

Annex 4b

OTP BANK CONSUMER PROTECTION COMPLIANCE PROGRAM

The management of the Bank is committed to complying with consumer protection rules and protecting consumers' rights. By compliance with consumer protection rules, we mean compliance with the general consumer protection principles, the legal provisions, the supervisory regulatory expectations, and the relevant decisions of consumer protection authorities.

The Bank applies uniform consumer protection principles in all areas of its activities and takes into account changes in consumer habits and interests. The Bank strives to provide its customers with all the necessary information regarding its products and services, so that they can choose the appropriate service for them.

The purpose of the Consumer Protection Compliance Program (the "Compliance Program") is to facilitate the compliance of the Bank's obligations defined in the consumer protection legislation, resolutions of the authorities, and the internal regulations as well, to define the procedural framework and to provide technical support to all relevant areas of the Bank. The Compliance Program also aims to ensure that all employees and managers of the Bank have a clear understanding of the essence of consumer protection rules, compliance objectives and their importance, and are aware of the risks of non-compliance and the possible consequences.

The Compliance Program implements ex-ante control and continuous monitoring of compliance with consumer protection rules. In case of introduction of new technologies, the Bank pays special attention to regulatory compliance in accordance with the provisions of the Compliance Program.

Compliance with consumer protection rules means not only a comprehensive audit, but the aspects of compliance and customer-centric thinking are integrated into day-to-day business operations. As a result of the conscious application of compliance rules, the efficiency of operations, the confidence of customers and investors in the Bank, and ultimately the value of the company will increase. Given the strong regulation of the financial sector, the Bank considers consumer protection compliance and compliance solutions to be an important factor of competitiveness.

The satisfaction and trust of its customers has always been a top priority for the Bank, therefore continuous compliance with consumer protection principles has been integrated into the day-to-day operations of the Bank. Due to the culture of compliance, the Bank is able to offer a wide range of products and services and serve the financial needs of its customers effectively.

The Compliance Program ensures that all advertising materials and commercial communications published by the Bank are clear and fair, timely and complete, fully inform customers and help them to make the right financial decision. The Bank does not tolerate any conduct of employees, managers or business partners that are illegal or may result in official sanctions.