>financial education platform</b> launched in 2025 that provides clear and accessible content to support informed financial decision-making. The platform is continuously expanded and help embed financial inclusion, education and resilience into OTP Group's everyday banking services.</p> <p><b>3. Youth finance resilience</b> OTP Bank aims to maintain and further develop the <b>OTP Junior</b> account and <b>mobile banking application for customers aged 7–24</b>, with a continued focus on spending awareness, savings and financial education, supported by fee-free basic banking services. The Group targets sustained active engagement, building on the current baseline where <b>over 60% of young customers regularly use the mobile banking platform</b>, to strengthen long-term financial resilience and literacy.</p> <p><b>4. OTP Mozgó bankfiók</b> OTP Bank aims to ensure continuous access to essential in-person retail banking services in underserved and rural settlements through the OTP Mozgó Bankfiók service, operating on a regular and predictable schedule where no permanent branch is available. <b>The service currently reaches 24 settlements and the objective for the current year is to maintain this level of coverage.</b> Service coverage, locations and customer needs are reviewed annually, allowing the service model to be flexibly adjusted to changing local demand rather than setting fixed long-term quantitative targets.</p> <p><b>5. Social Lab</b> OTP Group strengthens the financial resilience and inclusion of underserved groups —particularly social enterprises — through practical, digitally enabled banking solutions, market access support and targeted financial education embedded in its core services. OTP Group aims to support the financial sustainability of <b>social enterprises by featuring 12 social enterprises by 2028 on the fizz.hu marketplace under 0% commission conditions and integrating at least 1 social enterprise by 2026 into the OTP Bank Discount Program</b>, complemented by targeted financial education and professional support.</p>	
<p>References and other relevant links: <a href="https://www.otpgroup.info/sustainability/strategy">https://www.otpgroup.info/sustainability/strategy</a> Integrated Annual Report 2025 (page 89; 91; 93; 94; 96)</p>	<p>References and other relevant links: <a href="https://www.otpgroup.info/sustainability/strategy">https://www.otpgroup.info/sustainability/strategy</a> <a href="https://www.otpgroup.info/sustainability/green-transition-sustainable-finance">https://www.otpgroup.info/sustainability/green-transition-sustainable-finance</a> <a href="https://www.otpgroup.info/sustainability/fair-customer-relations">https://www.otpgroup.info/sustainability/fair-customer-relations</a> <a href="https://www.otpbank.hu/portal/hu/junior">https://www.otpbank.hu/portal/hu/junior</a> <a href="https://www.otpbank.hu/portal/hu/bankoljtudatosan">https://www.otpbank.hu/portal/hu/bankoljtudatosan</a> <a href="https://www.otpbank.hu/portal/hu/kapcsolat/mozgo-bankfiok">https://www.otpbank.hu/portal/hu/kapcsolat/mozgo-bankfiok</a> <a href="https://www.otpgroup.info/static/sw/file/Group_remuneration_guidelines_20250425.pdf">https://www.otpgroup.info/static/sw/file/Group_remuneration_guidelines_20250425.pdf</a> <a href="https://www.otpgroup.info/static/sw/file/OTP_Group_Environmental_and_Social_Risk_Management_Framework.pdf">https://www.otpgroup.info/static/sw/file/OTP_Group_Environmental_and_Social_Risk_Management_Framework.pdf</a> Integrated Annual Report 2025 (page 104; 106; 120; 150, 275)</p>	<p>References and other relevant links: <a href="https://www.otpgroup.info/sustainability/responsible-service-provider">https://www.otpgroup.info/sustainability/responsible-service-provider</a> <a href="https://www.otpgroup.info/sustainability/fair-customer-relations">https://www.otpgroup.info/sustainability/fair-customer-relations</a> Integrated Annual Report 2025 (page 104; 275)</p>

Principle 4 Stakeholders	Principle 5 Governance & Culture	Principle 6 Transparency & Accountability
<p>We continually engage with a wide range of stakeholders, including shareholders, customers, employees, regulatory authorities, business partners, NGOs, employee representatives, and external ESG expert groups. These engagements support commercial, informational and policy-related objectives and contribute to the identification and management of material topics, including climate change mitigation, environmental risks, financial inclusion and responsible business conduct.</p> <p>As part of our DMA, OTP Group consults affected stakeholders or their representatives to better understand the actual and potential impacts, risks and opportunities associated with its business activities. Stakeholder inputs are assessed together with due diligence processes, regulatory expectations and internal analyses and are reflected in the regular update of the materiality assessment, sustainability reporting and selected strategic and operational decisions</p> <p>Building on this framework, OTP Group is further refining its stakeholder engagement approach by <b>systematically incorporating external perspectives</b>, including civil society organizations and professional expert groups, particularly in areas where the Group's financing activities are associated with higher environmental or social impacts. These engagements support the development and refinement of sector-specific approaches, such as climate-related client engagement in high-impact sectors and the calibration of responsible financing practices.</p> <p>In parallel, OTP Group actively participates in <b>industry initiatives and regulatory-driven sustainability frameworks</b> relevant to the banking sector, including EU-level taxonomies, transition pathways and supervisory expectations. Through this participation, the Group aims to maintain a consistent and responsible approach to sustainable finance, aligned with its strategic commitments and adapted to the local economic and regulatory context of its core markets.</p>	<p><b>Transparent Operations and Ethical Business Conduct</b> At OTP Group, transparent operations and ethical business conduct are of the highest priority. Our key objectives include ensuring compliance with applicable laws and regulations, mitigating risks, and effectively enforcing business, ethical and internal control frameworks. Adherence to ethical norms and principles not only guarantees legal compliance but also fosters trust, cooperation and fairness across the organization.</p> <p>The corporate culture at OTP Group is defined by long-term thinking, a responsible mindset and a commitment to sustainability. At the same time, OTP Bank remains conscious of its legal obligation to ensure the profitable operation of OTP Bank and OTP Group for the benefit of depositors, shareholders, and investors. Balancing responsibility and profitability is therefore essential and these aspects must interact harmoniously.</p> <p>Across the Group, particular emphasis is placed on transparency, regulatory compliance and the clear definition of internal responsibilities in order to meet a broad range of environmental, social and regulatory expectations.</p> <p><b>ESG Governance</b> OTP Bank's ESG governance framework was established by a decision of the Board of Directors in 2021. The ESG Committee and ESG Sub-Committee operate as standing committees under Organizational and Operational Regulation with clearly defined mandates, responsibilities and reporting lines. This structure ensures that sustainability-related topics are embedded into strategic discussions and decision-making processes at Group level.</p> <p>Sustainability-related incentives for members covered by the Remuneration Policy are linked to the achievement of institutional and individual objectives through a two-tier performance measurement system, evaluated separately on a scale of 0-100%. This approach supports accountability at senior management level and reinforces the integration of ESG considerations into leadership decision-making.</p> <p>In 2023, targeted ESG training was delivered to executive and strategic-level leaders across the Group, with nearly 360 leaders completing a dedicated e-learning program. The training covered ESG fundamentals, legal and regulatory requirements, business and risk management aspects, human resources topics and the importance of avoiding greenwashing.</p> <p>To further advance ESG capabilities, OTP Group aims to <b>expand ESG training to a broader employee base through role-specific programs</b>. These may include advanced modules for functions with higher potential impact, such as corporate relationship managers, credit risk analysts and product development teams, with a focus on transition planning, sector-specific environmental and social risks and the practical application of sustainability criteria in decision-making.</p>	<p>OTP Group publishes its consolidated Sustainability statement, aligned with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) in the 2024 OTP Group Integrated Annual Report.</p> <p>To ensure reliability, the contents of the report have been independently assured by E&amp;Y, confirming adherence to established regulatory standards and the accuracy of the reported sustainability data. In addition, detailed and segmented ESG data is presented in supplemental background materials, in Analyst table.</p> <p>In line with the Principles for Responsible Banking (PRB) requirements, OTP Group remains committed to transparent follow-up on progress against the recommendations outlined in this report. The Group will continue to disclose updates on the implementation of actions and improvements in subsequent reporting cycles and will notify the UNEP FI Secretariat upon publication of its next PRB-relevant report.</p> <p>By aligning its consolidated Sustainability Statement with CSRD and ESRS requirements and subjecting the disclosures to independent external assurance, OTP Group aims to ensure consistency, reliability and comparability of sustainability-related information. The availability of detailed, segmented ESG data in supplemental analyst materials further supports transparency and enables stakeholders to track progress over time.</p>

Principle 4 Stakeholders	Principle 5 Governance & Culture	Principle 6 Transparency & Accountability
<p>References and other relevant links:  <a href="https://www.otpgroup.info/sustainability/strategy">https://www.otpgroup.info/sustainability/strategy</a>                      Y                      Integrated Annual Report 2025 (page 104)</p>	<p>References and other relevant links:  <a href="https://www.otpgroup.info/sustainability/strategy">https://www.otpgroup.info/sustainability/strategy</a>  <a href="https://www.otpgroup.info/static/sw/file/Group_remuneration_guidelines_20250425.pdf">https://www.otpgroup.info/static/sw/file/Group_remuneration_guidelines_20250425.pdf</a>  <a href="https://www.otpgroup.info/static/sw/file/OTP_Group_Environmental_and_Social_Risk_Management_Framework.pdf">https://www.otpgroup.info/static/sw/file/OTP_Group_Environmental_and_Social_Risk_Management_Framework.p</a>  <a href="#">df</a>                      Integrated Annual Report 2025 (page 89; 286)</p>	<p>References and other relevant links:  <a href="https://www.otpgroup.info/sustainability/strategy">https://www.otpgroup.info/sustainability/strategy</a>                      Y                      Integrated Annual Report 2025 (page 350)</p>