

SOCIAL MEDIA POLICY

1. Purpose and scope of the regulation

JSC OTP BANK ('OTP Bank' or 'Bank') encourages the organisations, managers and employees of OTP Group to use social media actively in order to promote the Bank's local, national and international reputation and to communicate with existing and future clients, employees and other key players. Social media is a collective term for websites and applications that focus on communication, community-based interaction, content sharing and collaboration.

When used responsibly, social media sites provide an effective tool to promote the Bank and to share news and information about the Bank and its services.

The purpose of the Policy is to define the rules for using OTP Bank's own social media platforms and to facilitate OTP Bank's transparent, uniform and brand-conform communication. The Policy is applicable to OTP Bank's managers and employees who are in charge of managing OTP Bank's official social media platforms or officially represent OTP Bank in social media.

In addition, the Policy is intended to give guidelines to employees for the use of social media sites whether for professional or private purposes, whereby it protects the reputation of both the employee and the Bank, and the OTP brand.

The Policy provides guidance to all employees of OTP Banking Group for the ethical use of social media in order to protect the reputation of the employee and the Bank and the OTP brand itself. Rules pertaining to one's behaviour in social media cover both personal and professional communication. This Policy provides guidance for the interpretation and practical use of the principles set out in OTP's Code of Ethics.

2. Principles of the Bank's social media communication

2.1. Uniform treatment of the social media platforms used by OTP Bank

OTP Bank strives to establish uniform communication on the Bank's social media platforms. Without the approval, OTP Bank employees may not register on behalf of OTP Bank and may not create a profile on behalf of OTP Bank or any of its Subsidiaries or internal organisational units on any social media platform.

OTP Bank ensures that its own social media sites are constantly up-to-date by updating the contents regularly, by continuously moderating comments and by providing timely replies to questions.

All contents published on any social media platform of OTP Bank are considered the intellectual property of OTP Bank.

2.2. Fundamental requirements of OTP Bank's own contents

In publishing any content on its social media sites, OTP Bank always considers the public nature and long-term lifecycle of the comments.

OTP Bank strives to engage in fair, honest and transparent communication; the contents always comply with the Code of Ethics, they do not violate personality rights or business secrets and banking secrecy, and do not constitute political statements.

In accordance with the relevant procedures, Bank's Compliance Unit reviews the consumer protection compliance of any content that constitutes commercial communication.

The content of the posts is always aligned with the brand of OTP Bank, logos and brand elements displayed on the social media platform comply with the Bank's Corporate Identity Manual, and all contents are legitimate or freely usable.

2.3. Statement order

Declarations on behalf of OTP Bank may only be issued by authorised employees.

OTP Bank's news may also be shared by employees (only by repost) but only after the communication on the official social media platform or publication of any executive communication.

In crisis situations or in the event of a systemic problem involving the activity of OTP Group, all employees of OTP Group are barred from making any statements, including responding to inquiries received on social media.

2.4. Managing and moderating the social media platforms of OTP Bank

The policy posted on OTP Bank's Facebook profile is applicable to all visitors of OTP Bank's social media sites and are mandatory for all users.

Bank's Marketing Unit employees monitor the comments posted on social media sites continuously to make certain that none of the potentially arising problems remains unresolved. When specific complaints or negative comments are posted on the social media sites of OTP Bank, Bank's Marketing Unit employees strive to pass the issue to a competent expert and to respond within a reasonable time limit.

The contents of direct messages sent on the social media sites of OTP Bank are considered information disclosed on behalf of OTP Bank; they comply with the requirements set out in the Code of Ethics both in terms of form and tone.

2.5. Commercial communication of intermediaries

OTP Bank pays special attention to ensuring that the partners intermediating its services fully comply with consumer protection rules and the provisions of OTP Bank's Code of Ethics in the case of all marketing materials related to the products and services of OTP Group, including social media contents.

2.6. Partnerships

Likewise, in the case of its partnerships established for commercial purposes, OTP Bank pays special attention to enforcing consumer protection rules and the provisions of OTP Bank's Code of Ethics. In accordance with the current legislation and NBU recommendations, OTP Bank requires its cooperating partners to transparently indicate that the publication of the content was supported by OTP Bank, and to present an accurate, fair and credible view of the products and services of OTP Bank.

OTP Bank monitors the social media appearances of its cooperating partners continuously to verify that they comply with the principles of fair commercial communication and the provisions of OTP Bank's Code of Ethics.

3. Guidelines on the use of social media by employees

3.1. Separation of personal and professional opinions

Employees may, at their discretion, indicate their workplace and their job in their social media profiles. If they decide to do so, however, OTP Bank expects its employees to ensure that the information is always accurate and up-to-date. If the employee's personal profile includes OTP Bank or any other member of the OTP Group, he or she is required to exercise special caution in respect of the contents: even the employee's private opinion, post or comment may have an impact on the reputation of OTP Bank.

OTP Bank expects its employees to use first person singular in any comments made in social media, thereby indicating that they are expressing their personal opinion. As regards comments made in relation to OTP Bank, we recommend that they clearly insert in their personal profile a statement to the effect that 'Any text made public via [xy blog/channel] represents my personal opinion and does not reflect the official view of OTP Bank'.

3.2. Be open and polite, build solid professional relationships

In relation to social media posts, contents and opinions of a professional nature, OTP Bank recommends that all employees consider the following aspects:

- Stick to your own professional area and write only about topics that you know well.
- Specify your sources and double-check any information before posting it.
- Be honest; never make misleading or untrue statements about your activities or achievements at OTP Bank.
- If you were mistaken, correct the mistake immediately and indicate the correction clearly.
- Be polite; respect your former and current co-workers, your employer, as well as the partners and competitors of OTP Bank.

In respect of news or contents pertaining to OTP Bank or any other member of OTP Group, OTP Bank requires its employees to refrain from posting confidential business information before the official or executive communication of OTP Bank is released.

When sharing the post of another OTP employee, take special care to respect intellectual property and to indicate the source precisely.

3.3. Be responsible – Comply with the Code of Ethics

During their appearances in social media, our employees should refrain from any communication that may be detrimental to the Bank's reputation. Even when communicating in social media as a private individual, the Bank expects its employees to behave in a manner befitting and conforming to the Bank's ethical standards, especially if their person or their activity may be connected to the Bank in any way or may make it appear as though they act or express an opinion on behalf of the Bank.

Accordingly, in respect of any activity in social media, OTP Bank wishes to call the attention of its employees to the following requirements laid down in the Code of Ethics:

- Respect the religious beliefs, national and ethnic origin, sexual orientation, political and philosophical views of others.
- Refrain from racist or hate speech or the sharing of contents suitable to incite racism or hatred, and from the publication of unlawful materials or materials that encourage others to engage in unlawful activities. Refrain, in particular, from actions subject to the criminal Code: incitement against a community, open denial of Nazi crimes and communist crimes, blasphemy of a national symbol, use of symbols of Totalitarianism, incitement against a decree of authority, fearmongering, threat of public endangerment.
- In social media refrain from vulgar, degrading, defaming, slandering or desecrating expressions, and do not publish a false sound or video recording that is suitable to harm the reputation of others. Moreover, avoid all hurtful or overly personal comments. Be aware that a comment may be perceived as acceptable or even funny by some and hurtful by others.
- In addition, refrain from using the name of OTP Bank in order to promote or advocate any product, issue, religious belief, political party, candidate, etc.

3.4. Protect the Bank's confidential information and good reputation

It is a key task of the Bank's employees to continuously keep in mind the Bank's business interests and reputation. Accordingly, they may not publish, either during professional or personal communications, the contents listed below:

- Banking secrecy (any fact, information, solution or data in the financial institution's possession on clients relating to the client's identity, financial standing, the balance

and turnover of his or her account held with the financial institution as well as to his or her contracts entered into with the financial institution);

- Business secret, know-how (any fact, information or other data connected to an economic activity or an assembly thereof which is secret – in the sense that it is not, as a body or as the assembly of its components, generally known or readily accessible – [and, as such, possesses pecuniary value], and the non-disclosure of which is the Bank's fundamental interest); thus, in particular:
 - confidential financial or operational information, information relating to the Bank's financial performance, revenues or share prices, and any other information that may influence the price of the Company's stock on the stock exchange;
 - information on contracted partners and suppliers;
 - strategic plans, acquisitions, products and services to be introduced in the future;
 - legal matters, litigations or comments on a topic related to a party against which a lawsuit involving the Company may be pending;
 - information on a crisis situation;
- Unlicensed contents violating copyrights or intellectual property;
- Personal data, contents violating rights relating to personality (confidential, protected or contradictory information on the Bank, information of a private nature on the Bank's clients, or current or former employees and managers).

3.5. When in doubt, ask!

All posts and contents published in social media can be retrieved, disseminated or preserved either as a screenshot or in any other format irrespective of the data protection settings used by the owner of the profile.

To protect its reputation and business interests, OTP Bank may monitor any social media content and information posted by the employees of OTP Bank.

Therefore, OTP Bank recommends that its employees refrain from posting any social media content or opinion relating to OTP Bank unless they have fully ascertained, prior to publication, that the content or opinion complies with the provisions of this Policy and the Code of Ethics.

OTP Bank provides continuous assistance and support to its employees for consultation in relation to social media contents and the handling of sensitive issues or negative comments during the use of social media.

Bank's Compliance Unit is available at compliance@otpbank.com.ua to receive notifications from employees should they detect any behaviour or content in social media that violate the provisions of this Policy or the Code of Ethics. OTP Bank investigates all notifications and concerns submitted in relation to social media content.

The violation of the Code of Ethics during the use of social media platforms may result in consequences under labour law or criminal law. Any content during the use of social media that jeopardises OTP Bank's reputation or the security of its business operations, or infringes on the ethical principles and/or is unlawful or violates the Bank's regulations or policies may result in disciplinary action, including termination.