PILLAR 3 DISCLOSURES
OF OTP GROUP LUXEMBOURG
JUNE 2026

Content

1 INTRODUCTION

The Pillar 3 disclosures of OTP Group Luxembourg for June 2026 (hereinafter: the 'Disclosures') have been prepared in accordance with Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (hereinafter: the 'CRR') and its subsequent amendments, Directive 2013/36/EU (hereinafter: the 'CRD') and its subsequent amendments, Directive 2014/59/EU (hereinafter: the 'BRRD') and its subsequent amendments, as well as other relevant implementing regulations, technical standards, guides and guidelines governing disclosure requirements.

The Disclosures have been prepared by OTP banka d.d. (hereinafter: 'OBS' or the 'Bank'), as the largest financial institution in OTP Group Luxembourg, based on data as at 30 June 2026. The data in this document are disclosed at the level of OTP Group Luxembourg (the highest level of consolidation) and, where relevant, also at the level of OTP Group Slovenia (the sub-consolidated level of consolidation), hereinafter collectively referred to as the 'Group'.

OBS has the status of an other systemically important institution (O-SII), which means that, in accordance with Article 4(1), point (146)(b), of the CRR, it is treated as a large institution and, in accordance with Article 4(1), point (148), of the CRR, as a non-listed institution. Accordingly, the Bank is required to publish disclosures with the scope and frequency set out in Article 433a(2) of the CRR.

Obligation to disclose information

The Group is required to disclose material information which, if omitted or misstated, could change or influence the assessment or decision of a user relying on that information for business decisions. The applicable legislation permits the non-disclosure of information that is confidential or constitutes a trade secret.

The method, frequency and verification of the disclosure of material information are defined by OBS in the Disclosure Policy of OTP Group Slovenia. All disclosures are prepared on a consolidated basis and in EUR thousand, unless stated otherwise.

Regarding the frequency of disclosure, the Bank follows the rules set out in the EBA Signposting Tool. As a large non-listed institution, the Bank is required to disclose template EU KM1 - Key metrics and template EU KM2 - Key metrics - MREL. In accordance with the regulatory requirements, template EU KM2 is disclosed in this document only at the level of OTP Group Slovenia.

In accordance with Article 432 of the CRR, the Group does not disclose information that is not relevant to it, including entire templates or individual rows or columns within a template. The Group's Disclosures are not audited. The Group's Disclosures were approved by the Bank's Management Board.

In accordance with Articles 434 and 434a of the CRR, institutions publish the disclosures referred to in Part Eight of the CRR centrally through the European Banking Authority (EBA) via the Pillar 3 Data Hub (P3DH), which provides a single electronic access point for public access to disclosures (https://www.eba.europa.eu/risk-and-data-analysis/pillar-3-data-hub). The Group also publishes the Disclosures on the Bank's website, https://www.otpbanka.si, in Slovenian and English, in the section intended for investors. The presented Pillar 3 disclosures include both quantitative and qualitative information.

2 DISCLOSURE OF KEY METRICS

(Points (a) to (g) of Article 447 and point (b) of Article 438 of the CRR)

The Group must comply with the following minimum Pillar 1 own funds requirements set out in the CRR:

- Common Equity Tier 1 (CET1) capital ratio of at least 4.5%;
- Tier 1 capital ratio of at least 6.0%; and
- total capital ratio of at least 8.0%.

In addition to the minimum capital requirements under the CRR, the Group must also comply with the capital requirements set out under the CRD framework and determined by the competent supervisory authorities:

- Pillar 2 requirement (P2R);
- Pillar 2 guidance (P2G); and
- the combined buffer requirement (CBR).

The minimum capital requirements under the CRR together with the Pillar 2 requirement (P2R) constitute the total SREP capital requirement (TSCR), while the TSCR increased by the combined buffer requirement (CBR) constitutes the overall capital requirement (OCR) to be met by the Group.

In accordance with the regulatory requirements, at least 56.25% of the P2R must be met with Common Equity Tier 1 (CET1) capital and at least 75% with Tier 1 capital. The combined buffer requirement (CBR) must be met entirely with CET1 capital. As shown in template EU KM1, the minimum required TSCR ratio for OTP Group Luxembourg as at 30 June 2026 is 10.00%, while the OCR ratio is 13.51%. The CBR is 3.51% and comprises the capital conservation buffer of 2.50% and the institution-specific countercyclical capital buffer of 1.01%. For OTP Group Slovenia, the minimum required TSCR is 10.00%, while the OCR ratio is 14.64%. The difference of 1.13 percentage points in the OCR requirement between OTP Group Luxembourg and OTP Group Slovenia results from the other systemically important institution buffer of 1.0% and the systemic risk buffer of 0.13% relating to sectoral exposures, which are binding only at the level of OTP Group Slovenia.

In addition to the above requirements, the Group must also comply with Pillar 2 Guidance (P2G) of 1.25% of the total risk exposure amount. This requirement must be met with CET1 capital.

The calculation of regulatory capital includes only capital instruments for which all necessary supervisory approvals have been obtained.

As at 30 June 2026, OTP Group Luxembourg and OTP Group Slovenia comply with the capital requirements set out in the applicable legislation or determined by the supervisory authorities.

Template EU KM1 presents the key metrics of OTP Group Luxembourg referred to in points (a) to (g) of Article 447 of the CRR as at 30 June 2026, compared with 31 December 2025 and 30 June 2025.

Liquidity and capital adequacy remain at adequate levels. Additional details are provided in the subsequent chapters.

The Group continues to operate normally, while closely monitoring the global developments.

Template EU KM1 - Key metrics of OTP Group Luxembourg

EUR 000, %

		30.06.2026	31.12.2025	30.06.2025
Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	1,560,233	1,557,022	1,478,055
2	Tier 1 capital	1,560,233	1,557,022	1,478,055
3	Total capital	1,600,436	1,601,111	1,528,212
Risk-weighted exposure amounts				
4	Total risk exposure amount	8,286,763	7,880,667	7,558,603
4a	Total risk exposure pre-floor	8,286,763	7,880,667	7,558,603
Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	18.83%	19.76%	19.55%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	18.83%	19.76%	19.55%
6	Tier 1 ratio (%)	18.83%	19.76%	19.55%
6b	Tier 1 ratio considering unfloored TREA (%)	18.83%	19.76%	19.55%
7	Total capital ratio (%)	19.31%	20.32%	20.22%
7b	Total capital ratio considering unfloored TREA (%)	19.31%	20.32%	20.22%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)				
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.00%	2.00%	2.00%
EU 7e	of which: to be made up of CET1 capital (%)	1.13%	1.13%	1.13%
EU 7f	of which: to be made up of Tier 1 capital (%)	1.50%	1.50%	1.50%
EU 7g	Total SREP own funds requirements (%)	10.00%	10.00%	10.00%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	1.01%	1.01%	0.99%
EU 9a	Systemic risk buffer (%)	0.00%	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%
11	Combined buffer requirement (%)	3.51%	3.51%	3.49%
EU 11a	Overall capital requirements (%)	13.51%	13.51%	13.49%
12	CET1 available after meeting the total SREP own funds requirements (%)	9.31%	10.32%	10.22%
Leverage ratio				
13	Total exposure measure	16,644,547	16,357,427	15,911,302
14	Leverage ratio (%)	9.37%	9.52%	9.29%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)				
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%
EU 14b	of which: to be made up of CET1 capital (%)	0.00%	0.00%	0.00%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)				
EU 14d	Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%
Liquidity Coverage Ratio				
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	5,226,036	5,415,299	5,481,286
EU 16a	Cash outflows - Total weighted value	1,899,337	1,904,137	1,820,127
EU 16b	Cash inflows - Total weighted value	484,582	463,774	432,831
16	Total net cash outflows (adjusted value)	1,414,756	1,440,364	1,387,296
17	Liquidity coverage ratio (%)	372.04%	377.90%	401.77%

		30.06.2026	31.12.2025	30.06.2025
Net Stable Funding Ratio				
18	Total available stable funding	13,002,293	12,885,570	12,561,690
19	Total required stable funding	7,546,247	7,192,907	6,948,815
20	NSFR ratio (%)	172.30%	179.14%	180.77%

3 MREL

(Article 447(h) of the CRR and Article 45i(3), points (a) and (c) of the BRRD)

The Bank Recovery and Resolution Directive (BRRD) requires banks in EU Member States to maintain the minimum requirement for own funds and eligible liabilities (MREL), ensuring credible resolution through sufficient loss-absorption and recapitalisation capacity. The preferred resolution strategy (PRS) for OTP Group Slovenia is based on a multiple point of entry (MPE) approach.

As of 30 June 2026, the Bank must, on a consolidated basis at the level of the OBS resolution group, comprising OTP banka, OTP faktoring, SKB Leasing and SKB Leasing Select, comply with (1) an MREL TREA requirement of 21.67% of the total risk exposure amount (TREA), increased by the applicable combined buffer requirement (CBR), and (2) an MREL TEM requirement of 5.90% of the total exposure measure for the leverage ratio (LRE/TEM).

As of 30 June 2026, the Group complies with the MREL requirements determined by the supervisory authorities. At that date, the MREL TREA ratio was 30.09% and the MREL LRE ratio was 14.99%.

The Group has fully integrated the MREL requirements into its overall risk management and monitoring system.

Template EU KM2 presents the key metrics of OTP Group Slovenia as at 30 June 2026, as required under Article 447(h) of the CRR and Article 45i(3), points (a) and (c), of the BRRD.

Template EU KM2 - Key metrics Table of OTP Group Slovenia

EUR 000, %

		Minimum requirement for own funds and eligible liabilities (MREL)
		30.06.2026
Own funds and eligible liabilities, ratios and components		
1	Own funds and eligible liabilities	2,494,742
EU-1a	Of which own funds and subordinated liabilities	1,696,877
2	Total risk exposure amount of the resolution group (TREA)	8,290,886
3	Own funds and eligible liabilities as a percentage of TREA (row1/row2)	30.09%
EU-3a	Of which own funds and subordinated liabilities	20.47%
4	Total exposure measure of the resolution group	16,648,010
5	Own funds and eligible liabilities as percentage of the total exposure measure	14.99%
EU-5a	Of which own funds or subordinated liabilities	10.19%
6a	Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption)	
6b	Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities instruments If the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption)	
6c	Pro-memo item: If a capped subordination exemption applies under Article 72b (3) CRR, the amount of funding issued that ranks paripassu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks paripassu with excluded Liabilities and that would be recognised under row 1 if no cap was applied (%)	
Minimum requirement for own funds and eligible liabilities (MREL)		
EU-7	MREL requirement expressed as percentage of the total risk exposure amount	21.67%
EU-8	Of which to be met with own funds or subordinated liabilities	-
EU-9	MREL requirement expressed as percentage of the total exposure measure	5.90%
EU-10	Of which to be met with own funds or subordinated liabilities	-