

Documents guiding the application of the Code of Ethics of OTP Bank Plc and the OTP Group

I. EXTERNAL DIRECTIVES:

- The International Bill of Human Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) <http://www.ohchr.org/Documents/Publications/FactSheet2Rev.1en.pdf>
- The European Convention on Human Rights https://www.echr.coe.int/documents/d/echr/Convention_ENG
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work <https://www.ilo.org/declaration/lang--en/index.htm>
- UN Guiding Principles on Business and Human Rights https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
- OECD Guidelines for Multinational Enterprises <https://web.archive.oecd.org/2023-06-27/95735-48004323.pdf>
- UN Global Compact <https://unglobalcompact.org/about>
- Modern-day Anti-Slavery Act 2015 https://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf
- UK Anti-Bribery Act 2010 https://www.legislation.gov.uk/ukpga/2010/23/pdfs/ukpga_20100023_en.pdf
- United States Foreign Corrupt Practices Act <https://www.sec.gov/spotlight/fcpa/fcpa-resource-guide.pdf>
- Global principles of the Anti-Corruption Partnership Initiative to end bribery http://www3.weforum.org/docs/WEF_PACI_Global_Principles_for_Counteracting_Corruption.pdf
- Recommendation No. 12/2022 (VIII.11.) of the Hungarian National Bank on the establishment and operation of internal lines of defence, the management and control functions of financial institutions <https://www.mnb.hu/letoltes/12-2022-belso-vedelmi-vonalak-ajanlas.pdf>
- Code of Conduct of the Hungarian Banking Association https://www.bankszovetseg.hu/Content/alapdokumentumok/Magatartasi-Kodex_20151021_Honlapra.pdf
- Investment Services Association Code of Ethics <http://www.bssz.hu/etikai-kodex>
- UN Guiding Principles on the Responsibility of Businesses for Human Rights / United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles on Business and Human Rights UNGP); https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
- Children's rights and business principles: <https://unicef.hu/wp-content/uploads/2014/10/Childrens-Rights-and-Business-Principles.pdf>
- The core conventions of the International Labour Organisation
 - 1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98)

- Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)
 - Abolition of Forced Labour Convention, 1957 (No. 105)
 - Minimum Age Convention, 1973 (No. 138)
 - Worst Forms of Child Labour Convention, 1999 (No. 182)
 - Equal Remuneration Convention, 1951 (No. 100)
 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>
- OECD Guidelines for Multinational Enterprises (human rights chapter)
<http://mneguidelines.oecd.org/guidelines/>
 - UN Global Compact
<https://unglobalcompact.org/what-is-gc/mission/principles>
 - IFC Performance Standards
https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards
 - UN Declaration on the Rights of Indigenous Peoples (UNDRIP)
https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf
 - UN Sustainable Development Goals (SDG)
<https://sdgs.un.org/goals>

II. RELATED LEGISLATION (amendments to the legislation in force)

- Act V of 2013 on the Civil Code
- Act C of 2012 on the Criminal Code
- Act CCXXXVII of 2013 on Credit institutions and financial undertakings,
- Act CXX of 2001 on the Capital Market
- Act CXXXVIII of 2007 on Investment Firms and Commodity Exchange Service Providers and the Rules of the Activities They May Perform
- Act LIV of 2018 on the Protection of Business Secrets
- Act XXV of 2023 - on complaints, notifications of public interest and rules on reporting abuse
- Act LIII of 2017 on the Prevention and Suppression of Money Laundering and Terrorist Financing
- Act LII of 2017 implementing the financial and property restrictive measures imposed by the European Union and the United Nations Security Council
- Act XLIII of 2021 on the Establishment and Operation of a Data Service Background for the Identification of Financial and Other Service Providers
- Regulation (EU) No 2015/847 of the European Parliament and of the Council of 20 May 2015 on data accompanying transfers of funds and repealing Regulation (EC) No 1781/2006
- Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act).
- 21/2017 (VIII.3.) NGM Decree on the mandatory content of the internal regulations to be prepared pursuant to Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing and Act LII of 2017 on the Implementation of Financial and Asset Restriction Measures by the European Union and the United Nations Security Council
- 26/2020 (VIII.25.) MNB Decree on the detailed rules for the development and operation of the minimum requirements for the implementation of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing for service providers supervised by

the MNB and the Act on the Implementation of Financial and Asset Restriction Measures Ordered by the European Union and the United Nations Security Council

- Commission Delegated Regulation (EU) 2016/1675 of 14 July 2016 supplementing Directive (EU) 2015/849 of the European Parliament and of the Council as regards the identification of third countries with strategic deficiencies as high risk
- MNB Decree 30/2024 (24.VI.) on the detailed rules for the implementation of certain obligations of service providers supervised by the Magyar Nemzeti Bank under the Act on the Prevention and Combating of Money Laundering and Terrorist Financing and on the minimum requirements for the development and operation of a screening system for such service providers under the Act on the Implementation of Financial and Asset Restriction Measures Ordered by the European Union and the United Nations Security Council

III. RELATED OTP DOCUMENTS

- Extract from Compliance Policy of OTP Bank Plc.
https://www.otpbank.hu/static/portal/sw/file/OTP_Compliance_Politikajanak_kivonata_2024.pdf
- The OTP Group Anti-Corruption Policy
https://www.otpbank.hu/static/portal/sw/file/Korrupcioellenes_Politika.pdf
- Wolfsberg questionnaire
https://www.otpbank.hu/static/portal/sw/file/Wolfsberg_s_FCCQ_OTP_Bank_Plc_2023.pdf
- The OTP Group Sanctions Policy
https://www.otpbank.hu/static/portal/sw/file/OTP_Szankcios_Politika_2024.pdf
- Conflict of Interest Policy
https://www.otpbank.hu/static/portal/sw/file/U_BSZUSZ_mellG_Osszeferhetetlensegi_politika_20230801.pdf
- AML declaration https://www.otpbank.hu/static/portal/sw/file/AML_Declaration_2021.pdf