



UPDATED 2025 REMUNERATION DISCLOSURES OF OTP GROUP LUXEMBOURG 2025 (Article 450 CRR)



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1 REMUNERATION POLICY

This document presents the updated remuneration disclosures prepared in accordance with Article 450 of Regulation (EU) No 575/2013 (CRR) and the related Implementing Technical Standards. The initial version of the disclosures was published on 26 May 2026. As the final data on annual variable remuneration for 2025 had not yet been approved at the time of the initial publication, the disclosures in this section were based on estimated amounts. Following the approval of the final variable remuneration data by the competent governance bodies, including the Supervisory Board of the Bank, the disclosures have been updated accordingly and are republished in this version.

The remuneration disclosures are prepared in line with the Bank's internal remuneration policies, which have been adopted and approved within the applicable governance framework, and provide an overview of the remuneration system at the level of the OTP Group Slovenia, including information on the criteria used for performance measurement and risk adjustment.

The remuneration policy, including its amendments and supplements, was reviewed by the Bank's Management Board and the Remuneration Committee and approved by the Supervisory Board of the Bank, which together with other competent bodies ensures its adequate oversight and implementation within the corporate governance framework.

1.1 **INFORMATION CONCERNING THE DECISION-MAKING PROCESS USED FOR DETERMINING THE REMUNERATION POLICY, AS WELL AS THE NUMBER OF MEETINGS HELD BY THE MAIN BODY OVERSEEING REMUNERATION DURING THE FINANCIAL YEAR, INCLUDING, IF APPLICABLE, INFORMATION ABOUT THE COMPOSITION AND THE MANDATES OF THE REMUNERATION COMMITTEE, THE EXTERNAL CONSULTANT WHOSE SERVICES HAVE BEEN USED FOR THE DETERMINATION OF THE REMUNERATION POLICY AND THE ROLE OF THE RELEVANT STAKEHOLDERS**

(Article 450 (1a) of the CRR)

The Bank has had a Remuneration Policy in place since 2012 for the purpose of implementing remuneration practices. The Remuneration Policy applies to all employees, is gender-neutral and takes into account the principle of equal pay for equal work, or work of equal value, regardless of gender. The Bank mainly defines groups of employees with respect to the materiality of their impact on the Bank's risk profile in accordance with the criteria set out by EU regulations or in accordance with the Bank's own criteria.

The Bank's Remuneration Policy defines all forms of remuneration to which employees are entitled, general and specific principles for adjusting remuneration to risks, those responsible for establishing, amending and supervising the implementation of the Remuneration Policy, and reporting. The Remuneration Policy is based on the link between remuneration and the prudent take-up of risks, and is designed so as not to encourage the increased willingness to take-up risks or to act in contravention of the Bank's interests. This is ensured by defining appropriate ratios between the fixed and variable components of remuneration of employees whose activities have a material impact on the Bank's risk profile, taking into account the fact that the total remuneration of those employees may not be highly dependent on the variable component of remuneration.

The Remuneration Policy sets the variable component of the remuneration of staff whose activities have a material impact on the risk profile by ensuring and promoting the effective management of all material risks that are taken up by the aforementioned staff in the performance of their work and the exercise of their powers. The remuneration of the identified staff is determined on the basis of an annual assessment of each employee's performance, comprising the employee's institutional and individual targets. Qualitative objectives (competences) are also taken into account in the setting of remuneration. The objectives derive from the Bank's business strategy and long-term interests. The setting of the remuneration of identified staff is discussed and confirmed by the Bank's Management Board, Remuneration Committee and Supervisory Board.



The payment of variable remuneration to employees who are not deemed identified staff under the Remuneration Policy is carried out in accordance with valid regulations and the bylaws of the Bank.



Responsibility for the creation, approval and supervision of the Remuneration Policy

The Bank's Management Board, Remuneration Committee, Risk Committee and Supervisory Board work closely in the implementation of remuneration policies and practices, and ensure the necessary harmonisation with the general corporate governance framework of the Bank, its corporate culture, risk appetite and associated management processes.

In the scope of their competences, the Remuneration Committee and the Bank's Supervisory Board regularly verify the appropriateness of adopted remuneration policies and practices, and control the implementation thereof. They also approve material exceptions for individual employees and changes to the Remuneration Policy, and carefully study and monitor their effects.

Role of independent control functions

In accordance with their competences, the Bank's individual expert departments are involved in the creation, supervision and review of the appropriateness of the Remuneration Policy.

The Strategic Risk Management Department participates in and reports on the definition of performance criteria that take into account taken-up risks (including subsequent adjustments), and assesses how the structure of the variable components of remuneration affect the Bank's risk profile and the risk take-up culture. The Strategic Risk Management Department confirms and assesses information regarding adjustments due to risks and cooperates regularly with the Remuneration Committee in this area.

The Compliance Office analyses how the Remuneration Policy affects the Bank's compliance with laws, regulations, internal policies and the risk take-up culture, and reports all identified compliance risks and issues of non-compliance to the Management Board and Supervisory Board. The findings of the Compliance Office are considered by the Supervisory Board in the approval, review and supervision of the Remuneration Policy.

At least once a year, the Internal Audit Department carries out an independent review of the bases, implementation and effects of the Bank's Remuneration Policy on its risk profile and the treatment of those effects.

Remuneration Committee

Composition of the Remuneration Committee in 2025:

Draga Cukjati, Chair
Tamás Bernáth, Deputy Chair
Sándor István Pataki, Member
Anna Mitkova Florova, Member

All members of the Remuneration Committee are also members of the Supervisory Board. The Remuneration Committee did not use the services of external advisors in 2025.

In accordance with the Banking Act (ZBan-3), the Remuneration Committee is an advisory body of the OTP banka Supervisory Board and has the following competencies in that regard:

- responsibility for drafting remuneration-related decisions that are adopted by the Supervisory Board, in particular with regard to the remuneration of Management Board members and other employees whose professional activities have a material impact on the Bank's risk profile;
- the provision of support and advice to the Supervisory Board in connection with the formulation of a gender-neutral Remuneration Policy;
- the provision of support to the Supervisory Board with regard to control over the remuneration-related policy, practices and processes, with regard to compliance with the Remuneration Policy, and implementation of and compliance with a gender-neutral policy;
- verification of whether the existing Remuneration Policy is still appropriate, and proposal of amendments as required;
- assessment of the appointment of external advisors that the Supervisory Board might hire for advisory services or support with regard to remuneration;



- assurance of the relevance of information provided to shareholders regarding the Remuneration Policy and practices, in particular regarding the proposed raising of the maximum ratio between the fixed and variable components of remuneration;
- an assessment of the mechanisms and systems in place to ensure that the remuneration system takes appropriate account of all types of risks, and the level of liquidity and capital, and that the overall Remuneration Policy is in line with and promotes prudent and effective risk management, and is in line with the business strategy, objectives, corporate culture and values, risk culture and long-term interests of the Bank;
- an assessment of the achievement of performance objectives and the need for subsequent adjustments to risks, including through malus or clawback arrangements;
- a review of different potential scenarios to verify how remuneration policies and practices respond to external and internal events, and the back-testing of criteria used to define the apportionment and preliminary adjustment of variable remuneration to risks based on the results of realised risks;
- direct control over the remuneration of identified staff in independent control functions, including the member of the Management Board and Chief Risk Officer, Internal Audit Department and Compliance Department, and the drafting of recommendations for the Supervisory Board concerning the formulation of a remuneration package and remuneration amounts paid to senior employees in control functions;
- steps to ensure the appropriate involvement of the HR Management and Organisation Department, the Strategic Risk Management Department and the department responsible for accounting and controlling in the relevant professional areas, and the search for external advisors as required.

Within the scope of its competences, the Remuneration Committee ensures that a centralised and independent review of the Remuneration Policy and practices is carried out at least once a year, in accordance with regulations, policies, procedures and internal rules, by the Internal Audit Department in cooperation with the Bank's expert departments, taking the latter's competences into account. The Supervisory Board is responsible for reviewing the Remuneration Policy.

The Remuneration Committee met at four regular and three correspondence sessions in 2025, and reported on the content it discussed at sessions of the Supervisory Board.

Amendments to the Remuneration Policy were discussed by the Management Board and Remuneration Committee in 2025, and then confirmed by the Supervisory Board at an ordinary session held on 18 September 2025. The most recent change, which took effect on 1 October 2025, was the alignment of the Remuneration Policy with the OTP Bank Nyrt. Remuneration Policy.

Definition of employees whose professional activities have a significant impact on the Bank's risk profile

In accordance with the law, the Bank performs, at a minimum, an annual self-assessment of the appropriateness of the identification of staff whose professional activities have a material impact on the Bank's risk profile based on the qualitative and quantitative criteria set out in Commission Delegated Regulation (EU) 2021/923 and the Bank's additional internal criteria. An assessment of the list of employees whose professional activities have a material impact on the Bank's risk profile is also carried out in the event of major changes to the Bank's organisational structure and legislative changes.

Also taken into account in the identification of employees whose professional activities have a material impact on the Bank's risk profile is the additional condition that those employees be treated as such for at least three months during the financial year.

Identified staff fall within the personal scope of application of the Remuneration Policy, which is set at three levels for the OTP Group:

- the consolidated level (OTP Group level) of personal application of the policy includes those employees (employees defined at the consolidated level) whose professional activities have a significant impact on the risk profile of the entire OTP Group;
- the sub-consolidated level of personal application of the policy includes those employees (employees defined at the sub-consolidated and local levels) whose business activities have a significant impact on the risk profile of the Group, made up of an institution under the direct ownership of OTP Bank Nyrt. (credit institution or investment company) and its subsidiaries;
- the local level of personal application of the policy includes those employees whose business activities have a significant impact on the risk profile of a specific institution.



In accordance with their responsibilities, the Remuneration Committee and Risk Committee are actively involved in the process of defining the aforementioned staff, in cooperation with the Bank's expert departments (Strategic Risk Management Department, Compliance Office and HR Management and Organisation Department), in accordance with their tasks.

The managing directors of subsidiaries or certain other employees whose professional activities have a significant impact on a company's risk profile are placed within the category of employees whose professional activities have a significant impact on the risk profile of subsidiaries. The Bank ensures that the Remuneration Policy is implemented and taken into account by the entire Group on a consolidated and sub-consolidated basis.

1.2 INFORMATION ON LINK BETWEEN PAY AND PERFORMANCE

(Article 450 (1b) of the CRR)

In accordance with the Banking Act (ZBan-3), the Regulation on internal governance arrangements, the management body and the internal capital adequacy assessment process for banks and savings banks, the Regulation on the application of the Guidelines on sound remuneration policies under Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013, and the EBA guidelines of 2 July 2021 (EBA/GL/2021/04), the Bank is obliged to establish and implement a Remuneration Policy at the Group level for categories of identified staff that promotes sound and effective risk management.

The Remuneration Policy relates to all forms of remuneration (fixed and variable) of employees whose professional activities have a material impact on the Bank's risk profile. Bylaws governing performance-related pay for Bank employees who are not identified staff are also an integral part of the Remuneration Policy. Special rules apply to sales staff in the business network, corporate banking staff, contact centre staff, private banking and financial markets staff and other staff, including non-cash benefits.

The Remuneration Policy is in line with institutional and individual targets, the Bank's business and risk management strategies, including environmental, social and governance risks and targets in connection with those risks, the corporate culture and values, the Bank's long-term interests, and measures to prevent conflicts of interest. To that end, the objective is to ensure at the Bank a structure and payment of remuneration that provides for the appropriate motivation of employees, while not encouraging employees to irresponsibly take disproportionately large risks in the course of their work, or risks that exceed the Bank's risk absorption capacity.

Variable remuneration is based on the performance of the Bank or on institutional and individual targets, and takes into account the risks taken up. The Remuneration Policy in connection with variable remuneration and the appraisal of performance clearly distinguishes between the effects of the work of business units and the corporate and control functions. The Remuneration Policy helps the Bank achieve and maintain the target level of own funds and liquidity.

The principles set out in the Remuneration Policy are also applied to subsidiaries.

The Bank includes the effect of variable remuneration (immediate and deferred amounts) in the planning of own funds and liquidity, and in its internal capital adequacy assessment process. The total variable remuneration apportioned by the Bank may not limit its ability to maintain or re-establish the target level of own funds and liquidity in accordance with the Group's Risk Appetite Strategy, and must take into account the interests of shareholders, owners, depositors, investors and other stakeholders. Variable remuneration may not be apportioned or paid if this would cause a drop in the target level of own funds below the minimum capital requirement set out in the relevant SREP decision, or a drop in key liquidity ratios, defined in accordance with the risk appetite statement, below the acceptable thresholds set out in the same document. If the Bank does not have a sound capital and liquidity base or that soundness is at risk, it must adapt and implement the appropriate measures in connection with variable remuneration in accordance with the Remuneration Policy.



1.3 MOST IMPORTANT DESIGN CHARACTERISTICS OF THE REMUNERATION SYSTEM, INCLUDING INFORMATION ON THE CRITERIA USED FOR PERFORMANCE MEASUREMENT AND RISK ADJUSTMENT, DEFERRAL POLICY AND VESTING CRITERIA

(Article 450 (1c) of the CRR)

Since 2017 the Bank has deployed a performance management system. In 2025, this system set out the institutional targets and the individual's personal (individual) targets for the year; these also include environmental aspects with the aim of enhancing corporate sustainability (ESG¹ strategy). Targets are set and assessed annually for employees whose professional activities have a significant impact on the Bank's risk profile. Other employees are given personal individual targets on an annual, quarterly or monthly basis in line with their area of work. Assessments of competencies are also part of an employee's annual performance review.

The variable remuneration amount is adjusted accordingly to changes in the achievement of individual and institutional targets. The Bank complies with the provisions of the ZBan-3, which states that, if the proportionality threshold is exceeded, 50% of variable remuneration shall comprise ordinary and preference shares in OTP Bank Nyrt., or share-linked instruments or equivalent non-cash instruments, where the acquirer may only transfer such shares or instruments with the Bank's permission, which may not be granted for at least two years following acquisition.

Criteria used for performance assessment for the payment of variable remuneration, and ratio between the fixed and variable remuneration of employees whose professional activities have a significant impact on the Bank's risk profile

The apportionment of variable remuneration for identified staff is the responsibility of the Remuneration Committee and the Supervisory Board, and is based on a performance assessment that takes into account the risk management strategy and is in line with the Bank's business strategy. When apportioning the variable element of remuneration to identified staff, the Bank takes appropriate account of the need to maintain or re-establish the target level of own funds and liquidity, the potential influences of external and internal stakeholders, and the regulatory body's recommendations and guidelines.

The members of the Supervisory Board only receive fixed remuneration.

The basic principle of the system for measuring and evaluating performance is that the amount of remuneration based on performance, together with an ex-ante and ex-post risk assessment, is linked to:

- achievement of the institutional objectives at Group/Bank/subsidiary level, and
- the achievement of individual objectives and targets (numerical indicators, individual objectives and skills).

Success in meeting the targets, which serves as the criterion for receiving performance-based remuneration, is determined as the weighted arithmetical average of the institutional and individual targets with a weighting of indicators at institutional level, where the weighting of those indicators decreases in line with the decreasing management level. For internal control functions (internal controls, compliance, risk management), the principle is that indicators at institutional level are given less weight – one level lower than the organisational level in question. Individual performance cannot be "increased" with the performance of the Group as a whole. If the Group's performance is higher than the appraisal score given to an individual, the individual appraisal score takes precedence.

The OTP Bank Nyrt. Supervisory Board sets two thresholds (performance threshold, tolerance threshold) for the financial indicators used for performance assessment. The achievement of a target below the performance threshold means 0% achievement and, in such a case, the employee is not entitled to performance-based remuneration. Performance that is between the performance and tolerance thresholds is the actual score attributed to the indicator. In that case, the employee is entitled to receive performance-based remuneration.

The ratio between performance-based remuneration available as part of the general variable remuneration budget and total remuneration depends on the organisational level and the function (business, support, control) that the employee performs, and may be up to 40% of their total annual remuneration. Where an exceptional variable remuneration budget is established, the performance-related remuneration payable to the beneficiary may not, as a rule, exceed 50% of the performance-related

¹ ESG is an acronym that describes the way a company operates and manages its impacts in three areas: environmental, social and governance.



remuneration provided for in the general variable remuneration budget. The ratio between performance-related remuneration and basic remuneration may not exceed 100% even if general and exceptional variable remuneration budgets have been created.

Level of variable remuneration according to level and type of function/position

		Levels							
		Level 1		Level 2		Level 3		Level 4	
		min.	max.	min.	max.	min.	max.	min.	max.
Type of position	Business	30%	40%	20%	40%	11%	40%	0%	25%
	Support	-	-	20%	40%	0%	34%	0%	25%
	Control	-	-	20%	34%	0%	34%	0%	25%



Deferral of payment and payment in the form of ordinary or preference shares of the Bank or in the form of share-linked instruments or equivalent non-cash instruments – deferral scheme

The Remuneration Policy includes provisions regarding the required deferral of payment, and required payment in the form of financial or non-cash instruments as variable remuneration for identified staff. In the event of the apportionment of variable remuneration in excess of the gross amount of €50,000.00 or remuneration in excess of one-third of an employee's total annual remuneration, the Bank uses a deferral scheme created as follows (principle of proportionality):

- 60% of the amount of remuneration is paid immediately (advance payment);
- 40% of the amount of remuneration is deferred and paid in a proportionate amount (on a "pro rata" basis) over a period of four to five years;
- a two-year deferral period applies for shares and instruments, where that deferral period begins following the maturity of instruments that were apportioned as variable remuneration. During that period, those instruments may not be sold or accessed (applying the formula $n+x+2$, where "n" represents the moment when the up-front part of apportioned variable remuneration is paid and "x" represents the year of each year of deferral).

The Remuneration Policy also sets out cases where a higher proportion of the remuneration is deferred than is set out above (e.g. a high amount, identification at the consolidated level).

Performance must be reassessed prior to payment of the deferred portion of cash or the maturity of deferred instruments for payment, and a preliminary risk adjustment made to variable remuneration, as required, to ensure that variable remuneration is in line with newly identified risks or risks that were realised following apportionment.

The process of adjusting variable remuneration to risks includes the process of measuring performance and risks, the process of apportionment and the process of payment. In all phases of risk adjustment, variable remuneration is adjusted for all current risks (ICAAP) and risks taken-up in the future (stress tests). An appropriate combination of quantitative and qualitative criteria, in the form of absolute and relative criteria, is applied in the process of adjusting variable remuneration to risks in order to ensure that all risks, performance and the necessary risk adjustments are taken into account.

The Bank sets the planned amount of variable remuneration and variable remuneration that will be apportioned on the basis of an assessment of performance and taken-up risks. The adjustment of variable remuneration to risks prior to apportionment ("ex-ante risk adjustment") is based on risk indicators, and ensures that apportioned variable remuneration takes full account of risks assumed. Preliminary adjustments in the calculation of risk-adjusted variable remuneration are made at the level of the Bank and at the level of organisational unit where possible.

The highest amount that can be apportioned to employees as severance pay is 12 salaries, unless otherwise stated by the law, sectoral collective agreement or company-level collective agreement.

Severance pay may not represent a disproportionate benefit, but rather appropriate compensation for employees in the event of contract termination. It must reflect performance achieved in a given period, and may not reward an employee for non-performance or breaches. Severance pay may not be apportioned when employees terminate their employment voluntarily (ordinary termination of an employment contract by an employee) because they have accepted a job at a different legal entity.

The Bank did not provide discretionary pension benefits in 2025.

Malus and clawback

The Remuneration Policy defines cases when the cash element of the deferred portion of variable remuneration or the number or value of instruments comprising the deferred portion of variable remuneration is reduced (including to zero) by the Bank's Supervisory Board for a member of the Management Board or by the Management Board for other identified staff on account of a subsequent risk adjustment prior to maturity for payment. The circumstances that affect decision-making on changes to, reductions in and the non-payment of an individual's variable remuneration relate mainly to their participation in or responsibility for conduct that has led to major losses for the Bank or compliance with fitness and propriety standards. Moreover, the Bank's Management Board, Remuneration Committee and Supervisory Board may take into account other potential variables when making decisions regarding variable remuneration, decisions regarding final changes to variable remuneration (either current or deferred) and decisions regarding the use of clawback.



1.4 RATIOS BETWEEN FIXED AND VARIABLE REMUNERATION SET IN ACCORDANCE WITH ARTICLE 94(1)(G) OF DIRECTIVE 2013/36/EU

(Article 450 (1d) of the CRR)

The Bank classifies remuneration to fixed or variable.

The criteria for classification to fixed remuneration are as follows:

- the level of professional experience and years of service are taken into account in a uniform manner;
- remuneration is transparent with regard to the individual amount apportioned to a specific employee;
- remuneration is constant, i.e. it is maintained for a period linked to a specific role and organisational responsibilities;
- remuneration is irrevocable; a constant amount is only changed based on collective negotiations;
- the Bank may not reduce, terminate or recall remuneration;
- remuneration does not encourage the take-up of risks;
- remuneration is not dependent on the performance of the Bank, organisational unit and employees;
- remuneration is apportioned in a form that cannot be deferred;
- remuneration is part of a typical employment package;
- remuneration is linked to a role or organisational responsibility, and is apportioned until there is no material change in connection with the responsibilities and competences of that role and such a change could lead to an employee's entirely different role or organisational responsibility;
- the amount is not dependent on other factors, but solely on the performance of a specific role or organisational responsibility and
- all other employees who perform the same role or have the same organisational responsibility and hold a comparable position would be entitled to comparable compensation.

Remuneration that the Bank is unable to define as fixed remuneration in accordance with the criteria set out in the previous paragraphs is defined as variable remuneration.

The Bank follows the principle of proportionality when formulating and implementing the Remuneration Policy. This means that the Remuneration Policy and the implementation thereof are in line with the Bank's risk profile, risk appetite and strategy. When assessing proportionality, the Bank takes into account criteria in connection with the specific circumstances of the Bank's operations, such as size and internal organisational structure, and the nature, scope and complexity of the Bank's activities, including risk factors that derive from the amount of variable remuneration of specific identified staff.

The Remuneration Policy is a reflection of the close link between remuneration and the prudent take-up of risks, and is not designed to encourage the increased willingness to take-up risks or to act in contravention of interests. This is ensured by defining appropriate ratios between the fixed and variable components of employee remuneration, taking into account the fact that variable component of remuneration is not directly linked to the scope or value of executed transactions or with the associated risk exposure.

The fixed component of remuneration represents the contractually defined base wage, which is based on the complexity and scope of work, and correlates with assumed responsibilities, set objectives and risks.

The Bank sets the entire variable portion of remuneration on the basis of a combination of assessments of the employee's institutional and individual targets and their competencies.

The total variable remuneration apportioned by the Bank may not limit its ability to maintain or re-establish a sound level of own funds and liquidity, and must take into account the interests of shareholders, owners, depositors, investors and other stakeholders. Variable remuneration may not be apportioned or paid if this would threaten the Bank's sound level of the own funds and liquidity.



In the scope of its Remuneration Policy, the Bank defined the maximum ratio between the variable and fixed elements of total remuneration for identified staff. That ratio is 1:1. The actual amount of apportioned variable remuneration is confirmed by the responsible decision-making body.

Employees whose professional activities have a material impact on the Bank's risk profile must strive to avoid the use of personal insurance to hedge against risks, or remuneration- and liability-related insurance to undermine the risk alignment effects embedded in their variable remuneration.

1.5 INFORMATION ON THE PERFORMANCE CRITERIA ON WHICH THE ENTITLEMENT TO SHARES, OPTIONS OR VARIABLE COMPONENTS OF REMUNERATION IS BASED

(Article 450 (1e) of the CRR)

For determining variable remuneration for the purposes set out in points 3 and 4 of the second paragraph of Article 190 of the ZBan-3, the Bank set the lower threshold for the definition of variable remuneration, such that the total variable remuneration of identified staff that does not exceed €50,000 gross in a given year and that does not exceed one third of their total annual remuneration does not constitute variable remuneration for the purposes of the aforementioned provision. The limits defined by the fundamental principles of points 3 and 4 of the second paragraph of Article 190 of the ZBan-3 (the apportionment of the variable element in shares or relevant instruments, and the deferral of payment of a portion of variable remuneration) therefore do not apply to variable remuneration under the lower threshold. This rule is not applied to employees defined at the consolidated level.

In accordance with the guidance referred to in the previous point, the amount of variable remuneration does not represent a material risk factor at the level of identified staff or such variable remuneration is negligible with respect to the risk posed to the Bank.



1.6 MAIN PARAMETERS AND RATIONALE FOR ANY VARIABLE COMPONENT SCHEME AND ANY OTHER NON-CASH BENEFITS

(Article 450 (1f) of the CRR)

The main parameters and rationale for the variable component scheme are disclosed in point 17.3. Other non-cash benefits are defined in individual employment contracts, which are approved by the Supervisory Board for members of the Management Board, and by the Management Board for employees whose professional activities have a material impact on the Bank's risk profile and for others on individual employment contracts. A range of non-cash benefits is part of a typical employment package, and depends on the standard package for a specific management level, with respect to the scope of employee's responsibilities. They relate to:

- a company car (for business/private use),
- the payment of rent for living quarters,
- an OTP banka d.d. company credit card,
- accident, life and health insurance,
- supplementary pension insurance,
- managerial medical examinations,
- education and training,
- the payment of education costs for minor children,
- liability insurance,
- representation costs,
- parking space, and
- other reasonable work-related costs.

1.7 AGGREGATED QUANTITATIVE INFORMATION ON REMUNERATION OF STAFF WHOSE PROFESSIONAL ACTIVITIES HAVE A MATERIAL IMPACT ON THE BANK'S RISK PROFILE

The templates disclosed in this section do not include rows that are not relevant for the Group. The data are presented in euros.



Template 1 : EU REM1 – Remuneration awarded for the 2025 financial year
(Article 450 (1)(h)(i) and (ii) of the CRR)

	a. MB Supervisory function	b. MB Management function	c. Other senior management	d. Other identified staff
Fixed remuneration				
1. Number of identified staff	8	6	22	20
2. Total fixed remuneration	320,583.10	3,421,994.51	3,121,537.74	2,110,669.40
3. Of which: cash-based	320,583.10	3,234,875.59	3,013,439.78	2,028,143.62
EU-4a. Of which: shares or equivalent ownership interests				
5. Of which: share-linked instruments or equivalent non-cash instruments				
EU-5x. Of which: other instruments				
7. Of which: other forms		187,118.92	108,097.96	82,525.78
Variable remuneration				
9. Number of identified staff		6	21	19
10. Total variable remuneration		2,623,648.65	1,208,342.00	684,400.64
11. Of which: cash-based		1,503,738.65	772,476.00	550,300.60
12. Of which: deferred		671,946.00	174,346.40	46,278.77
EU-13a. Of which: shares or equivalent ownership interests				
EU-14a. Of which: deferred				
EU-13b. Of which: share-linked instruments or equivalent non-cash instruments		1,119,910.00	435,866.00	134,100.05
EU-14b. Of which: deferred		671,946.00	174,346.40	53,640.02
EU-14x. Of which: other instruments				
EU-14y. Of which: deferred				
15. Of which: other forms				
16. Of which: deferred				
17. Total remuneration	320,583.10	6,045,643.16	4,329,879.74	2,795,070.04



Template 2: EU REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)
(Article 450 (1) (h)(v) to (vii) of the CRR)

	a. MB Supervisory function	b. MB Management function	c. Other senior management	d. Other identified staff
Guaranteed variable remuneration awards				
1. Guaranteed variable remuneration awards - Number of identified staff				
2. Guaranteed variable remuneration awards -Total amount				
3. Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap				
Severance payments awarded in previous periods, that have been paid out during the financial year				
4. Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff		1		
5. Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount		14,400.00		
Severance payments awarded during the financial year				
6. Severance payments awarded during the financial year - Number of identified staff				2
7. Severance payments awarded during the financial year - Total amount				180,443.64
8. Of which paid during the financial year				67,806.02
9. Of which deferred				112,637.62
10. Of which severance payments paid during the financial year, that are not taken into account in the bonus cap				10,199.56
11. Of which highest payment that has been awarded to a single person				93,744.08



Template 3: EU REM 3 – Deferred remuneration

(Article 450 (1) (h)(iii) and (iv) of the CRR)

	Deferred and retained remuneration							
	a. Total amount of deferred remuneration awarded for previous performance periods			d. Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	e. Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	f. Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	EU - g. Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	EU - h. Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
		b. Of which due to vest in the financial year	c. Of which vesting in subsequent financial years					
1. MB Supervisory function								
2. Cash-based								
3. Shares or equivalent ownership interests								
4. Share-linked instruments or equivalent non-cash instruments								
5. Other instruments								
6. Other forms								
7. MB Management function	5,578,964.77	1,354,657.80	4,224,306.97			531,598.20	3,035,881.20	2,731,562.87
8. Cash-based	2,263,045.67	581,154.24	1,681,891.43				1,994,754.24	
9. Shares or equivalent ownership interests	3,315,919.10	773,503.56	2,542,415.53			531,598.20	1,041,126.96	2,731,562.87
10. Share-linked instruments or equivalent non-cash instruments								
11. Other instruments								
12. Other forms								
13. Other senior management	1,403,564.75	209,832.66	1,193,732.09			19,205.37	74,937.70	420,079.42
14. Cash-based	141,675.23	31,325.30	110,349.93				31,325.30	
15. Shares or equivalent ownership interests	1,261,889.52	178,507.36	1,083,382.16			19,205.37	43,612.40	420,079.42
16. Share-linked instruments or equivalent non-cash instruments								
17. Other instruments								
18. Other forms								
19. Other identified staff	285,381.06	33,707.43	251,673.63			0.00	18,454.40	143,885.22
20. Cash-based	57,342.33	6,154.00	51,188.33				6,154.00	
21. Shares or equivalent ownership interests	228,038.73	27,553.43	200,485.30			0.00	12,300.40	143,885.22
22. Share-linked instruments or equivalent non-cash instruments								
23. Other instruments								
24. Other forms								
25. Total amount	7,267,910.58	1,598,197.89	5,669,712.69			550,803.57	3,129,273.30	3,295,527.51



Template 4: EU REM4 – Remuneration of €1 million or more per year

(Article 450 (1)(i) of the CRR)

Total remuneration: Remuneration payment band	a. Identified staff that are high earners as set out in Article 450(i) CRR
2,000,000 – 2,500,000	1

Template 5: EU REM5a - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) (I)

(Article 450 (1)(g) of the CRR)

	Management body remuneration			Business areas					
	a. MB Supervisory function	b. MB Management function	c. Total MB	d. Investment banking	e. Retail banking	f. Asset management	g. Corporate functions	h. Independent internal control functions	i. All other
Total number of identified staff									
2. Of which: members of the MB	8	6	14						
5. Total remuneration of identified staff	320,583.10	6,045,643.16	6,366,226.26	390,483.20	1,355,948.53		2,320,622.93	2,113,569.53	944,325.59
6. Of which: variable remuneration		2,623,648.65	2,623,648.65	142,106.00	360,161.56		736,800.08	482,737.00	170,938.00
7. Of which: fixed remuneration	320,583.10	3,421,994.51	3,742,577.61	248,377.20	995,786.97		1,583,822.85	1,630,832.53	773,387.59

Template 6: EU REM5b - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) (II)

(Article 450 (1)(g) of the CRR)

	Business areas						
	d. Investment banking	e. Retail banking	f. Asset management	g. Corporate functions	h. Independent internal control functions	i. All other	j. Total
Total number of identified staff	56						
3. Of which: other senior management	2	3		7	4	6	
4. Of which: other identified staff		5		4	11		