

ESG Strategy of OTP Bank JSC (OBU)

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Approved by:

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Third version

In connection with the war on the territory of Ukraine, some data are given with a time delay. Certain strategic targets set in this document can only be realized after the end of the war.

Update cycle - annual

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Brief instructions for navigating the strategy

The strategy is divided into **8 sections**

For easy navigation, each page of the strategy has a table of contents at the top. **To move between sections, you need to click on the corresponding section ↓**

Introductory information	ESMS administration	ESG risk management
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Hyperlinks may be hidden inside the strategy, for example to the relevant regulatory act or founding document. Such links are highlighted in **green** or **light green**. **Click on the link to access the relevant document ↓**



List of abbreviations and acronyms

Abbreviations	Description
BEV	Battery electric vehicle
BPP	Biogas power plant
CHP	Combined heat and power plant
CMU	Cabinet of Ministers of Ukraine
CRR	Capital Requirements Regulation
CSR	Corporate social responsibility
CSRD	Corporate Sustainability Reporting Directive
DD	Due diligence
DFC	The United States International Development Finance Corporation
EBRD	European Bank for Reconstruction and Development
ESSF	Energy Security Support Facility
ESG	Environmental, social, and corporate governance
ESMS	Environmental and Social Management System
EU	European Union
EV	Electric vehicle
GAR	Green Asset Ratio
GDP	Gross domestic product
GHG / GHGs	Greenhouse gases
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GWP	Global warming potential
HFCs	Hydrofluorocarbons
HQ	Headquarters
IC	Internal combustion engine
IAR	Internal Audit Recommendation
IDPs	Internally Displaced Persons
IFC	International Financial Corporation
IFIs	International Financial Institutions

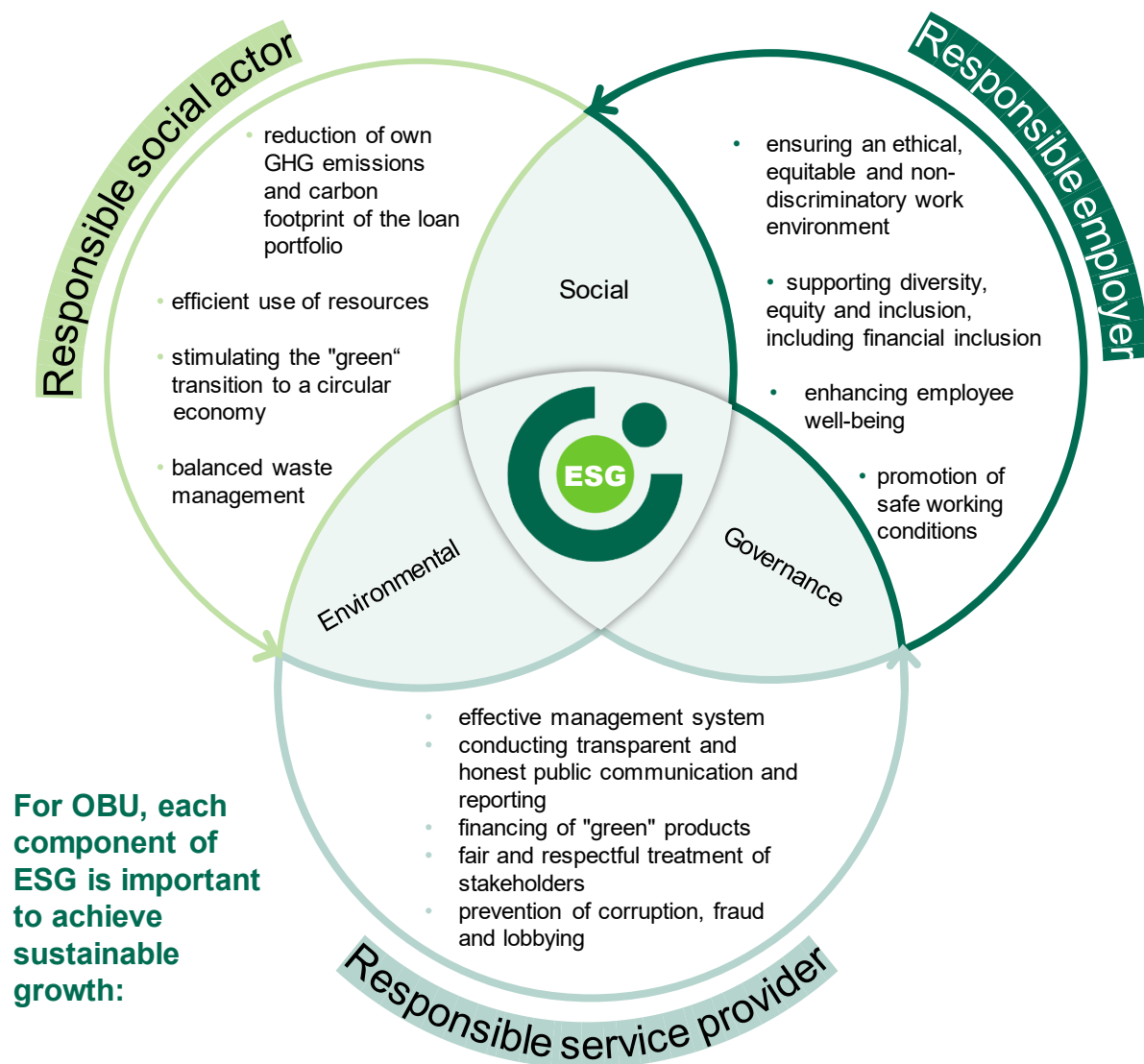
Abbreviations	Description
LU	Law of Ukraine
MNB	Magyar Nemzeti Bank (Hungarian National Bank)
NACE	Statistical Classification of Economic Activities in the European Community
NBU	National Bank of Ukraine
NCV	Net calorific values
NPC	National Power Company
NPP	Nuclear power plant
OLLPs	Operative Lending Limits and Principles
OKR	Objectives and Key Results
PFCs	Perfluorinated compound
PHEV	Plug-in hybrid electric vehicle
PPs	Power plants
RCSA	Risk and Control Self-Assessment
RES	Renewable Energy Sources
SAS	Operational Loss Data Base of HQ
SDGs	Sustainable Development Goals
SFF	Sustainable Finance Framework
S/T	Short-term loans
SME / MSE	Small and medium-sized enterprises
SPP	Solar power plant
TPP	Thermal power plant
USAID	The United States Agency for International Development
US	The United States of America
UPS	An uninterruptible power supply
VAT	Value added tax
WPP	Wind power plant
ZEV	Zero emission vehicle

1

Introductory information



OTP Bank Ukraine understands its responsibility to all stakeholders and fully supports the aspirations of the OTP Group for sustainable low-carbon development



Purpose of this Strategy is to continue the development of the relevant, comprehensive, and transparent road map for the implementation of all ESG components in the Bank's established operation.

OBU considers ESG as a strategic tool for continuous improvement and a guiding pathway **toward sustainable business future**. As a financial institution, we understand the importance of our own role in stimulating the "green" transition to sustainable consumption, circular economy and responsible business conduct, and therefore **strives to become one of the market leaders in Ukraine in terms of sustainable and green financing**.

Like all members of the OTP Group, **OBU fully supports HQ's aspirations and steps in the field of ESG**. Therefore, this strategy is in line with the HQ's ESG strategy which is based on three key pillars: **responsible service provider, responsible employer, and responsible social actor**.

Strategy applies to the entire OBU network in all regions of Ukraine, as well as to all employees and third parties involved interacting with OBU. All OBU employees are responsible for the implementation and execution of the strategy. **The main strategic decisions are made by the OBU Management Board**.

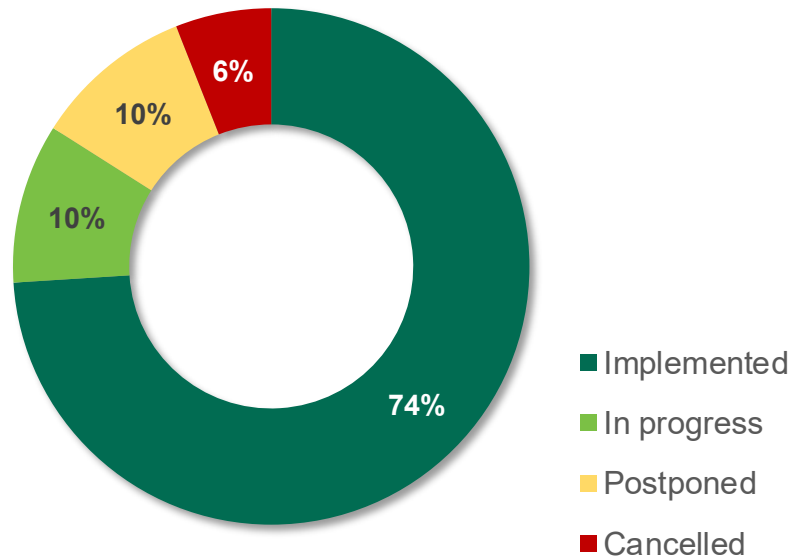
The strategy is an **internal document and may not be distributed without prior consent**. Any parts of the strategy may be shared with prior consent only for the sake of transparency and reflection of OBU's strategic direction in the field of ESG.

Fulfilling our ambitions and targets set by the ESG Strategy 2025

As of the end of 2025, **82%** of the strategic targets have been fully met and implemented.

Thus, the **level of implementation of the ESG Strategy 2025 can be regarded as high**. Despite a difficult business environment, more than 3/4 of the set targets were met, as well as additionally emerged priority goals, which were out of scope of the ESG Strategy 2025.

Condition of implementation of the strategic targets 2025



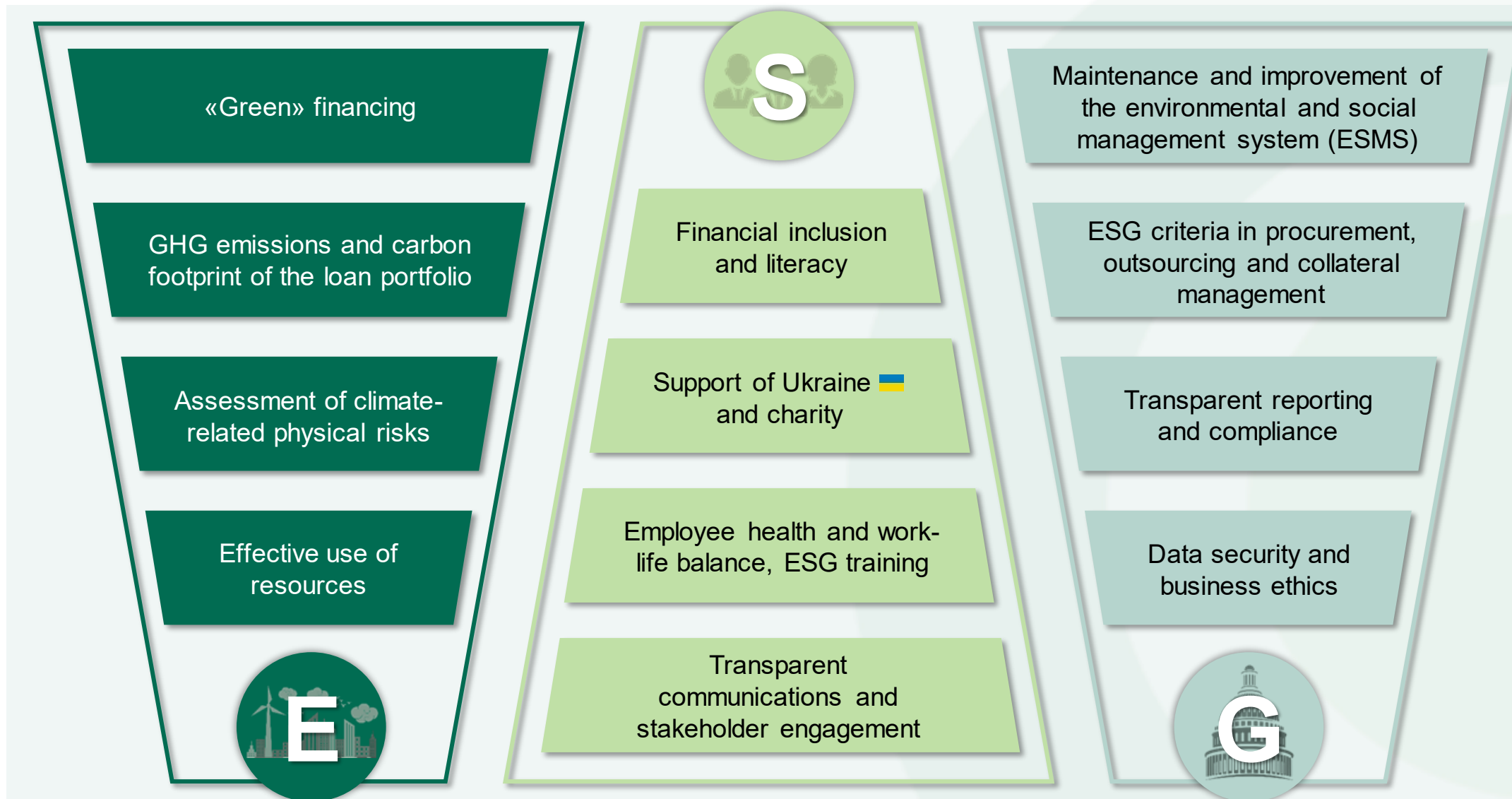
Progress in the implementation of the strategic targets 2025

in terms of key directions



Strategic topics and areas of activity

OBU defines the priority directions of movement in the field of ESG:



An aerial photograph of a winding asphalt road cutting through a dense, lush green forest. Several cars are visible on the road. A large, light teal number '2' is overlaid on the upper left portion of the image. The bottom of the image features a white background with a dark green wavy line separating it from the forest scene.

2

ESMS administration

Environmental and Social Management System (ESMS*) of OTP Bank Ukraine

The environmental and social management system of OTP Bank Ukraine covers all aspects of the bank's operations and consists of **5 key components**:

Environmental and Social Policy

E&S Policy is designed to consolidate and clearly define the Bank's key approaches to environmental protection and social responsibility. The purpose of the Policy is to declare the key principles, approaches, ways and methods of managing the Bank's actual and potential positive and negative impacts on the environment and society, as well as to assess the reverse impacts (risks) on the Bank.



Click
here
or scan



Mechanism for managing ESG risks and factors

ESG risk and factor management mechanisms are designed to clearly define the boundaries, principles, and sequence of the Bank's actions on the path to achieving sustainable development. The key task of ESG risk management is to identify risks arising from environmental and social factors related to financing of the Bank's customers, as well as to minimize their impact.



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Organizational structure and competence of employees

The Bank establishes and maintains an effective, viable and homogeneous organizational structure of the ESMS, which is designed for effective, comprehensive, timely and transparent management of ESG factors and risks. The Bank's employees responsible for environmental protection and social responsibility have specialized competencies and knowledge for successful measures and actions.



More information
on the next slide



Mechanism for external communications and feedback

The Bank's approach to stakeholder engagement is based on the principles of respect for human rights, mutual respect, equal opportunities, non-discrimination and fair treatment regardless of external conditions. To ensure a transparent mechanism for communication with stakeholders, the Bank has a list of channels that provide the opportunity to submit an anonymous message or appeal.



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or scan



Monitoring and reporting practices

Fair access to quality and relevant information is an indicator of socially and environmentally responsible business. The Bank supports transparent reporting and the publication of reliable data, and therefore maintains and constantly improves the system of internal and external reporting, as well as public communications.



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or scan



* Here and throughout the Strategy, ESMS refers to a system developed in accordance with the World Bank standards under the "Affordable Loans 5-7-9%" program

ESG Governance Structure and Responsibility Allocation within the OTP Bank Ukraine

The Management Board is the decision-making body responsible for providing focused oversight on the effective implementation of ESG in all areas of the OBU's operations



Volodymyr Mudryi
Chairman of the Board

Public communications on ESG issues, responsible employment and development of CSR programs



Oleg Klymenko
Retail business line

Development and implementation of "green" products in the retail business line



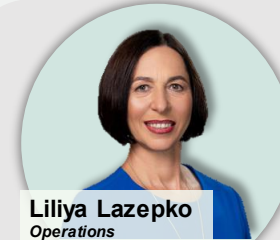
Alla Biniashvili
Corporate business line

Development and implementation of "green" products in the corporate business line



Taras Prots
Risk Management line

Oversees the implementation of ESG within the Bank's risk management framework



Liliya Lazepko
Operations

Bank decarbonization and rational use of resources



Peter Andor Koreck
Finance

Effective control, data governance and timely reporting in accordance with the Group standards

Igor Nefidov
Head of Department

Maksym Oliynyk – Head of Sector
 Viktoriia Zinchenko – ESG Expert
 Inesa Petrovska – ESG Expert

Sustainable Development Sector at Non-financial Risks Management Department

- plays a pivotal role in supporting the Board on matters of ESG and implementation of all ESMS components into the Bank's operations in alignment with regulatory, business and market requirements

Human Resources Directorate

- Collection and processing of information on social, economic and management indicators;
- Implementation of social projects for Bank employees

Customer Experience Management Unit

- Support of the communication channel with stakeholders;
- Processing of customer complaints

Financial Institutions Unit

- Cooperation with International Financial Institutions (EBRD, IFC etc)

Compliance Department

- Ensure compliance with the requirements of the Ukrainian legislation, including those related to ESG

Communications and Public Relations Sector

- Public reporting on the bank's ESG approaches;
- Development of CSR and socially responsible business management

Retail Business Development Directorate

- Implementation of retail "green" products and evaluation of their involvement effectiveness;
- Annual review and monitoring of retail "green" products

Retail Sales & Network Management Directorate

- Client relationship management;
- Provide retail "green" products offerings and support for credit deals

Car Loans Sales Unit

- Provide e-car loans and support for credit deals

Corporate Finance Directorate

Corporate Sales Directorate (Large Caps)

Corporate Sales Directorate (Mid+Small Caps)

- Verification of clients according to the ESG exclusions list;
- Conducting ESG due diligence of corporate business clients (if necessary);
- Assessment of the impact of corporate business clients on ESG areas and the reverse impact (ESG on the client);
- Implementation of corporate and SMEs "green" products and evaluation of their involvement effectiveness;
- Annual review and monitoring of corporate and SMEs "green" products;
- Client relationship management;
- The organization, coordination and control of the active sales and cross-selling of "green" products to SME / large corporate clients and support for credit deals

Credit Risk Analysis & Approval Directorate

- Verification of clients against the ESG exclusions list as a post-control;
- Identification, assessment and assignment of ESG risk categories;
- Annual review and monitoring

Collateral Monitoring & Evaluation Department

- Support for physical and transitional climate risks assessment in collateral management in accordance with HQ's regulations

Operational Risk Management Unit

- Assessment of ESG risks within the framework of scenario analysis;
- Identification of operational risk events related to ESG;
- Consideration of ESG risks within the framework of RCSA;
- ESG risk assessment in outsourcing

Risk Control Unit

- Management of corporate governance issues (G)

Development & Procurement Directorate

- Collection and processing of information on environmental and energy indicators;
- Implementation of energy-saving and energy-efficient technologies;
- Implementation of decarbonization measures;
- Monitoring and analysis of the efficiency of the Bank's car park use and third parties involved in the provision of transportation services;
- Implementation of effective waste management measures;
- Implementation of resource-efficient measures

Data Governance & Reporting Development Unit

- Support and maintenance of the financial reporting;
- Timely presentation of financial reporting to the Bank's management and shareholders;
- Coordination, supporting and providing processes and methodology of the data governance activity;
- Implement processes to monitor and improve the quality and timeliness of financial data according to OTP Group and other standards

3

**ESG risk
management**



ESG in credit risk management (1/2)

To ensure compliance with the regulatory requirements of EU and in order to handle ESG risks appropriately ESG Risk Management Framework was introduced in June 2021 on the OTP Group level and non-retail lending procedures of OBU were also adjusted accordingly

Implementation status

ESG Risk Appetite

In relation to our customers, OTP Group's **ESG Exclusion List** is the central steering document that lists the activities that are not supported by us. Our new customers should not engage in the activities listed in the ESG Exclusion List. The Risk Appetite is supplemented by ESG limits, the lending guidelines for environmental and climate risks and the guidelines for the assessment of financial risks based on these risks, included in the OLLP.



ESG Exclusion List

The Exclusion list contains activities and behaviours whose controversial nature and impact make them incompatible with OTP Group's and OBU's values for safeguarding human rights and promoting sustainable development. Screening of the clients against the Exclusion List is done for credit products (incl. trade finance, documentary business, as well as factoring and leasing products). While **new clients will be subject to zero credit tolerance**, existing clients' term loans will be subject to natural amortization with their S/T loans being renewed upon consideration of ESG, credit and reputational risks



Sectoral ESG Risk Heat Map & ESG Risk Categories to Clients

The **Sectoral ESG Risk Heat Map** lists the ESG risk classification of each activity based on the NACE code list. Sectoral ESG risk categories are assigned based on the environmental and social impact of the given industry, furthermore, taking into consideration sector specific physical and transition risks. Four risk categories apply (low, medium, medium-high, high). ESG risk category of the clients is determined using the Sectoral ESG Risk Heat Map



ESG Risk Categories to Transactions (including ESG Due Diligence)

Assignment of the ESG risk category of a transaction is driven by the ESG risk category of the client and the residual length of the transaction. In case the exposure of the client exceeds the threshold of EUR X mln and ESG risk categorization of the client is High or Medium-High, **ESG Due Diligence** questionnaire is applied. Result of the due diligence may improve the ESG risk category by one notch (↑).

Length of the transaction	ESG risk category of the transaction			
	Long-term	Medium	Medium-High	High
	Medium-term	Low	Medium	Medium-High
	Short-term	Low	Medium	Medium
		Low	Medium	Medium-High
			Medium-High	High



Sectoral / client ESG risk category

ESG in operational risk management (1/2)

In order to implement the requirements of Parent bank (Operational Risk Management Policy (No. of the document: 222/2025)) the following steps have been implemented regarding the ESG factors in operational risk:

Loss Data Collection

- Events recorded in local loss database as well as in SAS loss database are accompanied with a mark on relation to ESG.

Implementation
status



Risk and Control Self-Assessment

- Evaluation of ESG relevance of identified risks within the framework of RCSA.



Scenario Analysis

- Identification of all operational risk scenarios on their relation to ESG factors;
- ESG factors assessed within the framework of the scenario of operational risks: "Climate change risk" (at the HQ level):

Climate scenario used: RCP8.5

The following risks were examined: Heat Wave, Soil degradation, Sea level rise, Air pollution, Drought, Earthquake, Flood, Forest fire, Spring frost, Windstorm, Landslide, Biodiversity loss, Extreme precipitation



ESG Risks in Outsourcing

- ESG risk assessment of outsourcing providers.





**Green
loan
book**

4

Regulatory framework and incentives relevant to Ukraine

GLOBAL

2015 The Paris Agreement

2016 - LU on Ratification of the Paris Agreement

2015 The UN Sustainable Development Goals

2019 - Decree of the President of Ukraine "On the Sustainable Development Goals of Ukraine for the period until 2030"

EUROPE

2020 EU Taxonomy

gradual implementation as a part of European integration process

2022 Corporate Sustainability Reporting Directive (CSRD)

gradual implementation as a part of European integration process

2022 CRR Pillar 3 disclosures on ESG risks

gradual implementation as a part of European integration process

Ukraine

Please refer to the next slide

Regulatory framework and incentives in Ukraine

Energy efficiency is a key to Ukraine's climate and energy security

- 2003
LU "On Alternative Energy Sources"
- 2017
LU "On Energy Efficiency of Buildings"
- 2021
LU "On Energy Efficiency"
- 2023
The Energy Strategy of Ukraine for the period until 2050"
- 2025
Requirements for buildings with nearly zero energy consumption (NZEB)

Financial literacy

- 2025
The National Strategy for Financial Literacy Development until 2030

Mitigation and adaptation to climate change

- 2024
Law No. 3991-IX on the State Climate Policy

Sustainable finance play a vital role in Ukraine's recovery

- 2020
LU "On Amendments to Certain Legislative Acts of Ukraine Regarding Simplification of Investment Attraction and Introduction of New Financial Instruments"
- 2021
The Strategy for Environmental Security and Adaptation to Climate Change for the period until 2030"
- 2024
Sustainable Finance Roadmap 2025-2030

The components of ESG are being incorporated and strengthened through various legal acts in Ukraine, driven primarily by EU harmonization

Implementation of Sustainability Reporting

- 2024
The Resolution of the CMU "On the Approval of the Strategy for the Implementation of Sustainability Reporting by Enterprises"

ESG risk management

- 2025
The White Paper on ESG risk management in the financial sector
- 2026
Methodological recommendations of the NBU on the organization of corporate governance in Ukrainian banks

Financial inclusion

- 2021
The National strategy for creating a barrier-free environment in Ukraine 2030
- 2024
NBU's Guidelines on the rules of inclusive financial services in Ukrainian institutions"

Market analysis: Real estate (energy efficiency) (4/4)

Due to the war and effects on Ukraine's energy infrastructure

622 cities and villages in Ukraine were on average cut off every day as a result of the war in the period from March 2022 to March 2023. The result is

462 thousands consumers, which is more than population of Poland

Restoration of energy infrastructure is a priority for the Ukrainian government

Results of the program "Restore House" in 2023-2025 Energy Efficiency Fund, EU



Restoring energy infrastructure is a priority for the Ukrainian government

Ukraine's energy consumption decreased sharply as a result of the war, and due to significant damage to residential and commercial buildings, the issue of restoration becomes acute. Due to the fact that the "Restore House" program is financed from EU funds, special attention is paid to improving energy efficiency, with the aim of increasing energy efficiency standards and ensuring the long-term development and restoration. Also, using the program for the development of Ukraine's industry, the gradual reduction of energy consumption and the reduction of the energy intensity of the economy. The energy efficiency upgrade will improve energy efficiency and energy security, including from private financial institutions, etc.

S Strengths

- ✓ Reduction of operating expenditures and cost savings by households and individuals due to a decrease in the level of consumption of energy resources;
- ✓ Reduction of emissions of GHG and other pollutants, thanks to which support from the state is ensured on the way to achieving the strategic goal of carbon neutrality of Ukraine;
- ✓ A gradual increase in the number of people able to afford basic energy services.

W Weaknesses

- ✓ The technical impossibility at a certain type of building to implement energy and thermal modernization measures due to the peculiarities of the construction of the facade, networks, roof, etc.;
- ✓ Low level of public awareness of measures to increase energy efficiency, as well as of the expediency of significant one-time investments to obtain further operational benefits;
- ✓ The need for start-up capital and an energy audit.

O Opportunities

- ✓ During the restoration and rebuilding of destroyed communal and residential infrastructure, it is possible to apply "green" principles to increase the energy efficiency of buildings;
- ✓ **Increasing number of funding programs for the implementation of energy efficiency measures, both state and private;**
- ✓ Increasing environmental awareness of the population and understanding responsibility for damage to the environment;
- ✓ Changes in consumer behavior in favor of energy-saving technologies and autonomous heating systems.

T Threats

- ✓ Impossibility of obtaining permits for the implementation of measures to increase energy efficiency due to conservation status or other regulatory restrictions (for example, insulation of the facade of a building of local importance), or an increase in the cost of such works due to complexity;
- ✓ Competition in the prospective market;
- ✓ Deterioration of the security and business situation due to the war on the territory of Ukraine.

Market analysis: Agriculture (4/4)

Potential of bioenergy in Ukraine

1. Potential of agricultural waste and energy crops. Assessment of oil-seed



2. Potential for growing energy crops. For



3. Bioethanol potential, etc. etc.



The main goal of the transition to low-carbon energy production must contribute to support for the energy sector for the energy transition of their own resources. Considering the fact that the agricultural sector is one of the largest and most important sectors of the economy, the potential for the development of bioenergy for the country is estimated to be very significant. Currently, in Ukraine, about 10% of the total potential and only 1-2% of bioethanol potential have been realized.

According to the [Green Transition Strategy 2020-2030](#), Ukraine has set a strategic target to develop green generation capacities based on biomass and sugar beet, meeting 10% of electricity needs in green-field consumption. Taking into account the strategic value, it is possible to state a conclusion about the government's interest in the development of bioenergy capacities and therefore in the further support of the sector by the state.

Thus, taking into account the strategic importance of the industry, the interest and support of the government, the rapid growth, as well as the significant potential for the development of bioenergy, it is obvious that the investment attractiveness of this sector can be considered quite high.

S Strengths

- ✓ The agricultural sector in Ukraine creates about 10% of the country's GDP and is strategically important for the functioning of the economy;
- ✓ The development of bioenergy capacities gradually replaces the import of natural gas, coal and liquid fuels, which reduces dependence on fossil hydrocarbons;
- ✓ Bioenergy projects generate additional income for small farmers from the sale of agricultural residues as raw materials;
- ✓ Savings and reduction of household operating costs due to the use of electric transport in agriculture;
- ✓ **Considerable potential of Ukraine in the field of bioenergy development.**

O Opportunities

- ✓ **A large number of directions for financing: bioenergy, agricultural technology, restoration of disturbed lands, and in the future - transportation and storage of biomass, biogas transmission systems, organic farming, etc.;**
- ✓ State support in connection with the strategic importance of the sector, as well as plans for a low-carbon energy transition;
- ✓ A large number of small business entities that need financial support to run their own business activities;
- ✓ Possibilities of post-war reconstruction and development of the bioenergy and sustainable agriculture sectors.

W Weaknesses

- ✓ Inability to predict yields due to changing weather conditions, which creates uncertainty for producers (for example, lack of biomass);
- ✓ Absence of biomass market;
- ✓ Long payback period for bioenergy facilities;
- ✓ Presence of large agricultural holdings;
- ✓ Weak regulatory framework for regulating issues of bioenergy, agricultural electrical engineering and land reclamation.

T Threats

- ✓ Concentration of a significant part of the agricultural market by agricultural holdings;
- ✓ Deterioration of the security and business situation due to the war on the territory of Ukraine.

Existing cooperation of the OTP Bank Ukraine with IFIs

OTP Bank Ukraine and IFC and EBRD

OBU proudly maintains a robust and multifaceted partnership with the EBRD and IFC, rooted in shared goals of fostering economic development, promoting financial inclusion, and facilitating sustainable trade across the region.

Through the Trade Facilitation Programs (TFP and GTFP), OBU collaborate with the EBRD and IFC to support and expand trade flows, ensuring our clients have seamless access to the international markets. This program (signed in 2002) enables OBU to issue documentary instruments in favour of international confirming banks, covering the political and commercial risks of cross-border trade transactions. It also provides financing for pre-export, post-import, and local distribution of imported goods, empowering businesses to grow and thrive in a competitive global marketplace.

As part of collaboration, the EBRD and IFC share risks associated with financing projects in key sectors. For this purpose OBU have signed several Risk Sharing Agreements with these international financial institutions. This enables OBU to extend its lending capabilities, provide financing to underserved sectors, and support innovative ventures. By jointly managing risks, OBU ensure the stability and resilience of financing operations, encouraging investments in infrastructure, energy, technology, and other critical industries.

Partnership is designed to strengthen the region's financial ecosystem, providing businesses with greater access to credit and facilitating the development of sustainable trade networks. In alignment with the sustainability goals of the mentioned international financial institutions, OBU focus on promoting environmentally responsible projects and supporting green initiatives. This includes financing energy-efficient projects, renewable energy ventures, and innovative solutions that contribute to sustainable development.



OBU values cooperation with IFIs and is *always ready for new types of joint actions*. In cooperation with partners, the Bank adheres to the rules of fair, respectful and responsible partnership.

OBU understands the important role of partnership in the transition to sustainable development, and therefore strives to be transparent, open and flexible during cooperation.

17 PARTNERSHIPS
FOR THE GOALS



OTP Bank Ukraine and WB & ФРП

OBU is a participant in the program "Affordable Loans 5-7-9%", which is implemented by the Government of Ukraine at the initiative of the President of Ukraine through the Business Development Fund with funds from the World Bank. The program provides investment loans and working capital for representatives of small and medium-sized businesses.

Since December 12, 2024, the Bank has been participating in the **ARISE** program for lending to representatives of agricultural SME. Within the framework of ARISE, the Bank has implemented a separate procedure for assessing the environmental and social risks of borrowers, which operates on the basis of the usual approach to assessing ESG risks in lending.



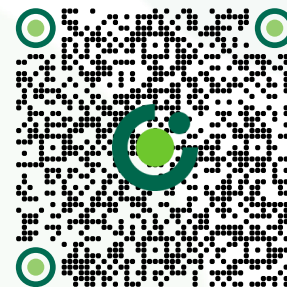
OTP Bank products: Loans for electric cars with mileage – green sub-product *

463

 clients

received loans since program launch (May 2025)

Click here or scan to find out
more about product conditions



Purpose of sub-product: Lending for electric cars (BEVs, battery electric vehicles) without age and mileage restrictions.

Advantages: Speed of receiving funds (loan decision and transfer of funds within 1 day); freedom in choosing a car (no restrictions on age and mileage); no additional burdens (no collateral and mandatory CASCO insurance)

217

 mln UAH

the total volume of loans issued to clients since program launch (May 2025)

Customers have the ability to buy an electric car for order (from the USA, Europe, China, etc.). This has a number of advantages:

lower cost compared to
the local market

large selection of
models and completes

the best technical
condition and real
mileage

modern batteries
and technological
solutions

For convenient buying and selling of cars throughout Ukraine, OBU has created a separate automotive credit marketplace **Ponova by OTP Bank**. All cars (offers of individuals and auto markets) on the platform can be purchased on credit.

* The green sub-product is part of the parent product and meets the requirements of items 7.8.1 and 7.8.2 of the Bank's Environmental & Social Policy, which is publicly available at the link: <https://www.otpbank.com.ua/about/sustainability/esg-policies-and-procedures/>

* OBU green products are not yet fully harmonized/aligned with OTP Group green definition. HQ and OBU agreed not to establish any official green KPI until the end of the war in Ukraine

OTP Bank products: Energy efficiency loans for individuals – green sub-product *

122

loans issued under the program
Universal Energy in 2025



Solar power plant
83.61%

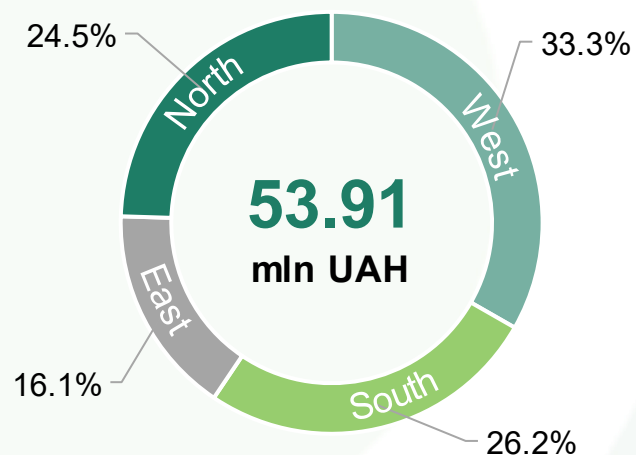
Inverter
& storage
9.84%

Heat
pump
6.56%

Purpose of sub-product: Financing for the purchase of installations that generate electricity from alternative energy sources (solar and wind power plants, as well as all necessary equipment to ensure their operation).

Having an alternative option for obtaining electricity is essential due to existing challenges in Ukraine. OBU recognizes this need and therefore offers loans on favorable terms for the purchase of installations that generate electricity from alternative energy sources (solar panels, wind and gas turbine power plants, collectors, heat pumps, hybrid power supply systems).

The total volume of loans issued to clients in 2025



by direction, %

Advantages:

no restrictions on the size of the house and additional requirements for equipment

possibility of connecting the "green" tariff and earning additional income

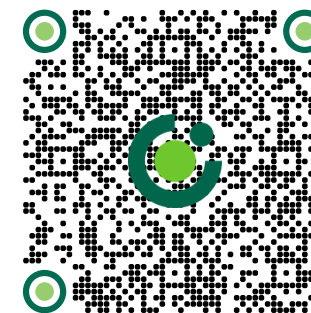
ensuring energy independence thanks to the inexhaustible power of the sun

savings on utility bills

fast and convenient - get a preliminary decision in just 15 minutes and receive your money today

absolutely transparent — no hidden fees

Click here or scan to find out more about product conditions



* The green sub-product is part of the parent product and meets the requirements of items 7.8.1 and 7.8.2 of the Bank's Environmental & Social Policy, which is publicly available at the link: <https://www.otpbank.com.ua/about/sustainability/esg-policies-and-procedures/>

* OBU green products are not yet fully harmonized/aligned with OTP Group green definition. HQ and OBU agreed not to establish any official green KPI until the end of the war in Ukraine

OTP Bank products: Financing of energy efficient agricultural machinery (EBRD program) – green sub-product *



204 clients
received loans in 2025

Purpose of sub-product: To support sustainable investments in green and zero-emissions technologies by enterprises, in particular to meet the needs of local agricultural producers in updating agricultural machinery with modern green products of global brands.



1.68 bn UAH
loans issued in 2025



of which **3** mln EUR
in incentives (cashbacks) were received in 2025

OBU, in cooperation with the EBRD, offers a unique program — loans with the possibility of partial compensation of their amount. The donor of grant funds under the program is the European Union within the framework of the EU4Business initiative.

Borrowers belonging to vulnerable categories are entitled to an increased level of investment compensation, namely:

women in business

youth in business

businesses of people with disabilities

relocated enterprises (and owned by relocated persons)
and those that have assets destroyed due to war

veterans who run their own business
(or those who provide jobs
or services to veterans)

Advantages:

Partial refund of the loan amount: depending on purchased machinery and client's category from 10% to 30% of costs financed by the Bank (without VAT). The machinery and equipment to be purchased should be acceptable by EBRD and technical consultant.

Click here or scan to find
out more about product
conditions



* The green sub-product is part of the parent product and meets the requirements of items 7.8.1 and 7.8.2 of the Bank's Environmental & Social Policy, which is publicly available at the link: <https://www.otpbank.com.ua/about/sustainability/esg-policies-and-procedures/>

* OBU green products are not yet fully harmonized/aligned with OTP Group green definition. HQ and OBU agreed not to establish any official green KPI until the end of the war in Ukraine

OTP Bank products: Energy efficiency loans for corporate business – green sub-product *

OBU supports the ambitions of businesses across various sectors of the Ukrainian economy by financing the transition from outdated, energy-intensive technologies to modern, energy-efficient solutions.

Purpose of sub-product: providing loans to purchase new energy-saving equipment, upgrade existing equipment for the purpose of energy saving, and modernize or expand production. This sub-product also supports financing renewable energy sources, with a primary focus on **solar power plants**.

Advantages:

Financing covers up to 80% of the investment project budget (incl. VAT)

Favorable interest rates

The financing can be provided under state program “Affordable loans 5-7-9%” or under Memorandum signed between top banks

Energy cost savings



32 clients

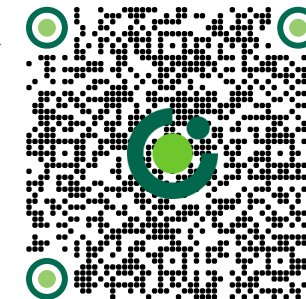
received loans on installation of solar power plants



188.04 mln UAH

the total volume of loans issued for the purchase of solar power plants

Click here or scan to find out more about product conditions



OBU offers a special financing program that will help ensure **energy security for businesses**. The bank provides an opportunity to obtain a loan for the purchase of energy generating equipment (solar power plants, energy storage, wind turbines etc.), which will ensure uninterrupted energy supply and independence from external factors. **Additionally, new Energy Framework was approved for Y2026 which allows to finance electricity generation for sale to the grid.**

Advantages:

Favorable interest rates

The financing can be provided under state program “Affordable loans 5-7-9%” or under Memorandum signed between top banks

Minimum package of documents

Possibility of setting a grace period for repayment of the loan principal

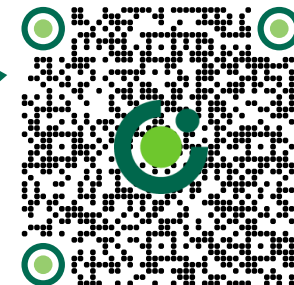
Subprogram under the EBRD risk-sharing agreement

up to 30% compensation from the EBRD (the European Union is the donor of grant funds under the program)

Accelerated review procedure

No additional collateral

Click here or scan to find out more about product conditions



* The green sub-product is part of the parent product and meets the requirements of items 7.8.1 and 7.8.2 of the Bank's Environmental & Social Policy, which is publicly available at the link: <https://www.otpbank.com.ua/about/sustainability/esg-policies-and-procedures/>

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5

Environmental responsibility



Overview of GHG emissions sources of OTP Bank Ukraine and a list of data for calculations

Scope 1

Emissions from stationary sources

CO₂, N₂O, CH₄ emissions from:

- combustion of gasoline, diesel (generators)
- combustion of natural gas (boiler plants)

Bank data	Volume of gasoline (l), diesel (l) and natural gas (m ³)
Data for calculation (coefficients, open data)*	For CO₂: density, NCV, carbon content factor (C), conversion factor For N₂O: density, NCV, N ₂ O emission factor, global warming potential (GWP) For CH₄: density, NCV, CH ₄ emission factor, global warming potential (GWP)

Emissions from mobile sources

CO₂, N₂O, CH₄ emissions from:

- combustion of gasoline, diesel (cars)

Bank data	Volume of gasoline (l) and diesel (l)
Data for calculation (coefficients, open data)*	For CO₂: density, NCV, carbon content factor (C), conversion factor For N₂O: density, NCV, N ₂ O emission factor, global warming potential (GWP) For CH₄: density, NCV, CH ₄ emission factor, global warming potential (GWP)

* for partial use of the more accurate Tier 3 approach, data on density and NCV for gasoline and diesel can be requested from liquid fuel suppliers (OKKO, WOG)

Freon (HFCs and PFCs) emissions from:

- leaks during the operation and maintenance of air conditioners and refrigeration equipment

Bank data	Number of installations, types of freon (R-507, R-404A, etc.) used, period of operation in the reporting year, amount of freon in installations (kg) / power (kW) and brands of equipment
Data for calculation (coefficients, open data)	Coefficient of emissions during operation, coefficient of emissions at the end of the service life, coefficient of utilization efficiency, GWP

Scope 2

CO₂, N₂O, CH₄ emissions from:

- consumption of purchased electricity (- electricity for air conditioning)
- consumption of purchased heat
- electricity consumption for cooling (air conditioning)

Location-based method

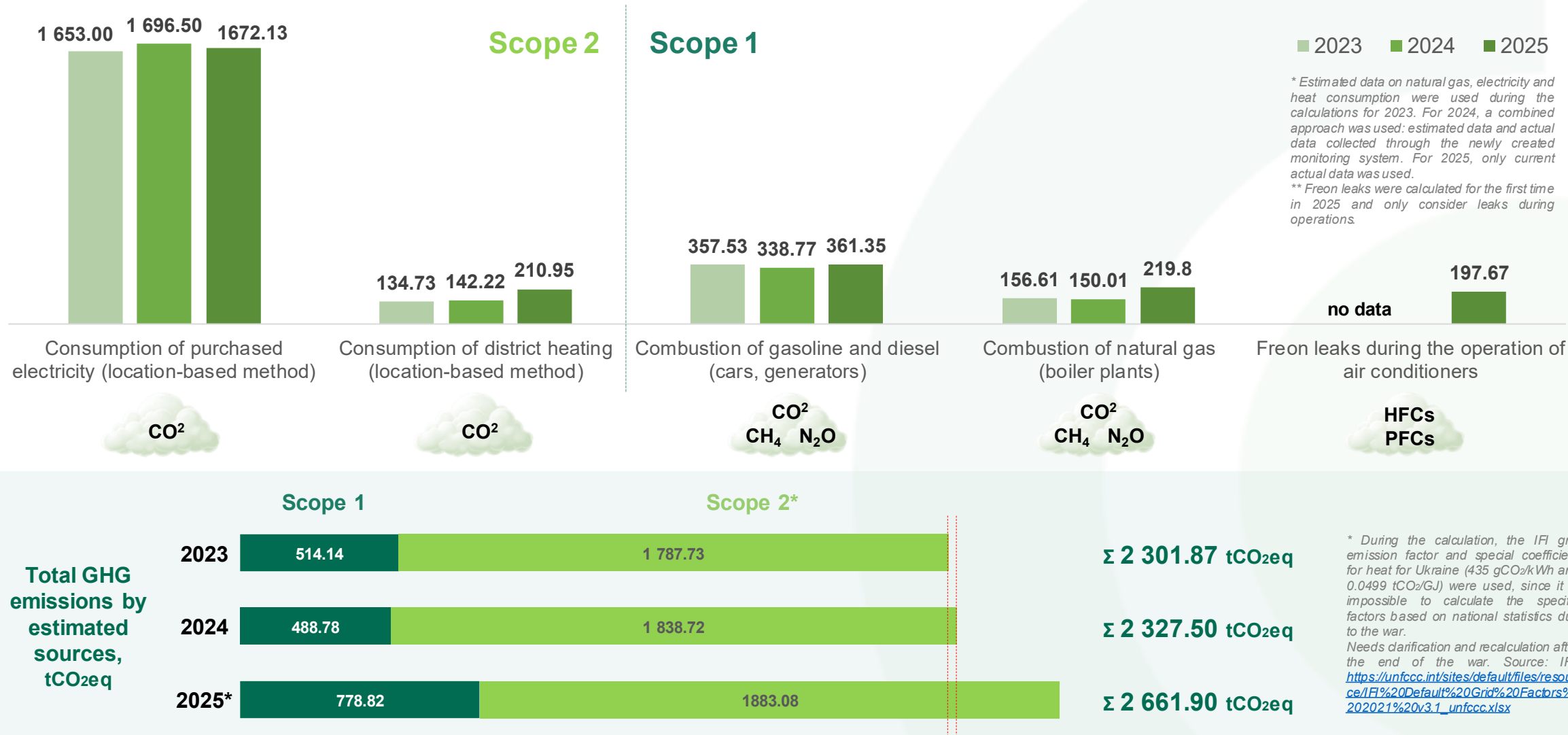
Bank data	The amount of electricity that was purchased and used, including for air conditioning (kWh), the amount of heat used (J)
Data for calculation (coefficients, open data)	State statistics on the composition of the energy grid mix for the reporting year, the share of import/export (if the composition of the entire mix, and not only the one generated in Ukraine), the use of fuel by energy-generating enterprises (coal by grade, natural gas, fuel oil etc.), emission factors, carbon content factors (C), density, NCV, global warming potential (GWP)

Market-based method

Bank data	The amount of electricity that was purchased and used, including for air conditioning (kWh), the amount of heat used (J), the share of each type of generation in the used electricity and heat (NPP, RES, TPP/CHP, cogeneration installations, etc.)
Data for calculation (coefficients, open data)	Emission factors, carbon content factors (C), density, NCV, global warming potential (GWP)

GHG emissions of OTP Bank Ukraine (Scope 1 and Scope 2)

Results of the GHG emissions inventory of the OBU for 2023-2025, tCO₂e_q



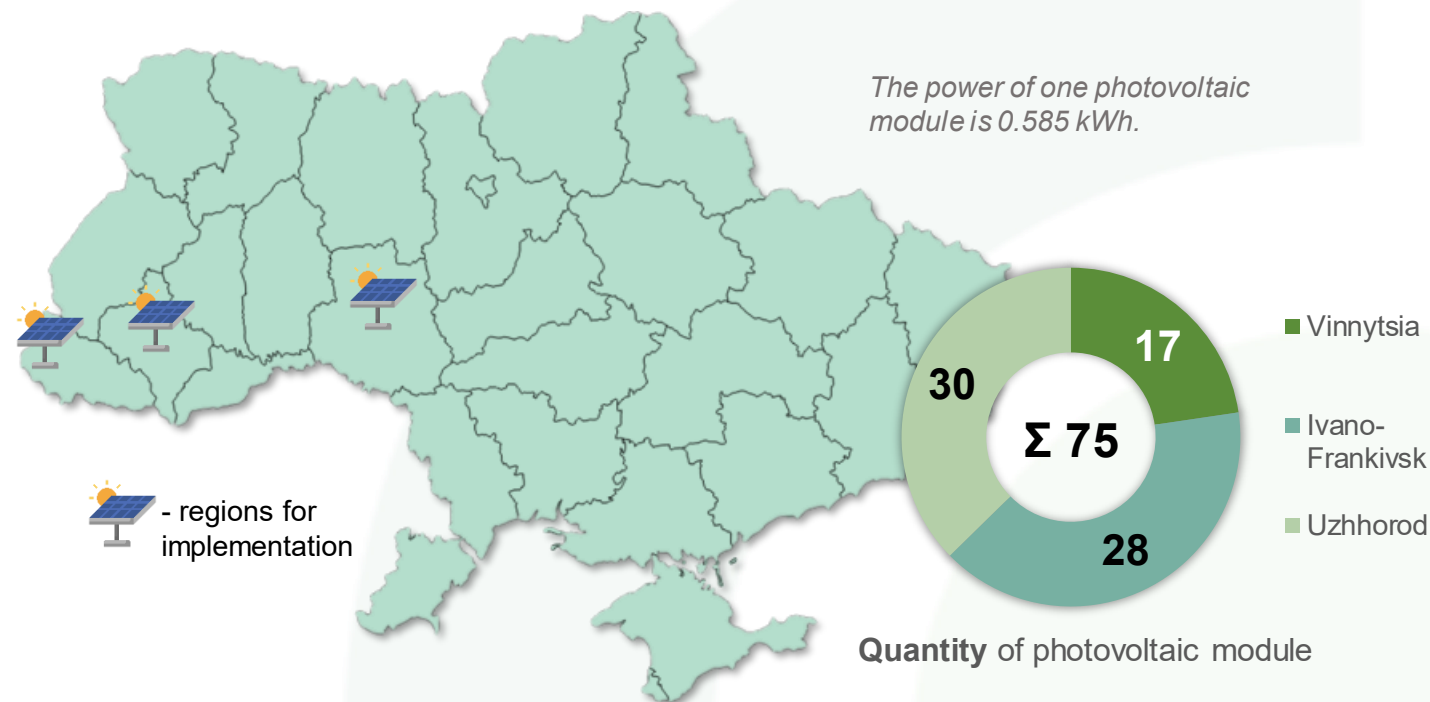
* The significant increase in GHG emissions in 2025 is primarily due to the inclusion of freon leaks that were not considered in previous years.

Planned project to install solar power plants in OTP Bank Ukraine

Project goal: Ensuring partial energy independence of banking premises by installing networked rooftop solar power plants.

The implementation of the project will:

- ✓ reduce electricity consumption from the network;
- ✓ reduce operating costs;
- ✓ increase energy efficiency;
- ✓ contribute to the implementation of environmental policy and responsible use of resources;
- ✓ increasing the stability of power supply in the Bank's branches.



Planned results of the project

To calculate the monthly energy output from solar panels, the following formula was used:

Estimated monthly kWh = Module kWh * Monthly total sun hours * Efficiency ratio (75%)

	Vinnytsia	Ivano-Frankivsk	Uzhhorod
Electricity saving, kW/year	13 166	19 289	18 202
Reducing consumption	43%	46%	23%
Reduction of CO ₂ emissions, t/year	5.73	8.39	7.92

During the calculation, the IFI grid emission factor for Ukraine (435 gCO₂/kWh) was used, since it is impossible to calculate the specific factor based on national statistics due to the war.

Source: IFI,
https://unfccc.int/sites/default/files/resource/IFI%20Default%20Grid%20Factors%202021%20v3.1_unfccc.xlsx

* Data on electricity consumption by branches to calculate the percentage of consumption reduction for 2025

An aerial photograph of a two-lane asphalt road winding through a dense, lush green forest. The road curves from the bottom left towards the top right. Three cars are visible on the road: a dark car in the lower left, an orange car in the middle, and a small red car further up the curve. The left side of the image features a large white area with a green, irregular border, resembling a torn piece of paper. Inside this white area is a large teal number '6' and the text 'ESG training & increase of ESG awareness' in a bold, dark green font. In the bottom right corner, there are faint, semi-transparent green circular patterns.

6

**ESG training &
increase of ESG
awareness**

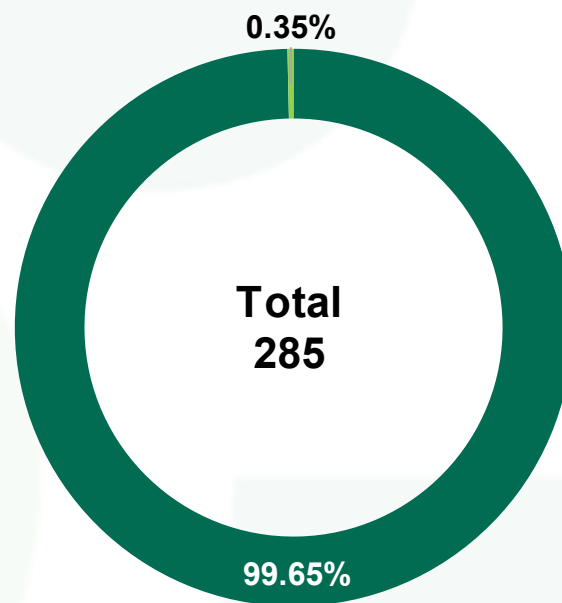
Training on ESG risk management in lending to non-retail business of OTP Bank Ukraine

- ✓ The electronic course **«ESG risk management in lending to non-retail business of OTP BANK JSC»** was developed with the aim of familiarizing the Bank's employees with general concepts regarding the definition of ESG risk, factors of its occurrence, types, methods of its assessment and control, as well as the structure of the ESG risk management system in the bank.
- ✓ **Target audience.** The course "ESG risk management in lending to non-retail business of OTP BANK JSC" is mandatory for employees of the following units: *Credit Monitoring and Administration Dir.*; *Credit Risk Analysis and Approval Dir.*; *Corporate Finance Dir.*; *Corporate Sales Dir. (Mid+Small Caps)*; *Corporate Sales Dir. (Large Caps)*; *Corporate Sales Department (regional network)*.
- ✓ **Periodicity.** The course takes place annually in accordance with the *«Plan for training and professional development in risk management issues for employees of JSC "OTP BANK" and the Foreign Banking Group of OTP in Ukraine»* for the current year, approved by the Order of the Chairman of the Bank's Management Board. The course duration is 21 calendar days. After the end of the deadline, the course is assigned again for a similar period to those employees who did not pass it the first round.
- ✓ **Passing results.** After each period of passing course, an employee of the Risk Control Unit monitors the results of the course and prepares a report for CRO in the presentation form. A positive result of passing the course is exceeding the minimum passing threshold of 70% of the number of employees in the target unit.

ESG risk management in lending to non-retail business of OTP BANK JSC

(E-learning results in 2025)

General E-learning statistics



E-learning statistics by Business line



Passing rate: **99.65%**

New online course on sustainable development in OTP Bank Ukraine

An online course "**Sustainable Development and OTP Bank**" has been developed to deepen employees' knowledge in the field of sustainable development. In 2026, it will be available to all employees of OTP Bank Ukraine.

1



2



3



The course will be **available to all bank employees**, regardless of their field of expertise or position level. It is designed to provide a clear understanding that ESG applies to all bank processes and that every employee can benefit on the path to sustainable development.

4



Among the employees who complete this course, **3 winners** will be selected and will receive a branded hoodie.

This course covers the following topics:

- What's happening with the climate?
- Causes of greenhouse gas emissions
- Why is sustainable development needed?
- ESG: factors, risks and effects
- What does OTP Bank do for sustainable development?
- How can you reduce your own carbon footprint?



Social responsibility

Responsible social actor: strategic charity areas



Environmental protection

Key areas include efficient resource use, waste management, air protection, rational water use, biodiversity conservation, and climate change mitigation measures.

Health care



The main direction includes providing medical institutions with the necessary equipment that helps save people's lives and health, as well as improve their quality of life.

Help for children

Key areas include helping children affected by war, supporting children from orphanages and boarding schools, and teaching children important issues and topics that will help them in adult life.

Rehabilitation and reintegration of veterans, post-war recovery

The main direction includes helping veterans who defended the sovereignty of Ukraine return to a quality life and fully realize their capabilities and ambitions.



OBU strives to demonstrate its contribution to achieving the Sustainable Development Goals, and therefore each area of charity corresponds to the country's efforts through the **nationally defined SDGs and their indicators**:

Environmental protection



Health care



Help for children



Rehabilitation and reintegration of veterans, post-war recovery



Responsible social actor (1/2)

2025 Achievements



2026 Plans

Charity Projects and Funds

- [OTP Bank Helps Ukraine](#) project: main goal – to raise funds for the urgent needs of the country during martial law. Six charity initiatives have been implemented within the project during the year (jointly with the charity fund «Blagomay»);
- Assistance to Superhumans Center: charitable contributions for prosthetics and rehabilitation of those who suffered from the war;
- Assistance to DrukArmiia: charitable contributions for plastic to produce 3D printed products, both souvenirs, which are sold for donations at business, charitable and specialized technical events, and educational models for the defenders of the Defense Forces of Ukraine, which help them save lives and health;
- Large-scale charity campaigns: in August, to mark the 34th anniversary of Ukraine's independence, the Bank, together with the Serhiy Prytula Foundation, held an online auction "Free Sky at 34" and raised UAH **1.8** million to support defense capabilities; in December, together with the Superhumans Center the Bank organized an auction "Christmas for Supers", the results of which were allocated UAH **4.5** million for the rehabilitation and prosthetics of wounded Ukrainians;
- In 2025, the Bank allocated **72.7** million UAH to charity.

- Implementation of new OTP Bank Helps Ukraine projects (jointly with the charity fund "Blagomay");
- Further cooperation with charitable foundations.

Healthcare

- Blood donation: the Bank, together with the organization DonorUA, held three blood donation events — in February, June, and September. **97** employees participated in the Donor Days at the Bank's HQ, collecting a total of **48.5** liters of blood.;
- Bank's employees took part in 3 first aid courses in Kyiv (jointly with Rhythm organization): 2 of them were dedicated to stopping bleeds, 1 to developing skills in cardiopulmonary resuscitation (CPR). Generally, **60** persons completed trainings in April, August, November.

- Organizing blood donations of Bank's employees;
- First aid courses in Kyiv (jointly with Rhythm organization).

Education

- 2 lectures on risks in the banking system and sustainable development of the banking system were held for students of the departments of "Economics", "Finance" and "Ecology" at the National University of "Kyiv-Mohyla Academy";
- 4 lectures were held at the college at the Kyiv Institute of Business and Technology on risks, banking, and big data.

- Continuing cooperation with universities to increase student awareness of sustainable development.

Responsible social actor (2/2)

2025 Achievements



2026 Plans

Children

- [OTP Bank Helps Ukraine](#) supported renovation of a center in the Chernihiv region - the Udaytsi Educational and Rehabilitation Center to provide a more comfortable and welcoming environment for **65** children. Within the project, old wooden windows were replaced with modern double-glazed ones, new interior doors were installed, ceiling, floor, bathrooms were painted;
- Constructed a sport playground for the Stryzhavka orphanage;
- Replaced windows in the medical station of Mostyshche special school;
- Organized rest and recovery at the OTP Kids Camp camp (5 rotations) in Budapest for **200** children;
- Vyshyvankas were bought for over **550** children from orphanages.

- Further collection of funds to help children, orphanages, children's hospitals.

Environmental protection

- Used batteries of various types were collected in 20 branches for recycling as part of the green project. During 2025, the Bank collected and sent for recycling about **120** kg of used batteries;
- OTP BANK continues to transition to digitalized electronic document management to reduce resource usage, including paper and cartridges. In the reporting year, **728** fewer packs of paper were purchased for the Bank's Head Office compared to 2024.

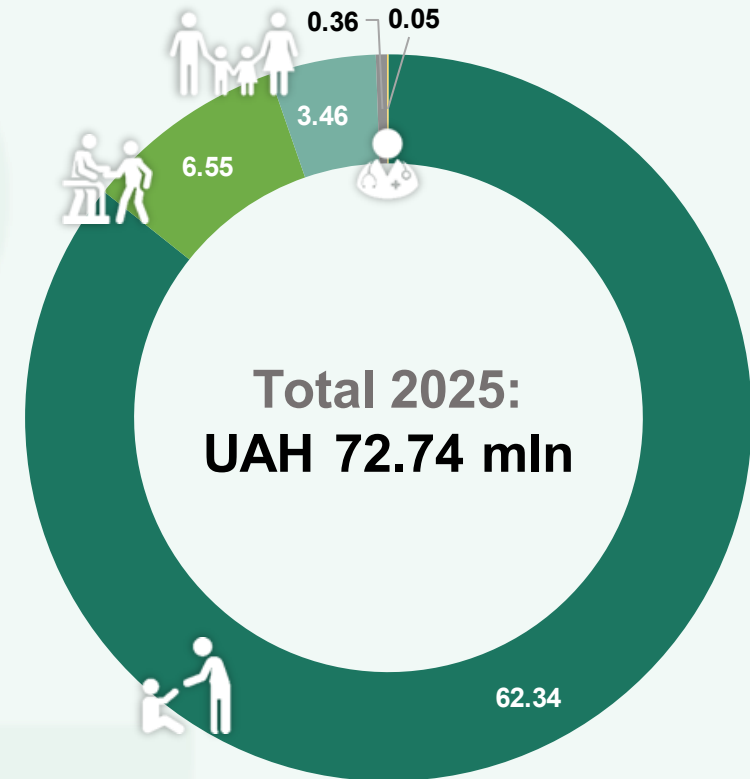
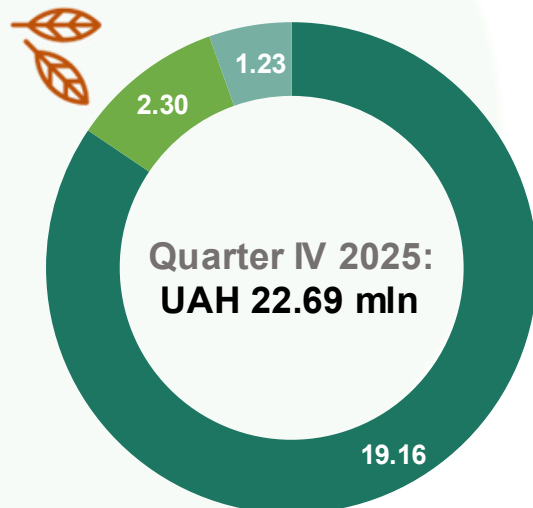
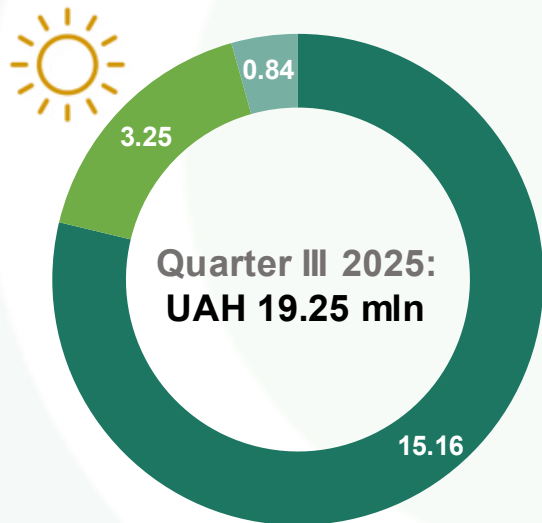
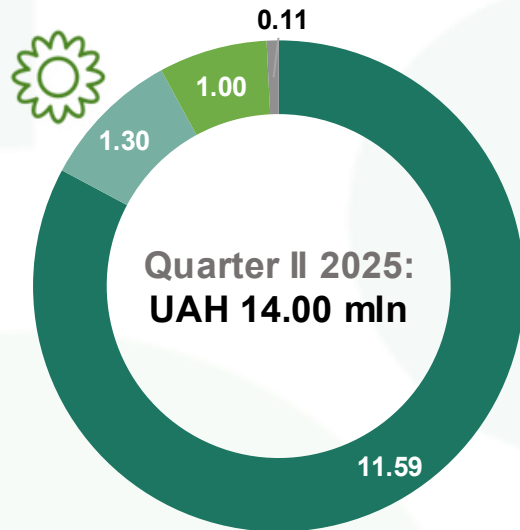
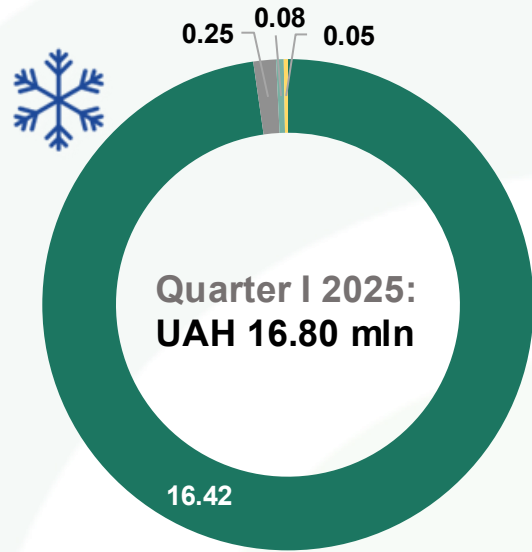
- Collection of used batteries in Bank's network branch;
- Installation of solar power plants in three branches in the cities of Chernivtsi, Vinnytsia, and Uzhhorod.

Social initiatives and culture

- Bank supported initiatives and projects, carried out by the Embassy of the Republic of Hungary. Namely cultural event for Easter fest and art lesson for Ukrainian children in St. Sophia Cathedral in Kyiv (creating of Easter eggs, excursion);
- Restored painting by Jan Baptist presented at the Khanenko Museum with the support of OTP Group in Ukraine.

- Supporting of initiatives and projects in the direction of cultural development, carried out by the Embassy of the Republic of Hungary.

Responsible social actor: volume of direct charity in 2025



- Social Projects
- Veteran Rehabilitation
- Help for Children
- Health care
- Environmental Protection

Responsible employer

2025 Achievements



2026 Plans

Health marathon

- **16,2 mln UAH** was returned under the cashback program for purchases at the pharmacy for **72,2%** of employees;
- **11** lectures on mental and physical health were held;
- **75** articles were written in OTP Digest;
- The medical examination was conducted in Kyiv and other regions of Ukraine (Dnipro, Odesa, Kharkiv). The number of employees who completed the medical examination is **466**.

- It is planned to continue the return for cashback employees for purchases in pharmacies;
- It is planned to continue educational initiatives with lectures and articles.

Sport

- Employees took part in the "Kyiv Sotka" cycle marathon at distances of 100 km and the Kyiv Marathon of Invincibility at distances of 21 km;
- Step to the goal "10,000 steps" – **158** people joined;
- H2OK Daily Hydration – **69** people joined;
- Step UP – **36** people joined;
- VeloGO (bike ride) - **28** people joined;
- RUN & WIN – **38** people joined;
- SUGAR-FREE in 'BetterMe' - **200** people joined;
- Step to the goal 2.0 "10,000 steps" – **89** people joined;
- Dance challenge in 'BetterMe' - **200** people joined.

- It is planned to continue engaging employees in various types of physical activities, marathons and mental health support events.

Psychological support for employees

- During 2025, **949** consultations were held for **157** OTP BANK employees, 96% of which were consultations with professional psychologists and coaches.

- It is planned to continue the psychological support program.

Corporate activities

- OTP Bank has reading and cinema clubs that are held every three weeks in turn and in which all interested employees can join;
- Theatre community: "OTP Bank obsessed with the theatre fire" currently includes **276** members. Two theatrical events have already been officially held;
- Successful delivery of **5** training cohorts for Middle Managers (average rating 9/10). A total of 95 managers completed the program "Leading in Uncertainty";
- Demo Day. **3** events with an average rating **9,8** and invited external speakers;
- Leadership Program for IT – **12** modules of training and a graduation event;
- Delivered **3** business simulation sessions for different units;
- Organized and delivered **2** workshops for the Risk team: "Control Function in Management" and "Team Communication";
- Organization of an OTP Charity Market 2025.

- It is planned to continue holding a reading and film club;
- It is planned to hold theatrical events.

Responsible service provider

2025 Achievements



2026 Plans

Financial literacy

- In March, OTP Bank employees held financial literacy classes for almost **700** pupils in **29** cities and towns;
- Bank specialists prepared their own financial literacy materials for the Bank's pages in social media, featuring a west highland white terrier named **Baxyk** as the main character. He talks about fraudsters' "tricks" and provides a practical financial security checklist. Baxyk also shares financial life hacks, explains various banking products and how to use them — such as loans, deposits, and installment plans.



- Further financial literacy publications on the Bank's pages in social media;
- Financial literacy publications on the Bank's web-page (about products).

Accessibility

- The service provider regarding the accessibility of the Bank's branches to people with disabilities conducted a inspection of the 14th branch and provided reports with recommendations on bringing them into compliance;
- **19** branches in Kyiv have been updated and brought into compliance;
- **167** Bank ATMs with Braille lettering and accessible for people with visual impairments.

- It is planned to carry out a technical inspection with the receipt of a report and recommendations on bringing it into line at **12** branches of the Bank;
- Carrying out complex works in **15** branches of the Bank across Ukraine.

Fair treatment of customers

- Updated the categorization of the customers' complaints
- Developed mapping of the complaints on the product groups of the Bank
- Installed monitoring of the customers' complaint related to the conduct risk of the Bank's employees

- To review and optimize the refund process related to customers' complaints.

An aerial photograph of a dense green forest. A two-lane road with white lane markings curves through the forest from the bottom center towards the top right. A small white car is visible on the road. A semi-transparent green circular highlight is placed over a section of the forest on the left side of the road. The entire image is framed by a white border with a dark green, irregular outline.

Executive Summary / Conclusion

8

ESG Strategy summary for 2026

OBU strives to build a clear, transparent and effective Environmental and Social Management System (ESMS)

OBU strategic targets are aimed both at improving the Bank's ESMS and at helping Ukraine achieve nationally defined Sustainable Development Goals

Strengthen transparency, financial literacy, and inclusive access to banking services through targeted communication and digital content initiatives. Enhance social impact by supporting employee well-being, education partnerships, veteran reintegration, and community engagement programs, while promoting ESG principles in brand and outreach activities.

**Social
responsibility**

**Environmental
responsibility**

Integrate climate considerations into business activities by establishing processes for collecting and analyzing Scope 3 emissions data for carbon-intensive borrowers. Advance the Bank's decarbonization efforts through the development of an internal transition plan and implementation of renewable energy solutions within its operations.

Enhance ESG awareness and competencies by regularly updating training programs, aligning them with group-level standards, and ensuring targeted employee coverage. Strengthen ESG communication through structured internal and external engagement, including dedicated awareness campaigns and content initiatives.

**ESG training
& increase
of ESG
awareness**

**Green
loan book**

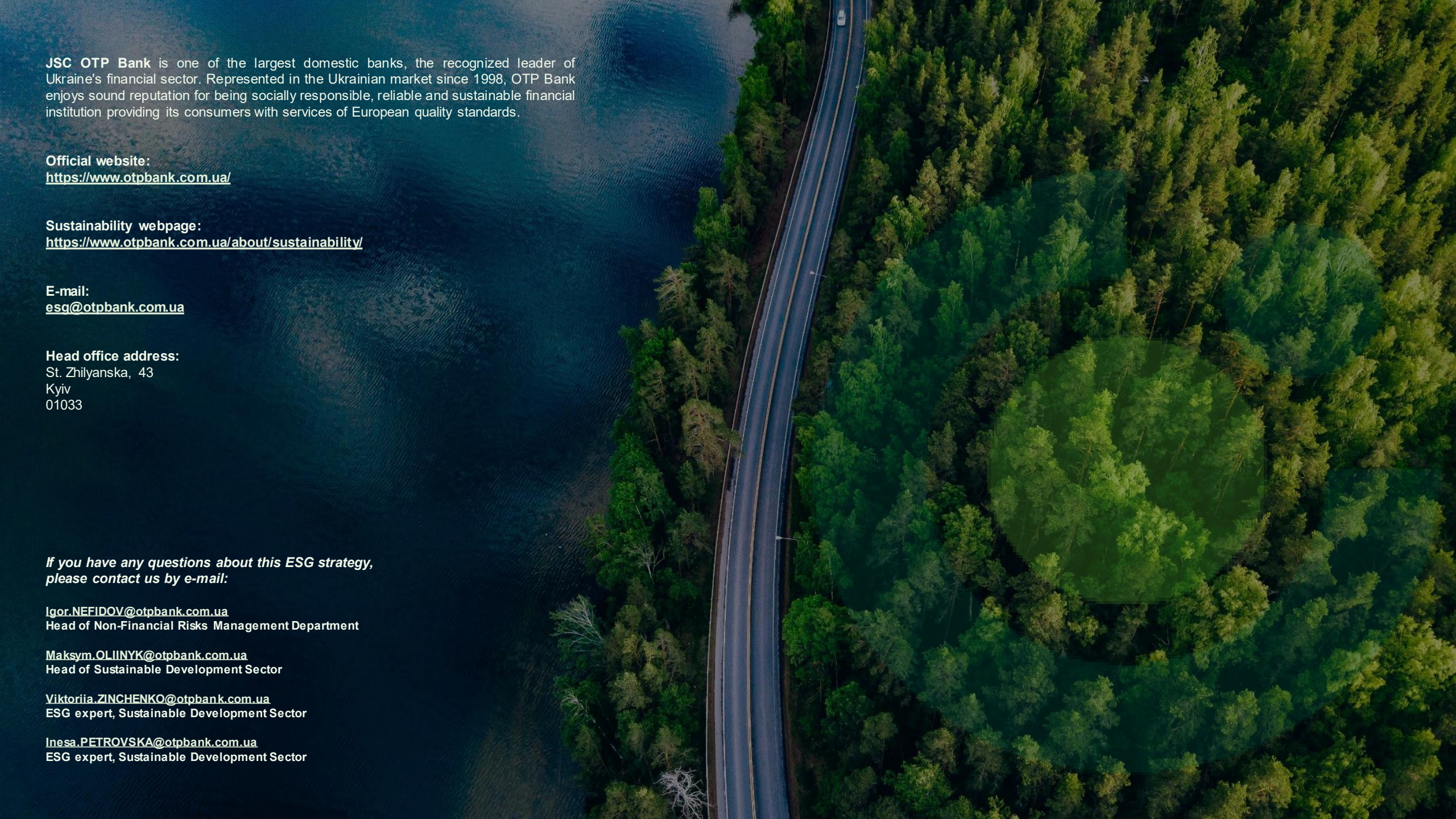
Integrate ESG principles into product development and portfolio management by aligning green products with eligible requirements and strengthening internal classification and labelling practices. Expand sustainable financing capabilities through dedicated frameworks, partnerships with international institutions, and consistent monitoring and reporting of green asset performance.

Integrate ESG and climate factors across all key risk processes, including operational risk, credit assessment, supplier due diligence, and portfolio monitoring. Establish comprehensive methodologies for identifying, assessing, and managing ESG and climate risks, including physical and transition exposures, supported by systematic data analysis, risk mapping, and regular reporting.

**ESG risk
management**

**ESMS
administration**

Strengthen the ESG management framework by standardizing approaches to sustainability reporting, ESG assessments, and the classification of sustainable products. Ensure high quality, independent verification, and transparency of non-financial and publicly disclosed ESG data in line with international standards, while reinforcing the integration of ESG principles into corporate governance.



JSC OTP Bank is one of the largest domestic banks, the recognized leader of Ukraine's financial sector. Represented in the Ukrainian market since 1998, OTP Bank enjoys sound reputation for being socially responsible, reliable and sustainable financial institution providing its consumers with services of European quality standards.

Official website:

<https://www.otpbank.com.ua/>

Sustainability webpage:

<https://www.otpbank.com.ua/about/sustainability/>

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