

Responsible Banking Progress Statement for PRB Signatories

Summary template

OTP BANKA d.d. 2025

Principle 1: Alignment

OTP banka d.d. is a commercial bank operating across Slovenia and the core entity of OTP Group Slovenia, serving households and business clients through an omnichannel model (branches, post offices, and digital channels). Our business model combines retail and corporate banking with financial markets activities, complemented by leasing and factoring provided through subsidiaries (OTP faktoring, SKB Leasing and SKB Leasing Select).

Our sustainability approach is integrated into our business strategy and is reflected in our **Sustainability Strategy**, updated early 2026.

The updated strategy aligns our priorities with material topics identified as part of the Group's Double Materiality Assessment (DMA) process and focuses on: (i) financing the transition to a low-carbon economy and strengthening portfolio resilience, (ii) maintaining social responsibility and customer protection, and (iii) upholding high governance and compliance standards. In doing so, we support EU and Slovenia's decarbonisation trajectory and embed ESG principles into sustainable financing, risk management, own operations, people practices, and ethical conduct.

Principle 2: Impact & Target Setting

OTP banka d.d. applies a Group led approach to impact analysis and target setting through OTP Bank Plc.'s **CSRD/ESRS Sustainability Statement** published within the consolidated Management Report, which covers OTP Bank Plc. and its subsidiaries (including OTP banka d.d.) and is subject to limited assurance. The double materiality assessment (DMA) is conducted at Group level; however, OTP banka d.d. contributes through a structured local validation process involving internal experts across key functions (e.g., Risk, Compliance, HR and Marketing), ensuring that local perspectives are reflected. OTP banka d.d. contributes local portfolio data and qualitative inputs, so domestic impacts and stakeholder expectations are reflected in Group priorities and disclosures. Geographic context is further incorporated through a Business Environment Scan (2024), including a socio economic needs assessment for Slovenia, complemented by external tools (e.g., ENCORE).

Principle 3: Clients & Customers

OTP banka d.d. works responsibly with clients and customers through a set of internal policies and processes, including the **Code of Ethics, Compliance Policy**, and the **Consumer Protection Compliance Programme**. Our customer approach is "Customer First": we aim to build long-term relationships by tailoring solutions to customer needs, ensuring transparent communication, and continuously improving customer experience.

In line with the relevant EBA guidelines and CRD6, the Bank prepared its **prudential transition plan** to strengthen its resilience to climate and environmental risks. For certain corporate portfolios, the plan introduces a **client climate engagement assessment** for sectors most exposed to transition risk, enabling structured dialogue with clients to better understand and, where appropriate, facilitate their transition efforts; implementation started in **2026**.

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| | <p>The consolidated DMA identifies and validates the Group's priority impact areas, which are cascaded into local targets and action/transition plans and embedded in our updated Sustainability Strategy; our material topics/priorities are Climate change (E1) (adaptation, mitigation and energy), Own employees (S1) (working conditions; equal opportunity), Consumers and end-users (S4) (information related impacts incl. data privacy/cybersecurity and customer information), and Business conduct (G1) (ethics incl. AML/CFT).</p> <p>To deliver on these priorities, OTP banka d.d. maintains an ESG KPI dashboard with defined governance and monitoring rules. Under the updated Sustainability Strategy, targets are set for 2028 with interim targets for 2026, including (i) a green financing target and (ii) financed GHG emission intensity targets. In addition, the Group's prudential transition plan introduced a client climate engagement assessment for sectors most exposed to transition risk. We also maintain an exclusion list as a policy guardrail, assuming no new exposure to environmentally or socially harmful activities.</p> | <p>We also identify business opportunities linked to increasing positive impacts and reducing negative impacts. We offer sustainable financing solutions for households (green mobility, energy efficiency, and preferential mortgage pricing for energy efficient real estate) and for corporates (energy efficient buildings, renewable energy and clean transport), aligned with OTP Group's Sustainable Finance Framework and the Hungarian central bank's Green Capital Relief Programme.</p> |
| <p>Links & references</p> <ul style="list-style-type: none"> • Annual report 2025 of OTP Group Slovenia and OTP banka d.d., p. 8-79 • Disclosures (under Pillar 3) 2025, p. 182-202 • OTP bank Plc. Integrated Annual Report 2025, p. 86 - 356 | <p>Links & references</p> <ul style="list-style-type: none"> • Disclosures (under Pillar 3) 2025, p. 182-202 • OTP bank Plc. Integrated Annual Report 2025, p. 86 - 356 | <p>Links & references</p> <ul style="list-style-type: none"> • Disclosures (under Pillar 3) 2025, p. 182-202 • Code of Ethics of OTP Group Slovenia and OTP banka d.d. • Compliance Policy of OTP Group Slovenia and OTP banka d.d. • Sustainable loans OTP banka • OTP Group - Green transition and sustainable finance • Sustainable Finance Framework |

Principle 4: Stakeholders

OTP banka d.d. is included in the OTP Group perimeter covered by consolidated **CSRD/ESRS** reporting. Our local stakeholder inputs feed into the Group's **Double Materiality Assessment (DMA)** and related governance processes, ensuring Slovenian market expectations and regulatory specifics are reflected in the Group's material topics, priorities, and disclosures.

Principle 5: Governance & Culture

OTP banka d.d. implements a **two-tier ESG governance model**: the **CX & ESG Committee** (Management Board level) provides strategic oversight of Sustainability Strategy implementation and ESG risks/opportunities, while the **Climate Change & Sustainability Committee** drives day-to-day execution, monitors targets and regulatory expectations, and escalates key matters to CX & ESG Committee. ESG coordination is centralized in the **Corporate Strategy and Transformation Sector** within a dedicated Sustainability Center of Excellence team.

We promote a responsible-banking culture anchored in our **Code of Ethics**. After refreshing our vision, values and target behaviours in 2025, we are embedding clear behavioural expectations across the employee lifecycle in 2026, strengthening leadership standards, consistently applying DEIB principles, and developing an early-career talent pipeline. We support this with ESG training to equip employees to apply ESG and consumer-protection requirements in day-to-day decisions and escalation. Our remuneration framework reinforces these expectations by linking variable pay to performance criteria aligned with Group strategic objectives, with **ESG targets included in scorecards for all employees (including Management Board members)** and directly influencing variable remuneration.

Our Social Responsibility priority is implemented through CSR activities (financial literacy programmes, anti fraud awareness, volunteering, sponsorships and donations) and complemented by biodiversity initiatives such as urban beehives on our business premises, contributing to financial inclusion, education, community resilience, and biodiversity awareness. Employee participation in these programmes further reinforces responsible banking culture and connection with local communities.

Principle 6: Transparency & Accountability

OTP banka d.d. reports sustainability information through OTP Bank Plc.'s consolidated **CSRD/ESRS Sustainability Statement**, which covers OTP Bank Plc. and its subsidiaries (including OTP banka d.d.) and is subject to **limited assurance**. We use this consolidated reporting (incl. the Group's DMA and related disclosures) as the primary public reference base for PRB implementation progress.

Assurance of the sustainability related information in this PRB report has not been undertaken.

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| | <p>ESG risks (including climate and environmental risks) are systematically integrated into the Bank's risk management framework, including credit risk processes and internal capital and liquidity adequacy assessments. A dedicated methodology supports identification and assessment of physical and transition risks across relevant time horizons, while ESG due diligence is embedded in lending through client data collection, ESG scoring, and risk based decision making, including the application of exclusion lists and escalation mechanisms. The prudential transition plan further strengthens this framework by introducing structured client climate engagement and portfolio level steering to enhance resilience to transition risks.</p> | |
| <p>Links & references</p> <ul style="list-style-type: none"> • OTP bank Plc. Integrated Annual Report 2025, p. 86 - 356 | <p>Links & references</p> <ul style="list-style-type: none"> • Disclosures (under Pillar 3) 2025, p. 182-202 • Code of Ethics of OTP Group Slovenia and OTP banka d.d. | <p>Links & references</p> <ul style="list-style-type: none"> • OTP bank Plc. Integrated Annual Report 2025, p. 350 |

Supplement templates

Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

Business model

Describe (high-level) your bank's business model, including the main business lines, customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, business areas or by disclosing the number of customers and clients served.

Links & references

- [Annual report 2025 of OTP Group Slovenia and OTP banka d.d., p. 8-79](#)

Response

Who we are and where we operate

OTP banka d.d. is a commercial bank operating across Slovenia, formed in 2024 through the legal merger of Nova KBM d.d. and SKB banka d.d. (22 August 2024) with full operational integration completed in September 2024. The bank is the core entity of OTP Group Slovenia, alongside financial subsidiaries SKB Leasing d.o.o., SKB Leasing Select d.o.o. and OTP faktoring d.o.o.. The bank serves the domestic market through an extensive network of branches and digital channels. OTP banka d.d. is a part of OTP Group (OTP Bank Plc), the bank benefits from regional capabilities and expertise within a CEE banking group.

Scale and footprint (31 Dec 2025)

- Total assets: €15.4bn.
- Branches: 71.
- Employees: 2,125.

Customer segments and portfolio composition (31 Dec 2025)

- The bank serves households (retail) and business clients (corporates, SMEs, public sector and financial institutions primarily via corporate and treasury lines).
- Loans to the non-banking sector: €7.6bn total; €3.9bn (52%) to legal entities and entrepreneurs, €3.7bn (48%) to households.
- Deposits from the non-banking sector: €12.3bn total; €8.7bn (71%) households, €3.6bn (29%) legal entities and entrepreneurs.

Core business lines and products

- Retail Banking: Our largest revenue segment serves approximately **700,000** customers via **an omnichannel network of 71 branches, 454 post offices, and digital channels**, tailoring the proposition to diverse needs. We operate three segments—**Private/Premium, Mass Retail** (with a special focus on youth), and **Micro-enterprises**—offering a full suite of **transaction accounts, savings, cards, consumer and housing loans (incl. micro-loans), brokerage**, and selected third-party products (**insurance, mutual funds**).
- Corporate/SME Banking: We provide end-to-end services to business customers, from business accounts, deposits, and domestic/international payments to the full loan spectrum (overdrafts, working-capital, and medium-/long-term investment loans), complemented by subsidiaries solutions in **leasing and factoring, bank guarantees, and documentary/trade finance**. We **embed ESG** in client assessments and actively finance transition needs—initially prioritizing **renewable energy** and **e-mobility**—and we partner with the **Slovenian Enterprise Fund** to expand SME access to fixed-asset and medium-term working-capital financing. The division comprises **Key Clients** (large corporates, public sector, project/structured finance), **SME** (three regions plus a specialized agriculture team), and **Sales Support & Business Development** (incl. documentary business).
- Asset and Liability management: We actively manage the bank's **liquidity, interest rate, and currency** positions in line with the macroeconomic environment and market expectations. Financial markets: We are a leading participant in domestic and regional debt markets, serving as primary dealer for Slovenian government bonds and treasury bills and as an official liquidity provider on MTS Slovenia and the Ljubljana Stock Exchange, with growing turnover and client activity across primary and secondary markets. In 2025, we supported the successful issuance of the second retail bond (RS96) and secured mandates to arrange new 30-year government bonds and new green bonds linked to sustainability targets.

- Custody and administrative service: We provide custody services for investment and pension funds and administrative services for mutual and alternative funds, serving domestic and foreign institutional investors and supporting fund management companies.

Strategy alignment

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and other international frameworks such as the Kunming-Montreal Global Biodiversity Framework (GBF),

the United Nations Guiding Principles on Business and Human Right (UNGPs), the forthcoming instrument on plastic pollution etc.

Include any other national and/or regional frameworks that your bank has a strategy to align with where relevant.

Links & references

- [Disclosures \(under Pillar 3\) 2025, p. 182-202](#)
- [OTP bank Plc. Integrated Annual Report 2025, p. 86 - 356](#)

Response

The Sustainability Strategy is embedded within the bank's broader business context, defined by the Strategy 2030 – our long-term direction toward a digital and frictionless banking, focused on long-term value creation. It represents the strategic framework for the bank's comprehensive transformation and clearly articulates our ambition to build an agile, data-driven, and customer-centric organization. Within this framework, sustainability plays a key role as an integral part of business decision-making, product development, and the management of impacts on society and the environment.

In Q1 2026, based on the Business Strategy, the C&E risk materiality assessment, the Business environment scan performed at the end of 2024 and the Double Materiality Assessment of OTP Group, OTP banka d.d. has updated its **Sustainability strategy**. The new strategy closely follows the directions laid down in the previous 2023 ESG strategy, representing its decisive and responsible answer to increasingly urgent questions as to what type of world we want to live in and leave for future generations. Our strategy is based on forward-looking ESG principles that among other topics cover:

- the Bank's commitment to finance the transition towards a low-carbon economy and adapt its investment and loan portfolio to one which is aligned with the decarbonization efforts of Slovenia and the EU,
- the intention to remain a socially responsible institution contributing to the development of the broader social and economic environment,
- and to meet the highest corporate governance and compliance standards.

OTP banka d.d. operates in an EU Member State. The EU is committed to a reduction of 55% in its GHG emissions from 1990 levels by 2030. The European Green Deal has committed to making Europe a climate neutral continent by 2050. Slovenia has made its own commitments in support of the EU's binding commitments (the updated Integrated National Energy and Climate Plan of Slovenia has been adopted in December 2024).

Key initiatives defined under the Sustainability strategy are as follows:

1. Environmentally sustainable growth

- Sustainable financing – expand green lending in the corporate, retail and leasing portfolio
- Portfolio resilience – C&E risk framework – Implement and gradually upgrade the transition plan, enhance the physical risk assessment methodology
- Sustainable operations – reduce our environmental impact: decrease GHG emissions from our own operations – with focus on energy efficiency of our business premises and car fleet

2. Social sustainability

- Social responsibility – introduce financial and digital inclusion programs for vulnerable client segments, support consumer protection and fraud risk awareness initiatives, promote corporate citizenship through employee volunteering, sponsorships, and philanthropic donations
- Corporate culture, employee well-being and diversity – ensure equal opportunities to all employees, incl. pay transparency, support initiatives ensuring employee well-being (employee satisfaction and engagement) and talent development, continuous learning

3. Governance

- Ethical and transparent operations – ensure business is done with integrity, responsible conduct and in a transparent manner, in line with the Code of Ethics of the Group
- Regulatory compliance and reporting – ensure transparency through disclosure and reporting obligations, maintain compliance with regulatory requirements on ESG risk management, disclosures and other relevant legislation.

Principle 2: Impact & Target Setting

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

Impact Analysis

Show how your bank has identified, prioritized and measured the most significant impacts associated with its portfolio (both positive and negative). Determine the priority areas for target- setting. Include details regarding: Scope, Portfolio Composition, Context, and Performance Measurement.

The impact analysis should include assessment of the relevance of the four priorities laid out in [Leading the Way to a Sustainable Future: Priorities for a Global Responsible Banking Sector](#), as part of its initial or ongoing impact analysis.

Links & references

- [OTP bank Plc. Integrated Annual Report 2025, p. 86 - 356](#)

Response

OTP Bank Plc publishes its consolidated level Sustainability Statement within the consolidated Management Report. OTP Group's Sustainability report is prepared in alignment with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), including disclosures under Article 8 of EU Regulation 2020/852. Disclosures in the Sustainability Statement involve OTP Bank Plc and its subsidiaries, including OTP banka d.d. The Sustainability Statement is subject to **limited assurance**.

OTP Group has performed a revised **double materiality assessment (DMA)** for FY25, covering all subsidiaries within the Group, including OTP banka d.d. (OTP Slovenija). The overall DMA methodology and process are defined and conducted at Group level (OTP Bank Plc), and impacts, risks and opportunities were reassessed and updated based on methodology that is described in the Integrated report (see Ch. 1.4.1).

Within this Group level framework, OTP banka d.d. contributes through a structured **local validation process**, working with internal experts across key functions (e.g., Risk, Compliance, HR, Marketing) to identify, validate, and contextualise relevant impact topics for Slovenia. Within the Group model, **OTP banka d.d. (Slovenia)** provides local portfolio data, quantitative and qualitative inputs (client, sector, country context) to the consolidated DMA and Sustainability Statement, ensuring that **domestic impacts and stakeholder expectations** are reflected in Group priorities and disclosures.

OTP banka experts contribute to the DMA building on different assessments performed locally. **Geographic context** was considered through a Business environment scan (performed in December 2024), assessing the impact of climate related and environmental factors on OTP Group Slovenia's business environment and including a socio economic needs assessment for Slovenia. This is complemented by external tools and data sources, such as the ENCORE database, to further support the identification and assessment of relevant impact topics.

Findings from this geographic context assessment are systematically integrated into the DMA process, ensuring that the identification and prioritisation of material topics reflect not only portfolio exposure but also the most pressing environmental and social challenges in Slovenia.

The **socio-economic needs assessment** draws on the Sustainable Development Report 2024, which ranks Slovenia 11th out of 167 countries and highlights key challenges particularly related to SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action), including production-based air pollution, waste generation, and GHG emissions linked to fossil fuel use and imports. These findings directly support the prioritisation of Climate change (E1) within the DMA.

Based on these inputs, the consolidated DMA identifies and validates **priority impact areas** for the Group which are then cascaded into the local targets and action/transition plans. Within the updated Sustainability strategy, our strategic priorities have been revised to match all material topics as per OTP Group's DMA. We have identified the following material topics/priorities:

- **Climate change (E1):** climate change adaptation, mitigation and energy; our strategic priorities are **sustainable financing, portfolio resilience and own operations** for sub-topics mitigation and energy and **portfolio resilience** for adaptation.
- **Own employees (S1):** working conditions; equal treatment and opportunity for all; our strategic priorities are **corporate culture, employee well-being and diversity**.
- **Consumers and end-users (S4):** information-related impacts (data privacy/cybersecurity, financial education/marketing, adequacy of information); our strategic priority is **social responsibility**.
- **Business conduct (G1):** corporate culture and conduct (including AML/CFT and ethics); our strategic priority is **transparent and ethical operations**.

Biodiversity & ecosystems (E4) is not currently considered material for OTP banka d.d. but is kept under observation. This is due to the fact that approximately 37% of Slovenia's national territory is designated as Natura 2000 protected areas, making Slovenia the EU Member State with one of the highest shares of land covered by the Natura 2000 network; the relative small portion of agriculture financing in the portfolio; and is also supported by the bank's C&E risk materiality assessment.

Targets, Target Implementation, and Action Plans/Transition plans

Show that your bank has set and published a minimum of two SMART targets which address at least two different areas of most significant impact that your bank identified in its impact analysis. Once targets are set, explain the actions taken and progress made. Include details regarding: Alignment, Baselines, Targets, Target Implementation & Monitoring (and KPIs), Action Plans/ Transition plans and Milestones.

Banks are encouraged to disclose information regarding actions they are taking in four priorities laid out in [Leading the Way to a Sustainable Future: Priorities for a Global Responsible Banking Sector \(2024\)](#).

Links & references

- [Disclosures \(under Pillar 3\) 2025, p. 182-202](#)

Response

To support its sustainability agenda, OTP banka d.d. has an **ESG KPI dashboard** in place, covering key targets related to our strategic priorities. The KPIs are monitored according to clearly defined internal governance rules. Under the updated Sustainability strategy, targets are set for the year 2028 with interim targets for 2026. Among others, these include:

- **Green financing target** (including corporate, retail and leasing segments) set to reach €416mln by 2028.
- **GHG emission intensity targets of our financed business loan and investment portfolio** (Scope 1 and Scope 2 financed emissions), which target is defined also for longer time horizons, currently covering until 2040.

With the adoption of the prudential **transition plan**, OTP banka d.d. introduced a client **climate engagement assessment** as an additional review for economic sectors most exposed to transition risk and includes structured engagement with domestic clients to understand and, where appropriate, facilitate their transition efforts. Implementation began in **2026**, following preparation in **H2 2025**, and applies to domestic corporate and international lending portfolios.

We also have an **exclusion list** in place, providing a guardrail we don't assume new exposure to activities considered harmful on environmental or social grounds (including, among others, certain fishing activities, the mining of hard coal or lignite, and the growing/manufacturing of tobacco).

Principle 3: Clients & Customers

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

Client and Customer engagement

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities. It should include information on the client engagement strategy including but not limited to the impact areas identified/ targets set, awareness raising activities with clients and customers, relevant policies and processes, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

Links & references

- [Code of Ethics of OTP Group Slovenia and OTP banka d.d.](#)
- [Compliance Policy of OTP Group Slovenia and OTP banka d.d.](#)
- [Disclosures \(under Pillar 3\) 2025, p. 182-202](#)

Response

The Bank's approach to working with clients is included in several internal policies and processes, including **Code of Ethics**, **Compliance Policy** and a prudential **Transition plan**. Our services are developed based on an individual and professional approach and are always focused on ensuring client satisfaction.

OTP banka d.d. embeds a **Customer First** standard into everyday practice, aiming to build long-term relationships by tailoring services to individual needs and continuously streamlining processes to improve satisfaction. Client excellence is a strategic priority: teams seek the most appropriate solutions, communicate clearly, and work collaboratively to deliver distinctive user experience. As a responsible provider, the bank gives special attention to **consumer protection**, ensuring that staff who interact with customers receive appropriate training and apply consumer-protection rules with due care and diligence. The bank helps customers make informed decisions through **transparent information, financial education**, and targeted measures for **vulnerable groups**. Compliance is monitored from product design through marketing and relationship management; commercial communications follow principles of **good faith and fair dealing** and avoid unfair practices. Customer feedback and complaints are handled promptly and effectively in full cooperation with customers and in line with legal requirements.

OTP banka d.d. is committed to enforcing consumers' interests by applying consistent consumer-protection principles that reflect evolving customer habits and needs. The bank designs and, where necessary, redesigns products to meet internal policies, legal and supervisory requirements, and continuously monitor changes in national/EU laws and supervisory expectations to remain compliant. It engages customers from the product-development stage onward, using ongoing dialogue to improve existing offerings and create new, customer-friendly solutions. Consumer-protection considerations are embedded throughout product design, and all commercial communications comply with consumer-protection and competition law under the bank's **Consumer Protection Compliance Programme**, for which an information note is published on the website. This end-to-end approach operationalizes and aligns customer engagement, product governance, and transparent communication with robust, forward-looking compliance.

In the second half of 2025, in line with the EBA Guidelines on the management of ESG risks (EBA/GL/2025/01) (and CRD6) the Bank prepared its prudential transition plan, intended to ensure resilience of OTP banka d.d. to the risks arising from the transition to a low-carbon economy. For the domestic corporate and international lending portfolios, the plan introduces **client climate engagement assessment** as an additional review of clients in economic sectors identified as most relevant from a transition risk perspective. It includes engagement with domestic clients with the aim to better understand and, where appropriate, facilitate their transition efforts. The process being implemented started in 2026.

Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how your bank has developed these in the reporting period. Provide information on sustainability-related products and services and frameworks in place that support the transition needs of clients, size of the sustainable finance portfolio in USD or local currency and/or as a % of your bank's portfolio,* and which SDGs or impact areas you bank is striving to make a positive impact on (e.g. green mortgages–climate, social, sustainability bonds–financial inclusion, etc.).

* Provide information on the sustainable finance frameworks/standards/taxonomies used to label sustainable finance volumes

Links & references

- [Disclosures \(under Pillar 3\) 2025, p. 182-202](#)
- [Sustainable loans | OTP banka](#)
- [OTP Group - Green transition and sustainable finance](#)
- [Sustainable Finance Framework](#)

Response

We recognize that as one of the largest banking institutions in Slovenia, OTP banka d.d. plays a key role in financing the sustainable growth of the Slovenian economy, and we aim to support the transition to a low-carbon economy. Through sustainable financing and other solutions, we aim to help Slovenian companies and individuals in their **transition to more environmentally friendly, sustainable operations**. To this end, the Bank offers a wide range of sustainable products to its clients.

For households, the Bank offers sustainable loans, providing financing for green mobility (bicycles, e-bikes and electric cars) and energy efficiency (energy-efficient appliances and renewable energy usage). The Bank also offers housing loans with preferential rates for the purchase of energy-efficient real estate. Retail green loans are aligned with Technical Screen Criteria of the EU Taxonomy for substantial contribution (the bank currently only considers mortgage loans). Transition-enabling loans are purposed loans, either with transition commitments by the clients (reductions in emissions, energy usage, water usage, etc.); or real estate projects with EPC A class but are not meeting all the technical screening criteria of green loans. In the retail segment, they are defined based on clear product criteria (sustainable housing loan with insurance and cash loans offered by the bank).

For corporate clients, we offer financing solutions focusing on energy efficient buildings, renewable energy solutions and energy efficiency in general, as well as clean transportation. The Bank is thus providing green financing to its customers in line with the frameworks of OTP Group: the Sustainable Finance Framework and the Green Capital Relief Program of the Central Bank of Hungary (Magyar Nemzeti Bank).

Green financing

At the end of 2025, OTP banka d.d.'s financing provided to green and transition-enabling investments reached €308 million, exceeding the target defined in our ESG strategy. Our portfolio is mostly comprised of financing energy efficient buildings, sustainable transportation, and the energy sector. Out of this, €224 million is considered to be green investment (in line with the definitions applied across OTP Group).

Sustainable investments

The Bank has set a goal to keep its share of investment in green bonds at over 5%, a level which has been exceeded in 2025 and stood at 8%. The Bank in line with its Investment Strategy intends to keep this ratio for 2026 as well, and seeks investments, if possible, in corporate green bonds to support the transition of the real economy.

Principle 4: Stakeholders

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

Stakeholder identification and consultation

Describe which stakeholders (or groups/types of stakeholders) your bank has identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of the bank's engagement strategy following criteria for effective engagement and advocacy, how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Links & references

- [OTP bank Plc. Integrated Annual Report 2025, p. 86 - 35](#)

Response

OTP banka d.d. is part of the OTP Group perimeter covered by the consolidated CSRD/ESRS reporting; our local stakeholder inputs feed into **Group-level DMA processes** and governance, ensuring that domestic expectations and regulatory specifics are reflected in Group priorities and reporting. Consistent with the DMA, the Group engages a broad set of stakeholders: **customers and communities, employees and trade unions, investors and analysts, regulators and supervisors, suppliers and business partners, NGOs and civil-society bodies, and academia/media**. Local stakeholder inputs from subsidiaries, including OTP banka d.d. (Slovenia), are consolidated at Group level to ensure domestic priorities are reflected in Group material topics and actions. Engagement is **structured, recurring, and evidence-based** (surveys, interviews, roundtables, regulatory consultations, employee channels, whistleblowing mechanisms, supplier due-diligence).

Principle 5: Governance & Culture

We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

Governance Structure for Implementation of the Principles

Describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts (including accountability at the executive leadership level, clearly defined roles and responsibilities for sustainability matters in internal processes, etc.) and support the effective implementation of the Principles.

Links & references

- [Disclosures \(under Pillar 3\) 2025, p. 182-202](#)

Response

OTP banka d.d. currently has a two-level committee structure on ESG matters. The highest-level dedicated committee is the **Client Excellence (CX) & ESG Committee**, that comprises all members of the Management Board. Its mission is to ensure comprehensive implementation of the Sustainability strategy across the entire organization and to make the most of the potential brought by business opportunities arising from the ESG transformation, including identifying and managing climate-related risks and opportunities.

Besides the CX&ESG Committee, the **Climate Change and Sustainability (CC&S) Committee** acts as an expert committee, responsible for the operative implementation of the Sustainability strategy and related tasks, amongst others monitoring the performance of set goals and targets, discussing ESG relevant regulatory and supervisory expectations, guiding relevant ESG policies and overwatching their implementation, as well as overseeing implementation of the PRB. On important issues it is reporting to the Customer Excellence & ESG (CX&ESG) Committee. Members of CC&S Committee are relevant Directors (employees) of the bank and SKB Leasing.

The **Corporate Strategy and Transformation Sector** is responsible for coordinating all ESG activities based on the Sustainability strategy, the adopted action plan and other regulatory requirements and expectations. It is a main point of contact for all ESG-related matters.

Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, learning & development, sustainability training for relevant teams, inclusion in remuneration structures and performance management and leadership communication, amongst others).

Links & references

- [Disclosures \(under Pillar 3\) 2025, p. 182-202](#)
- [Code of Ethics of OTP Group Slovenia and OTP banka d.d.](#)

Response

At OTP banka d.d., we promote a responsible-banking culture anchored in our **Code of Ethics**. In 2025 we refreshed and communicated our organizational vision, values and target behaviors. In 2026 we are strengthening a **unified, future-ready culture** by clearly articulating behavioral expectations and embedding them across the employee experience to drive higher engagement, cohesion and performance.

We are embedding **cultural principles** across all employees-lifecycle touchpoints, including hiring, onboarding, performance management and recognition. Furthermore, we focus on defining **leadership standards** and applying our **DEIB policy** consistently in hiring, development, rewards and day-to-day interactions. We also increasingly seek **young talents** to build new capabilities essential for future competitiveness. Our focus is on establishing a strong and sustainable early-career talent pipeline that brings fresh perspectives, digital skills, and long-term growth potential.

OTP banka d.d. is continuously developing its capacities to ensure appropriate **knowledge, skills, and expertise** for the effective implementation of its Sustainability Strategy and the transition plan. ESG focused training courses are annually provided to Supervisory Board and Management Board members to ensure appropriate oversight of the topic. The bank has a dedicated sustainability team (within the Corporate Strategy and Transformation Sector) that is responsible for preparing and revising ESG-related training plans on an annual basis. In addition to the training for Board members, internal basic and dedicated trainings are conducted, ensuring all employees receive the capabilities, tools, and role-specific guidance to apply in day-to-day decisions, manage ESG risks responsibly, uphold consumer-protection standards, and escalate concerns through defined channels.

Our remuneration policy is aligned with Group business and risk strategy, including ESG risk, corporate culture and values, long term interests, and conflict of interest safeguards. Variable pay is determined annually against performance criteria derived from Group strategic objectives that incorporate the sustainability strategy. Accordingly, **ESG targets are embedded in scorecards for all employees, including Management Board members**, and achievement against these targets **directly influences variable remuneration**.

Our strategic priority of **Social Responsibility** is further operationalised through corporate social responsibility (CSR) activities, including financial literacy programmes for different age groups, anti-fraud lectures for SME, micro and corporate clients, employee volunteering initiatives, and community and national partnerships through sponsorships and donations. These initiatives complement our core banking activities and support positive societal outcomes, particularly in financial inclusion, education and community resilience.

We also support biodiversity through two **urban beehives** installed on the rooftops of our business buildings in Slovenia's two largest cities, hosting several bee colonies with more than 500,000 bees. The initiative contributes to biodiversity preservation and is complemented by planting melliferous plants, cooperation with beekeepers, and environmental awareness activities. Honey produced by the colonies is used by the bank as a symbolic expression of its sustainability commitment.

Employee participation in CSR activities, particularly through structured volunteering programmes, reinforces our responsible-banking culture by strengthening employees' connection with local communities and supporting the development of values-based behaviours in practice.

Risk and due diligence processes and policies

Describe what processes your bank has installed to identify and manage environmental and social risks associated with your bank's portfolio. This can include aspects such as identification of significant/salient risks, due diligence processes, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures your bank has in place to oversee these risks.

Links & references

- [Disclosures \(under Pillar 3\) 2025, p. 182-202](#)

Response

The bank identifies ESG (including climate and environmental) risks by integrating them into existing risk types and embedding them into its risk management framework, including internal capital and liquidity adequacy processes.

Risk identification is supported by a dedicated **climate and environmental risk methodology** that defines relevant time horizons, maintains a register of physical and transition risk drivers, maps these drivers to risk types, and performs periodic materiality assessments using probability, severity and impact to arrive at a standardised materiality rating.

ESG due diligence is integrated into the credit risk and loan approval process through defined procedures for collecting, validating and monitoring ESG information from publicly available sources, external data providers and direct client input (including questionnaires). The framework applies to both an individual and portfolio-based ESG risk assessment, including customer scoring across environmental, social and governance factors, decision-making authorities linked to the assessed ESG risk level, and the use of exclusion lists.

In parallel, the bank's **prudential transition plan** sets portfolio-specific approaches and targets to strengthen resilience to transition-related risks and to steer portfolio alignment over time. For higher-exposure clients in transition-relevant sectors, the bank **introduces structured client engagement** to assess transition readiness and to support clients' transition efforts where appropriate. Where engagement outcomes indicate heightened risk or insufficient progress, the client's ESG risk classification may be escalated, triggering enhanced governance and escalation to the relevant credit decision-making committee level.

Principle 6: Transparency & Accountability

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

The information provided in the Responsible Banking Progress Statement is sufficient. If third-party assurance has been undertaken, provide details on the scope of assurance and the reference/link to the Independent (Limited) Assurance Report