



# Sustainability Report 2021

# Contents

<b>About the Report</b>	<b>3</b>
<b>CEO's Welcome</b>	<b>5</b>
<b>OTP Bank Romania S.A</b>	<b>6</b>
<b>1. Our Approach to Sustainability</b>	<b>11</b>
<b>2. Responsible Corporate Governance</b>	<b>14</b>
<b>3. Responsible Finance</b>	<b>16</b>
3.1 Responsible customer service	17
3.2 Responsible marketing communication	17
3.3 Improving accessibility via digital channels	18
3.4 A new branch, under an innovative concept	22
3.5 Improving financial literacy	23
<b>4. Financial services committed to sustainability</b>	<b>24</b>
4.1 Maximize customer satisfaction with minimum physical interaction	25
4.2 Households and residential communities	25
4.3. Micro, small and medium-sized business customers	26
4.4 Large Corporate projects	28
4.5 Agro Sector Customers	28
4.6 Portfolio components by sector	29
4.7 ESG factors integration in credit risk	30
<b>5. Ethical business behavior and security</b>	<b>31</b>
5.1 Compliance Function	32
5.2. Cyber security	35
<b>6. Responsible employer</b>	<b>36</b>
<b>7. Environmental protection</b>	<b>44</b>
<b>8. Local Community</b>	<b>46</b>
<b>GRI index</b>	<b>51</b>

# About the Report



## GRI 102-54

### About the Report

This Report is OTP Bank Romania SA Sustainability Report for the 2021 reporting period. The Report has been prepared in accordance with the GRI Standards 2016: Core option<sup>1</sup>

We issue our Sustainability Report annually. We have been conducting this CSR report since 2008, except for 2017.

## GRI 102-10, 102-45, 102-50, 102-52, 102-56

### Characteristics of the Sustainability Report

Entities included: OTP Bank Romania and

subsidiaries:  
OTP Consulting, OTP Leasing IFN,  
OTP Advisors, OTP Factoring,  
OTP Asset Management,  
OTP Bank Romania Foundation

Reporting period - 2021 calendar year  
Time horizon of data presented - 2021 and the preceding four years as possible  
Reporting cycle - annual

Reporting standard - GRI Standards 2016

Date of most recent report January 2021 for year 2020

## GRI 102-46

### Criteria applied in defining the report content and topic Boundaries:

1. Information that may be of interest to stakeholders;
2. Aspects deemed material by the management of OTP Bank;
3. Information used as input for ESG (Environmental, Social, Governance) ratings;
4. Information necessary for compliance with the GRI Standard (including compliance with the materiality principle).

## GRI 102-47, 103-1

### List of the material topics of OTP Bank Romania

- Socioeconomic compliance
- Labour/management relations
- Anti-corruption
- Occupational health and safety
- Economic performance
- Security practices
- Preventing anticompetitive behavior
- Product portfolio (sector-specific)
- Marketing and labelling
- Employment
- Customer privacy
- Local communities
- Market presence
- Diversity and equal opportunity
- Non-discrimination
- Environmental compliance
- Public policy
- Emissions
- Indirect economic impacts
- Energy
- Training and education



1 - The GRI (Global Reporting Initiative) is the most widely recognised and applied sustainability reporting framework at the international level.

## GRI 103-1

Material topics presented in the report were defined at OTP Group level in accordance with the criteria of the materiality principle. They were revised in 2018 based on the results of an extensive stakeholder survey run in all countries including Romania (see Sustainability Report 2020, p.15)

Both managers and external stakeholders have expressed that product responsibility and compliance are the most important sustainability fields for OBR (OTP Bank Romania), and that labour issues also have to play a key role. For external stakeholders human right issues proved to be very important and more significant than for managers. Managers evaluated economic topics higher than external stakeholders, for whom this is the least important from a sustainability point of view besides achievements and results, we present challenges faced and the directions of potential development in order to give a balanced view on our performance.

In the content of the report, the sustainability performance in relation to our core business is of priority. Information is to be presented in a clear and easily understandable way.

The chapters of the report follow our main stakeholders: clients, employees, environment and communities. We highlight our efforts in order to enhance

the financial awareness of the youth.

A comprehensive insight into OTP Bank Romania's operations is also facilitated by our reports, which are available on the company's website: <https://www.otpbank.ro/ro/despre-otp-bank/despre-noi/rapoarte-anuale-otp-bank>. The Annual Report incorporates the non-financial statement in compliance with statutory requirements.

1 - The GRI (Global Reporting Initiative) is the most widely recognised and applied sustainability reporting framework at the international level.

## Report Boundary

### GRI 102-10

In 2021 the scope of entities included in the report expanded compared to previous years as a result of our transition to the consolidation circle, thus including OTP Bank Romania subsidiaries.: OTP Consulting, OTP Leasing IFN, OTP Advisors, OTP Factoring, OTP Asset Management, OTP Bank Romania Foundation

### GRI 305-1,305-2

Consolidation approach applied for the topic of GHG emissions: operational control.

When presenting non-quantifiable information and practices, we always specify the companies to which they refer.



# CEO's Welcome

As we started 2021, after a 2020 in which we have faced full on the impact of the global coronavirus pandemic, I hoped for a year with less unexpected challenges and extraordinary circumstances, so we can direct our energy and efforts fully towards our journey and our customers.



It soon became clear that all the measures we have implemented in 2020 will need to be kept in force, **as our main priority was to first ensure a safe working environment for us, for our colleagues, and seamless services for our customers** maintaining our focus in facilitating access to SME Invest funding that supports national economic resilience and continue the options of postponing the payments of the installments up to nine months as per moratorium for those who did not fully apply in 2022.

I would like to show my gratitude to all our colleagues for understanding the situation and for following precautions in such a responsible manner. And a special mention to our response teams, that managed to keep us safe during each wave of this pandemic and made sure all measures to limit the impact of the virus were in place. All starting from the much-

needed protective materials, up until the informational campaigns they have deployed, and the support counselling services they provided.

With all these developments, we did not deviate from our objectives, working on all our development programs and following our customer centric approach, as we continued to deliver well designed banking services. On top of our operational performance and good financial standing, we made progress on other important business directions, such as governance and sustainability.

As subsidiary of OTP Group that signed in 2021 the Principles for Responsible Banking, joining the industry efforts to enhance sustainable practices, we will **continue to provide and promote sustainable banking operations, in line with the vision of the Sustainable**

## Development Goals and the Paris Climate Agreement.

Closely connected to this, we have also made significant operational steps, as the OTP Group has launched the Environmental, Social and Governance (ESG) Strategy, which will guide us in providing responsible financial services and ethical, environmentally-sound financial products in the region. Country level, OTP Bank Romania has already begun the process of defining the local sustainability priorities and embed the ESG best practices across the company.

Sustainable progress, be it financial or social, is only possible through education and direct involvement in communities. We know it and have been acting on this for 7 years now through the OTP Bank Foundation, and in order to adapt to the informational and educational needs of the active generations, in line with our future ESG commitments,

it also went through important structural changes. The activity is in full development, and the OTP Foundation is now on the important journey of transforming from a financial education provider into an educational content creator. So, building on the OTP Bank Foundation projects that impacted hundreds of professors and thousands of pupils through the years, we push through with projects like the national digital educational program „Online Lesson”, „Neuroscience in the classroom”, European funded “Manager in action” program or the financial education program for adults, “Fitness Financiar”. They all contribute and help us build up financial literacy and proficiency and we are committed in increasing their reach every year.

Kind regards

Gyula Fatér  
Chairman of the Management Board and CEO

Stability

Profitability

Growth

Innovation

# OTP Bank Romania



## GRI 201: GRI 103-1,103-2,103-3

Present on the Romanian banking market for over 17 years, OTP Bank is an universal bank, providing complete financial solutions on both private individuals and companies. OTP Group is present in Romania since 2004 through: OTP Bank Romania, OTP Consulting, OTP Leasing IFN, OTP Advisors, OTP Factoring, OTP Asset Management, OTP Bank Romania Foundation. As at the end of 2021, OTP Bank served 290.645 customers.

## GRI 102-2, GRI 102-6

OTP Bank engages in the provision of universal financial services, always aiming to leverage development potentials and responding to market conditions. In addition to retail customers, we also intend to serve enterprises and corporations.

Serving agricultural companies and micro, small and medium-sized enterprises is a priority for us.

### OTP Bank Romania

Number of branches **97**

Number of employees **1,861**

Total assets **18.464,163 mn RON**

Market share **4.2%**

### Summary ESG data of OTP Romania (2021)

Percentage of women on the Supervisory Board	44,44%
Percentage of women on the Board of Directors	40%
Percentage of women in senior management	40%
Taxes paid	8.037.000 RON
Corporate income tax (adjusted, paid)	19.787.000 RON
Amount of donations	5.000 RON
Amount of Sponsorships	1.944.000 RON
Number of customers – total	290.645
Number of retail customers	289.158
Number of corporate customers	1.487
Young customers <sup>1</sup>	34.926
Micro and small enterprise assets	2.514,81 mn RON
Medium and large corporation assets	3.880,86 mn RON
Accessible branches and customer offices	97
Number of participants in the financial education trainings of OTP Bank Romania Foundation	1000
Number of employees (as at 31/12)	1861
Percentage of women	68,91%
Training hours	43.081
Energy consumption (Mwh)	5.310
Energy consumption per employee (Mwh)	2.85
Electricity CO2 emission factor (tCO2e/GWh)	263.36
Electricity CO2 emission per employee (tCO2e)	0,14
Natural gas/district heating CO2e emission factor (tCO2e/GJ)	0,10363
Natural gas/district heating CO2 emission per employee(tCO2e)	0,00005

\*1 - Young persons under 26 years, as retail customers

## OTP Group

Number of branches	1,483
Number of employees <sup>1</sup>	40.315
Total assets	HUF 27,553 billion
Market capitalisation	HUF 4,648 billion

## OTP Bank Ukraine

Number of branches	85
Number of employees	3,040
Total assets	HUF 984 Billion
Market share <sup>4</sup>	4.3%

## OTP Bank Russia

Number of branches	135
Number of employees	8,911
Total assets	HUF 800 Billion
Market share	0.4%

## OTP Bank Romania

Number of branches	97
Number of employees	1,861
Total assets	HUF 1,438 Billion
Market share	4.2%

## OTP Core<sup>2</sup> (Hungary)

Number of OTP Bank branches	356
Add'l branches/offices of Core members	36
Number of employees	10.776
Total assets	HUF 14,207 Billion
Market share <sup>3</sup>	33.6%

## OTP Bank Moldova

Number of branches	52
Number of employees	901
Total assets	HUF 311 Billion
Market share	19.4%

## SKB Bank (Slovenia)

Number of branches	48
Number of employees	908
Total assets	HUF 1,433 Billion
Market share	11.5%

## OTP Bank Serbia

Number of branches	184
Number of employees	2,789
Total assets	HUF 2,225 Billion
Market share	19%

## DSK Bank (Bulgaria)

Number of branches	302
Number of employees	5,709
Total assets	HUF 4,627 Billion
Market share	30.7%

## OTP Bank Croatia

Number of branches	114
Number of employees	2,493
Total assets	HUF 2,576 Billion
Market share	13.3%

## OTP Bank Albania

Number of branches	39
Number of employees	469
Total assets	HUF 351 Billion
Market share	10.7%

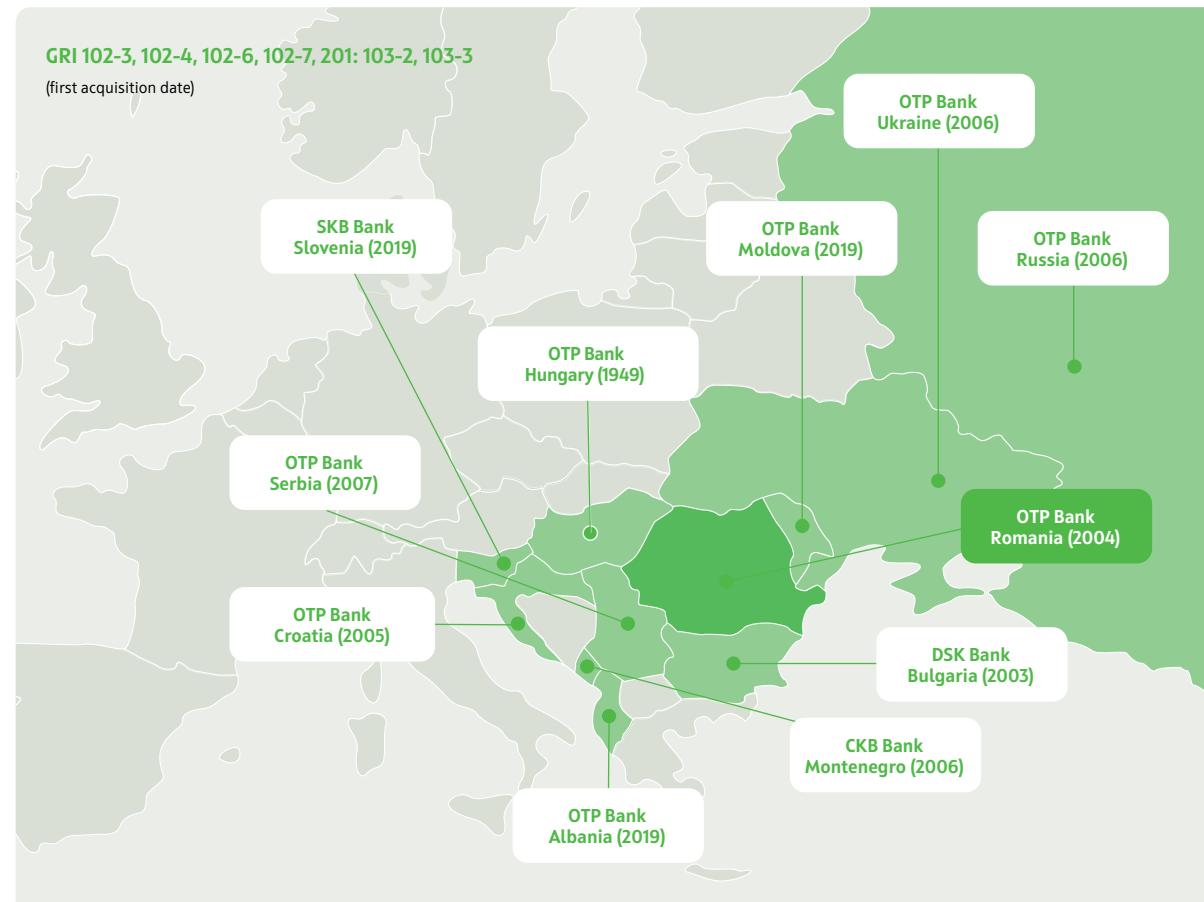
## CKB (Montenegro)

Number of branches	34
Number of employees	518
Total assets	HUF 514 Billion
Market share	30.5%

### Data (audited, IFRS) pertaining to 31/12/2021 or 2021.

- number of total actively employed, with full-time and part-time staff combined in each case.
- OTP Core: OTP Bank, OTP Jelzálogbank, OTP Lakástakarék, OTP Faktoring, OTP Pénzügyi Pont, OTP Kártyagyártó, OTP Ingatlanüzemeltető, Monicomp, OTP Ingatlanpont, OTP Mobil, OTP eBIZ; in the case of financial data, including OTP Otthonmegoldások Kft. and enterprises engaged in Group financing. It does not include the data of other Hungarian subsidiaries.
- share of OTP Core and Merkantil.
- in each case, market share refers to the share of retail loans. The data of foreign subsidiaries are also Group-level. The definition of branches differs from that included in the Annual Report.

GRI 102-3, 102-4, 102-6, 102-7, 201: 103-2, 103-3  
(first acquisition date)





## Our ESG Ratings

OTP Bank Romania's Environmental, Social and Governance (ESG) performance is rated by a number of agencies.



**47** of OTP Bank branches are in economically or socially disadvantaged regions<sup>2</sup>

<sup>2</sup>The branches from the economically or socially disadvantaged regions were considered to be those with a population of less than 100,000 inhabitants.



**RON 8.037.000**  
paid in taxes



**79%** wheelchair accessible branches



**RON 5.395.000**  
allocated to employee training



**21.972**  
Total active housing loans



**RON 196.884.000**  
in the loan portfolio EOY 2021 allocated to utilisation of renewable energy



**At Online Banking Gala, organized by Finmedia, OTP Bank Romania received three awards:**

**Best Performance in Internet Banking:**

1. General - The highest percentage increase in the total number of active individual customers by 2020
2. Medium banks category - The highest number of transactions by 2020

**Best Performance in Mobile Banking:**

3. Medium banks category - The largest number of customers of the mobile banking service.

**Our main awards – with a focus on corporate responsibility**

**The best performing local investment fund, with exposure in Romania in 2020**

for the OTP Global Mix Class L fund. The award was given to OTP Asset Management by the Bucharest Stock Exchange at the ISEY Gala, a gala dedicated to capital market performers in 2020.

**The best performing fund in 2021**

for OTP Expert. The award was given to OTP Asset Management at the Financial Market Awards Gala, XXVI edition.

**The best performing bond fund in 2021**

for OTP Bonds. The award was received by OTP Asset Management at the Financial Market Awards Gala, XXVI edition

**CUSTOMERS' FRIEND – SUPERIOR EXCELLENCE**

OTP Bank Romania received this recognition from ICERTIAS, a program/project that awards companies providing their customers with a proven premium experience on the market, following market research according to internationally recognized research methods.

**Women who change Romania**

At "Women who change Romania" Gala, organized by Finmedia, Maria Ghetea from OTP Bank Romania received Women who change Romania award.

**Excellence Award**

At Romanian Leasing Gala, OTP Leasing Romania received this distinction is based on OLR's successful teams efforts to launch the Agricultural Finance Division, positioning the company in a well regarded place among the financing companies in the field and launching new partnerships.

**eInnovation Award**

This distinction was offered for the innovative projects OTP Leasing Romania team carried out in the Digital field, such as launching Eliza, the first chatbot of a leasing company in Romania.

**Excellence Award**

At Gala Digital Transformation, this distinction was offered for OTP Leasing Romania team's projects in the area of digital transformation and optimization of OTP Leasing services (such as online boarding platform and the chatbot).

**eProduct**

At eFinance Gala, organized by Finmedia, OTP Bank Romania received the eProduct award for OTPdirekt.

**OTP Group's ESG performance**

OTP Group's Environmental, Social and Governance (ESG) performance is rated by a number of agencies. See [OTPH Sustainability Report 2021](#)

# 1. Our Approach to Sustainability



**To us, sustainable, prudent and ethical operation means fair and customer-oriented service provision, responsible and transparent governance, and a responsible employer's and active social involvement.**

**OTP Bank Romania will continue to strengthen its sustainability culture by implementing in 2022 a new strategic framework designed to embed Environment, Social and Governance (ESG) best practices across the company, with final scope of supporting sustainable economic increase and improving the life quality for present and future generations.**

With a dedicated team overseeing the ESG strategy development and implementation, the organization is committed to investing in required resources to achieve this objective alongside with agile transformation organic growth plan. The OTP Bank ESG strategy will focus on three key pillars: product, planet, people, described in 3 areas of responsibilities: Responsible provider, Responsible employer, Responsible social actor.

**Recent social, economic and environmental turmoil, have raised the ESG agenda in the list of priorities, integrating respect for the planet and people as a central point in decision-making models and business strategy. OTP Bank is thoroughly analysing all implications to build an accurate, effective ESG strategy, in line with the company's vision, wisely and deeply engaging the company's portfolio. Both internally and externally, we focus on becoming green challengers on all targeted levels.**

**Simultaneously with its own transformation and organic growth program, Apollo, OTP Bank Romania will continue to identify and implement actions likely to create sustainable communities, involved in economic, social and environmental progress (employees, customers, partners and collaborators).**

**OTP Bank's long-term investment plan in digitization and customer experience started in 2019.**

**OTP Bank business model stands for an agile, proactive, modern, and customer-centered approach, in line with the organizational culture of the company.**



**GRI 103-1, 203: 103-2, 103-3, 203-2**

The 17 Sustainable Development Goals (SDG) formulated by the UN set up a new, universal measure for development by 2030. Taking a stand for the elimination of poverty, the fight against climate change and the reduction of inequalities.

As demonstrated by its sustainability focal points and objectives, OTP Group is committed to facilitate the SDGs. Our activities impact – or support the achievement of – SDG objectives and indicators\* as follows.



\*The sub-goals and indicators are global or national, the contribution to achieving these goals is indirect at the company level. It is even more indirect in case of financial institutions, which can contribute to achieving a number of goals by making the financial resources available.

**13 Our Approach to sustainability**

**GRI 201: 103-1, 103-2, 103-3**

**Lending, investment**



Our loan and investing activities facilitate purchases, consumption, and capital projects by disbursing depositor funds responsibly. As a result, we have an impact not only on our clients, but also, indirectly, on economic growth, the living standard of the population, and the

delivery of such basic needs as granting housing opportunities. Our credit approval method ensures prudent lending in order to protect our depositors' funds and prevent unnecessary over-indebtedness. We provide items that are in line with our clients' real unique needs. Access to financing schemes funded by governmental and international institutions is a priority for OTP Bank Romania.

**GRI 413: 103-1, 103-2, 103-3**

**Access to financial services**



As an organisation that promotes inclusive finance, we maintain explicit guidelines to respect both equal

opportunity values and social solidarity. To reach people equally, we make our banking services available to everyone, especially those who reside in disadvantaged communities or encounter financial difficulties.

**GRI 203, 413: 103-1, 103-2, 103-3**

**Improving financial literacy**



Financial products and services are often complex; however, their understanding and basic financial literacy are indispensable for making sound financial decisions and achieving the defined objectives.

We strive to use clear and plain language in all of our communications. OTP Bank Romania Foundation provides free finance and economics courses, helping thousands of students and adults to expand their knowledge.

**GRI 202, 401: 103-1, 103-2**

**Employment**



OTP Bank Romania is a major employer in Romania. Half of the top banks

reduced their workforce in the second year of the pandemic, according to Economica. net analysis, but OTP Bank Romania increased their workforce in 2021.

**GRI 413: 103-1, 103-2**

**Local Communities**



OTP Bank is an organic part of society

and local communities. In line with our values, we play an active role in the progress of local communities and in supporting disadvantaged persons.

## 2. Responsible Corporate Governance





**GRI 202: 103-2, 103-3, 405: 103-2, 103-3**

**Diversity**

When OTP Bank delegates members to its management bodies (Board of Directors, Supervisory Board) or members of the Board of Directors and executive management (Management), it considers professional qualifications and experience, high-level human and management competencies, a varied educational background, wide-ranging business experience and professional reliability as essential factors; at the same time, OTP Bank is also strongly committed to taking efficient measures in corporate operations to ensure diversity, including the continuous improvement of the participation of women.

**Sustainability Management**

OTP Bank's Marketing and Communication Directorate is responsible for the operative management of OTP Bank's CSR/ sustainability activity and is headed by the Director of Marketing and Communication.

Our bank has a designated responsible manager. The assessment of the implementation of the sustainability targets is performed by the Director of Marketing and Communication. In addition, in 2021 OTP Bank started designing the ESG strategy & related tasks organization across company.

Board of Directors		Management	
Proportion of locals	Proportion of women	Proportion of locals	Proportion of women
60	40	60	40

**GRI 102-18**

**Group governance**

OTP Bank Romania employs matrix governance practices so that its governance can be based on standardised principles of OTP Group, but also takes local specificities into consideration. We distinguish between three main types of governance: shareholder (corporate law), group-level and professional governance functions. Governing bodies and local management play a key role in decision making and execution, which combine central and local expertise.

The detailed rules of group governance are defined in the Banking Group Governance Regulation. The highest decision-making bodies of group governance are the Bank's standing committees. Standing committees are set up within the competence of the Board of Directors. Other committees are set up on a mandatory basis pursuant to the Act on Credit Institutions and Financial Enterprises



# 3. Responsible Finance





## GRI 203, 413, 417: 103-1, 103-2, 103-3

### Commitment:

We believe that the general public should be equipped with the knowledge needed for financial well-being, as well as the conditions for responsible cash management, such as access to financial services.

### Approach:

Our banking group actively assists clients in making prudent financial decisions. We offer outstanding service and a wide range of assets, including loans and leases as well as deposit accounts. Our goal is to assist our customers throughout their relationship with us, helping them continue to make wise financial choices. Since financial services create opportunities, we consider broadbased and diverse accessibility important.

### Activity

- Extensive availability online and in person
- Advisory attitude in serving customers
- Clear information and awareness raising
- Responsible marketing and sales
- Accessibility

The role of online services and cashless payment options has clearly gained a new significance in 2021. Our goal is to take advantage of our customers' increased openness to digital solutions. During the year we upgraded our existing services in numerous areas, as well as our back-office processes to make them even more easy- to-use, quick and safe.

## Responsible Customer Service

The OTP Group approaches Responsible Customer Service from a variety of angles and with a range of expectations. For many years, our top priority have been the dissemination of accurate information and the enhancement of financial literacy. Improving financial literacy has been OTP Group's most visible and influential corporate social responsibility.

In addition to provide the opportunity of quick and convenient banking, digitization considerably boosts service accessibility. We are working to ensure that these chances are successfully provided; members of the senior generation, as well as those who are socially or economically disadvantaged, must be able to take use of them - and do so intelligently.

## 3.1. Customer satisfaction

### GRI 102-43,102-44

Customer satisfaction is a material and indispensable element of responsible service provision; however, responsible and sustainable operation necessarily points beyond the activities aimed at the improvement of satisfaction.

Customer focus is a strategic objective of our Bank, and we strive to implement this objective in designing both our products, and our high quality skilled services aligned with expectations.

We research the requirements of our customers in numerous ways; we continuously survey their feedback in relation to a product, a service or a factor, and integrate it into our developments.

CX metrics in Customer service HUB:

- First Call Resolution per inbound call >90% in 2021
- After call customer survey result is 4,5 average in 1 to 5 for scoring scale
- No of complaints/no.of clients decreased from 0.03% in Q1 to 0.02% in Q4, 2021

CX metrics in Branches:

- Service Quality Monitoring result in branch raised over 90% on CSAT TOP 2 BOX (satisfied and very satisfied) in Q4, 2021

Digital platforms are stable and available for the customers: otpdirekt.ro and otpbank.ro have availability higher than 99%

## 3.2 Responsible marketing

### communication. GRI 417: 103-2

Responsible communication is a critical component of providing excellent customer service. As digital services gain traction, it becomes even more necessary to guarantee that the information and materials offered on online platforms are correct, intelligible, and clear so that customers may make educated judgments to the greatest extent possible. We present realistic goals in our credit communication and do not tempt customers to engage in irresponsible consumption and excessive borrowing. We believe it is critical to go above the legal obligations in order to promote responsible communication.

In 2021, we continue our brand image campaign with the motto #peoplewithpassions formulating strong, motivating messages to customers and colleagues in order to encourage them to express their diverse talents and hobbies.

### Plain language

In 2021, OTP Group issued the Tone of Voice Manual for foreign subsidiaries as well. The Manual provides guidance regarding the communication style of OTP Group. Our website, customer information documents, marketing materials, e-mails and letters to customers, as well as our system messages are all prepared in accordance with the requirements of plain language in communication. In 2021 we modified several standard form packages of the Bank to reflect the requirement of plain language.

### 3.3 Improving accessibility via digital channels

#### 100% Online Personal Loan

The Bank continues to operate in a prudent and transparent manner and is constantly innovating to provide a full range of financial services of the highest quality, and in 2021 it launched new products with the same agility. This is the case for the 100% online personal needs loan, the possibility to open an online account, the Contactless ATM service for cash withdrawals from Bank ATMs or the OTP POSibil service, a solution that allows Bank cards to be accepted for payment and use a mobile phone instead of a POS.

Appealing to customers, the Bank targets a higher penetration of internet and mobile banking, a higher usage of online channels for sales, in an overall effort to augment digitalization. The Bank will also rely on direct sales agents, a flexible and mobile sales force.

#### 100% Online Cash loan

OTP Bank continued the strategy of digital development of the portfolio and in March launched a new lending product, the 100% Online Cash loan in RON for new to Bank customers, with current account opening in the same flow (OBR was 2nd Bank in Romania offering an 100% online cash loan for new to Bank customers, with current account opening in the same flow). It is addressed to the customers who need a faster financing option and want a more effective way to interact with the Bank. The approval and loan disbursement takes about 30 minutes.

#### 100% online Micro & SME onboarding

In the same direction of increasing digitalization, in November 2021 we launched (silent launch phase for the moment) a

digital platform for 100% online Micro & SME onboarding – covering 10 packages & Black Friday offer. Thus, in a fully online process, companies registered in the Romanian Trade Registry & having a unique shareholder, can perform KYC to become OBR clients and open current accounts (in RON, EUR & HUF), business card, Internet Banking & POS (physical or softPOS or e-commerce).

#### OTPosibil

We continued to align the products and services of OTP Bank Romania dedicated to SME clients and private entrepreneurs to the general digitalization trends in order to provide the fastest and most appropriate financing and operational solutions through a various range of alternative channels. In this respect, we have implemented the digital solutions portfolio offered to local customers by launching the OTP POSibil service, an innovative solution that allows Bank cards to be accepted for payment and mobile phones to be used instead of a POS. Through OTP POSibil, OTP Bank supports local businesses, offering a tool that allows on-the-spot payment acceptance operations, without the need for a classic POS terminal and without additional maintenance costs or consumables. The application is compatible with mobile terminals with Android operating system, mobile phone or tablet, and is optimal for use in courier and delivery activities, taxi transport services and entrepreneurial activities, where business mobility is a key factor. OTP POSibil is implemented in partnership with Mastercard and Visa and incorporates the technology generically called „SoftPOS”, which offers mobility, speed and flexibility in the payment acceptance of contactless Bank cards and alternative payment devices, equipped with NFC technology, all while facilitating collection operations.



#### Internet Banking, SmartBank, Contact Center, SMS Alerts and Push Notification

OTPdirekt is a high-quality service package, which perfectly fits the modern lifestyle. It is a comfortable, omnichannel, fast and secure alternative that allows customers to carry out transactions and receive information about their accounts without having to come to the bank's territorial units, in conditions of utmost security. OTPdirekt is the service through which OTP BANK ROMANIA offers its clients the possibility to access their banking accounts 24 hours a day, through four channels.

#### 1. OTPdirekt – Internet Banking (transactions and information)

Available 24 hours out of 24, 7 days a week, the Internet Banking service brings all the information about the customer's accounts to the distance of a click. The commissions for payments can be up to two times smaller than those in OTP BANK ROMANIA's territorial units, while the account balance interrogation and the account statement are free of charge. The following functions are available through the Internet Banking service:

- check account balance;
- check transaction history;

- RON or foreign currency transfers to beneficiaries' accounts;
- standing orders;
- foreign exchanges;
- transfers between client's own accounts;
- open/view/close deposits;
- bank account statement file export or send by email possibility;
- special payment templates for utility bills;
- detailed information about loans, insurance policies, incoming and outgoing debit instruments and collateral deposits (through Electronic RM menu);
- importing domestic or foreign payments from a file (e.g. inter-banking payments, payments representing treasury rates and taxes, transfers to beneficiaries with accounts opened at OTP BANK ROMANIA etc.);
- creating templates for domestic payments;
- creating templates for foreign currency payments;
- sending and receiving messages to/from the bank;
- change card limits, online payment on/off switch, report lost/stolen card, reset card PIN, request card reissue, block card temporarily on/off switch, show card details;
- personal financial tool MyMentor; settings budgets and new goals, transaction categorization;
- open new current account;
- open new savings account;
- automatic savings tool;
- reset or unblock the internet banking access code;
- SMS Alerts and Push Notification configuration;
- Money Magnet: transferring money from other banks to OTP BANK ROMANIA accounts, using debit cards issued by other banks in Romania;
- subscription and redemption of investment funds;

- personal data update;
- nearest ATMs or branches by client location.

## 2. OTPdirekt – SmartBank (transactions and information)

A secured application downloadable from Google Play or Apple Store that allows clients to access information about their financial situation and to make transactions via a smartphone.

The following functions are available:

- check account balance;
- check transaction history;
- RON or foreign currency transfers to beneficiaries' accounts;
- transfers between client's own accounts;
- foreign exchanges;
- special payment templates for utility bills;
- pending transactions;
- open new deposits;

- close deposits;
- bank account statement file export or send by email possibility;
- cards information menu;
- change card limits, online payment on/off switch, report lost/stolen card, reset card PIN, request card reissue, block card temporarily on/off switch, show card details; enable card biometrics;
- loans information menu;



- Money Magnet: online transfer of money from other banks to OTP BANK ROMANIA accounts, using debit cards issued by other banks in Romania;
- SMS Alerts and Push Notification configuration;
- My Mentor: list of transaction, add new transaction category;
- ATM and branch locator of OTP BANK ROMANIA;
- foreign exchange rates;
- Bank contact;
- received messages from the bank;
- quick access with fingerprint/face ID; • languages: Romanian/English/ Hungarian.

### 3. OTPdirekt – SMS/PUSH Alerts (information only)

OTPdirekt – SMS/PUSH Alerts refers to sending alerts in the form of SMS to the

mobile telephone numbers indicated by the client, according to the contract signed with OTP BANK ROMANIA, or in the form of a PUSH message to the smartphone with the SmartBank application installed.

The alerts received through a SMS/ PUSH notification can be of several types, depending on the client needs:

- account balance: the client is informed about the account balance selected in the contract, at the requested date;
- account control: the client is informed about the activities on the current account (crediting/debiting of the account, regardless of the reason), having full control on his account, in real time;
- card control: sends an alert immediately after the card was used in a transaction (POS/online payments/cash withdrawals) or security inquiry (incorrect PIN/CVC);

- NBR Exchange Rate: this alert will send, daily, the NBR quotations (from Monday to Friday), after 13:00 o'clock (after the official exchange rates are supplied by NBR);
- debit instruments for payment (only for legal entities): the alert will be sent in real time immediately after the information for the instrument is verified in the system. It is useful for the clients to better manage their payment instruments;
- electronic RM: is sent only for legal entities, to be notified concerning: maturity of credit facilities, commissions, loan instalments, loans interests, deposits that reach their maturity. Together with the alert sent on the mobile phone, the customers will also be notified through the alerts received on the Internet Banking interface;
- deposits maturity: this alert sends SMS/ PUSH notification three working days before the deposit maturity, regardless of type

of deposit or its maturity option. The alert contains information regarding the amount of the deposit, the account alias, interest rate, maturity option and maturity date;

- garnishment alert: this alert is available for both individuals, legal entities and private entrepreneur clients and will be sent to client in the same day when the garnishment will be constituted, starting with 08:00 PM. The alert is detailed and offer information about: the amount of garnishment, type of garnishment, no. of file for the garnishment and exchange rate.



#### 4. OTPdirekt – Contact Center (transactions and information)

With OTPdirekt - Contact Center, one phone call is enough to find out any information regarding OTP BANK ROMANIA or to order transactions and operations on your accounts. The bank representatives can be reached free of charge in all networks, by calling 0800.88.22.88. Contact Center can be contacted also from international networks and through local networks at operator's costs, by dialling +4021.308.57.10. The Contact Center can be reached from Monday to Friday, starting from 08:30 until 21:00 (local Romanian time).

Besides general information regarding OTP BANK ROMANIA, through OTPdirekt

Contact Center, customers can find out anything they want about the bank's financial products and services, about the exchange rates, standard commissions, and many others. If a customer already has an OTP Bank account, then he can choose:

- to obtain specific information (private) regarding his financial status (accounts, deposits, credits, taxes, commissions, special offers etc.);
- to perform transactions/operations: opening current accounts, transfers and payments in RON or foreign currencies, exchange, card blocking, opening/ closing deposits, closing/ending/modifying/ suspending an intra-banking direct debit payment.



 **184,095** ↑

The number of OTPdirekt – Internet Banking and Contact Center users, on December 31, 2021, **increased with 28% compared to 2020.**

 **158,360** private individuals

 **25,735** legal entities

 **181,270** ↑

The number of OTPdirekt-SMS Alerts contracts, on December 31, 2021, **increased with 48% compared to 2020.**

 **166,098** private individuals

 **15,172** legal entities

 **22,244,071** ↑

The number of SMSs messages sent to the clients during 2021 **increased with 37% compared to 2020.**

 **164,258** ↓

The number of calls to the Contact Center received in 2021 **decreased with 23% compared to 2020.**

 **2,745,079** ↑

The number of transactions through OTPdirekt&Internet Banking **increased with 32% compared to 2020.**

 **102,480** ↑

clients used the SmartBank application during 2021. Number of clients that used the application **increased with 67% compared to 2020.**

 **EUR 12,019,285,481.28** ↑

The transaction volume through Internet Banking **increased with 16% compared to 2020.**

OTPdirekt.ro availability **99,8%** and OTPBank.ro availability **99,7%**

### 3.4 A new branch, under an innovative concept

OTP Bank Romania inaugurated in february a new branch in the city of Timișoara. The new branch is developed under the regional banking service center concept, which brings together a self service area and personalized customer advice from trained bank specialists.

The new OTP Bank investment is part of the organic development strategy, through which the bank relies on the expansion of the physical network. The center serves all categories of retail customers, including individuals, micro-enterprises, SMEs and Private Banking customers, as well as Corporate customers.

Within the branch, customers may conduct self-banking activities individually, through ATMs and Self Service terminals, while the team of specialists and consultants provides personalized assistance and financial advice. The OTP Bank unit also introduced the Meeter - Greeter concept, through which a bank representative contributes in improving the waiting time of customers for carrying out their operations.

### Convenience feature

It is new development that the queue management systems of the Romanian subsidiary send a warning to branch employees after a waiting time of 5 minutes.

We try to make the time spent in the branch more comfortable or useful even during the waiting time and the administrative processing. While they are waiting, our customers have already had access to our WI-FI network.

Water fountains are available in 90% of the Romanian branches.

### Deposit ATM

Among the most important OTP Bank Romania card related projects in 2021, we mention the launch of the new contract and sales flow for credit cards where we aim for 1 client visit and the reduction of the cost for contract printing with 66%, the launch of the cross-sell flow for credit cards to personal loans and mortgage loans and the launch of the contactless ATM functionality.

In addition to strengthening the advisory function of branches, we are expanding the solutions that support convenient and simple transaction execution; thus we increased the number of depositATMs further within OTP Bank Romania.

In Romania, the number of smart ATMs rose to 97.

### OTP Consulting:

In all Human Capital Operational Program projects that OTP Consulting Romania carries out, the entrepreneurs were encouraged to choose OTP Bank as the relationship bank and to access OTP Bank's electronic products. Moreover, OTP Consulting together with OTP Bank Romania have jointly designed a new product for subsidies from European funds.

### OTP Asset Management

All our products are available to anyone, and the minim required sums start from as little as the equivalent of 10 Euro, a sum we believe is very inclusive, and among the lowest in the banking system asset-management firms.



### 3.5 Improving Financial Literacy

#### GRI 417:103-2,103-3

Improving financial literacy has been the most prominent, most influential corporate social responsibility of OTP Bank Romania for years.

We have fostered the expansion of the population's knowledge with numerous tools as indeed financial knowledge and financial awareness need to be improved.

**OTP Bank Romania aims to contribute to the development of responsible and healthy financial behaviour both among the young generation and among adults, the OTP Bank Romania Foundation being the institution that coordinates and implements the financial education activities of the bank.**

#### Financial education for pupils and students

The target group of the financial education program for pupils and students consists of children and youngsters from all over the country who are between 10 and 19 years old. In addition to financial education courses, our course agenda also includes career guidance courses for pupils and students between the ages of 13 and 19.

OTP Bank Romania continued to play an important role as a traditional promoter of financial education, through the Right to Education Foundation.

Starting with 2019, the PR communication approach of OTP Bank Romania has focused to increase interest and efforts for financial education, including participating at the profile events.

**Other premiere for the Foundation's activity in 2021 was the organization and**

**hosting of the first Erasmus project.** The objective of the project was to identify and test two methods of promoting financial education. The project took place in September, 2021 and brought together 18 participants from six countries.

#### Financial Fitness

The financial education program Financial Fitness has consolidated its important position in the portfolio of educational programs of the The Right to Education Foundation, not only because it is aimed at adults, but especially because it has the role of contributing, concretely, to the acquisition of a responsible financial attitude.

The financial education program for adults, "Fitness Financiar", continued in 2021, with approximately 500 people interested in acquiring responsible financial behaviour that participated in the 49 sessions. The two directions of action are, on one hand, to promote this program among colleagues within the OTP Group, and, on the other hand, to the employees of legal entities working with OTP Bank Romania.



**500**

**participants at Financial Fitness**



# 4. Financial Services Committed to Sustainability





## 4.1 Maximize customer satisfaction with minimum physical interaction

2021 was a special year, still marked by Covid impact all over it. The most important challenge and achievement was to adjust the necessary flows and interactions as to accommodate less physical presence in the territorial units and more remote access of products and services for our customers. Thus, continuously starting with pandemic debut at the beginning of 2020, we adjusted our internal and external flows, as to maximize customer satisfaction in a context of minimum physical interaction.

On lending side, OBR was among the first banks in the market offering own moratoria (grace period) to customers having due instalments during March-May 2020.

Additional legislative and non-legislative moratoria were implemented during the whole year to sustain a good quality of the loan portfolio and meets customers adjusted needs within Covid context.

Adjustments of lending criteria to secure qualitative new production were implemented, as well as adjusted mechanism for on-going loans within Covid context in order to secure customers experience and quality of existing portfolio (adjusted income transfers ITR discounts).

In the new context of Covid, the customer's requests for alternative workflows increased. Thus, in order to perform various operations remotely even without holding Internet



Banking solutions (like: opening deposits, issuing insurances, modifying lending criteria, etc), we adjusted the internal flows in order to offer such solutions for our customers.

## 4.2 Households and residential communities

### Young people

Besides financial education, OTP Bank pays special attention to young people even through its products.

The Junior account is a savings product in the form of a current account with an increased and differentiated interest on tranches, addressing clients of minors or individuals between 18 and 25 years old, with or without residence / citizenship in Romania.

The product offers customers both the possibility of obtaining higher interest levels

compared to those offered for the current account, and the performance of certain types of banking operations based on financial limits established in advance by the legal representative of the account holder, depending on age.

Depending on the age categories, the Junior Account is divided into three types: Junior Start (between 0 and 14 years old), Junior Plus (between 14 and 18 years old) and Junior Max (between 18 and 25 years old).

### Access to real estate, modernisation GRI 203-2

OTP Bank Romania plays an important role in the housing goals of the population primarily through mortgage loans. In addition to our own products, we serve our customers by taking an active part in state- subsidised schemes. We provide predictable loans that are aligned with the debt service capacities of our customers.

### Noua Casa program

As a universal bank, we have the responsibility to provide our customers with a complete range of banking products and services, and the Noua Casa program is an essential one. In a still sensitive economic context, in partnership with National Credit Guarantee Fund for SMEs (FNGCIMM), OTP Bank Romania supports through this program the purchase of new homes by offering optimal lending conditions. The bank grants loans for the purchase of housing offering a variable interest rate of 2% + IRCC (Consumer Credit Reference Index), without analysis or administration fees.

In case of "Noua Casa" state subsidized mortgage loans, OBR used its initially allocated ceiling and got supplemented one to be used, but its weight in the total new ML sales is much lower compared to the previous years.



### 4.3. Micro, small and medium-sized business customers Launch of the Micro Department

#### Launch of the Micro Department

OTP Bank Romania has established its Micro Department, through which it provides dedicated financing and consulting services for small companies, with a turnover of up to one million euros per year.

Through the new specialized direction, OTP Bank aims to support the business environment and liberal professions with banking products and solutions adapted to the specific needs and size of this type of entrepreneurial companies, which usually do not have sufficient own resources to support the proper development of the business, and which are also the most affected in times of economic downturn nation-wide.

The services of the Micro Department for companies with businesses of up to one million euros, which represent the largest share of more than 1 million

active companies in Romania, are available through the OTP Bank branch network, and entrepreneurs are advised by specialized personnel dedicated to building optimal financial packages for development and investment.

#### Opportunities and tools for our SME clients

In 2021, the SME business line (including Micro) recorded an increase with 29% of the total loans volume and with 24% of number of active clients, maintaining at the same time the complex approach of the cross-sell/ up-sell methods.

39% out of the total revenues generated by the transactional activity of the Bank's clients, was generated by the SMEs (including Micro clients), confirming the strategic importance of this segment.

The year 2021 brought unexpected challenges and extraordinary circumstances for the business environment and the entire society, as we faced global pandemics caused by the COVID-19 virus. Therefore, the daily activities and ways of conducting the daily business activities suffered a major impact with many industries severely affected by the consequences of the pandemics.

The Business Division offers comprehensive financial solutions for private individuals, self-employed entrepreneurs, small and medium enterprises (SMEs) and large corporate. Our priority is to offer the most efficient financial solutions available, according to the real needs. Our aim is to convert simple relationships into strong, fruitful partnerships, based on trust. With an

approach defined by responsibility, sustainable performance and commitment to a better understanding of our customers' needs, OTP Bank Romania is a reliable partner in providing best quality financial services for its customers:

- **We continued to be a solid partner of the IMM Invest/AGRO IMM Invest Program**, launched by the Romanian Government on the 17th of April 2020, taking into account the success of the program. We were one of the first banks that granted loans within the IMM Invest Program, since we understood the emergency and the necessity of standing by the Romanian entrepreneurs in this ambitious Program. Since its inception, we have intensely promoted the IMM Invest program among our clients because we understood the benefits it brings to the business environment and, most importantly, we have reconfigured our internal structure and increased our team so that we are able to support the SME's segment as efficiently as possible through specific solutions. The IMM Invest/AGRO IMM Invest Program is a viable solution for companies that are facing a temporary lack of liquidity or that need to adapt their business plans to the particular evolution of the business environment. Approximately 25% of new loans sales in 2021 are granted within the Invest/AGRO IMM INVEST program.
- In June 2021, **OTP Bank Romania become a partner bank by concluding the Convention with the Ministry of Economy, Entrepreneurship and Tourism, for the support measures instituted by the Government Emergency Ordinance no. 224/2020**

**regarding the grants for the HoReCa companies, respectively in the fields of tourism, public food service and event organization, whose activity was affected in the context of the COVID-19 pandemic, within the context of the crisis caused by COVID-19.** Therefore, we have opened dedicated accounts (with zero commissions for receipts / payments in RON for inter / intrabank transactions, except for commissions with third parties (ex: Transfond; NBR), for the amounts in the grant accounts) and distributed the funds for the eligible companies and private entrepreneurs according to the conditions of the program.

- Considering the success of last year's Black Friday campaign and in order to promote the transactions through the digital services and the brand awareness, we developed a very successful "Zero Friday" campaign in November 2021. All the clients that registered exclusively in the dedicated online landing page and met the criteria of the campaign could benefit of: the free of charge current accounts at the bank, Internet Banking for one user and Visa Business debit card, unlimited number of inter-banking payments in lei by Internet Banking and optionally, one 1 POS / E-Commerce / Soft POS terminal, for which a commission of only 0.70% commission is applied to the processing of transactions through POS / E-Commerce / Soft POS regardless of turnover.
- In order to sustain the business environment and mainly the businesses affected by the pandemics, we have implemented the solutions as per the Government Emergency Order

no. 37/2020, with all the subsequent amendments. Customers with ongoing loans, whose income was directly or indirectly affected by the situation generated by the COVID-19 pandemic, had the possibility to request rates deferral for a period between 1 and 9 months, in accordance with Government Emergency Ordinance no. 227/2020 for the amendment and completion of GEO 37/2020 on the granting of facilities for loans granted by non-banking financial institutions to certain categories of debtors. The measure was also addressed to customers who did not request this deferral until June 15, 2020, according to the law, for loans granted until March 30, 2020.

- In addition, OTP Bank has concluded a Collaboration Agreement with the Agency for Financing Rural Investments, in order to support the acceleration for accessing European funds allocated through the European Fund for Agriculture and Rural Development (FEADR) in the Transition period 2021- 2022. Based on this partnership, we identify solutions for accessing European funds, by identifying the co-financing needs and also a better implementation of the investment projects of the beneficiaries. The advantages of the partnership concluded with AFIR are:
  - offering financing solutions: Co- financing of the eligible project's eligible expenses, through an investment loan; Financing of the non-eligible expenses of the eligible project (other than VAT), through an investment loan; Pre- financing of the non-reimbursable funds related to the eligible project through a bridge loan until the beneficiary cashes- in the grant;

- free verification of the eligibility of the applicants and the viability of the proposed investment project. The OTP Consulting representatives will analyse, free of charge, the eligibility of the beneficiaries and the business idea, by offering proper counselling in order to increase the chances of obtaining a non-reimbursable financing;
- Offering a discount for the OBR clients regarding the consulting services for the elaboration and the submission of the financing request and professional assistance until the end of the project monitoring.

In the same direction of increasing digitalization, in November 2021 OBR launched (silent launch phase for the moment) a digital platform for 100% online Micro & SME onboarding - covering 10 packages & Black Friday offer.

Thus, in a fully online process, companies registered in the Romanian Trade Registry & having a unique shareholder, can perform KYC to become OBR clients and open current accounts (in RON, EUR & HUF), business card, Internet Banking & POS (physical or softPOS or e-commerce).





### GRI 203-2 Double SAPS

At the same time, in 2021, besides the specific projects of the SME and Micro client category and measures taken to support the businesses through the difficult economic and social period, we continued to place the agriculture at the center of the OTP Bank Romania preoccupations.

The loan for double pre-financing of the APIA SAPS subsidies is still unique on the banking market and represented a real support for the Agri businesses, by its specific characteristics of pre-financing subsidies for two years. The volume of loans granted for prefinancing SAPS subsidies has increased with 30% in 2021 compared to 2020.

## 4.4 Large Corporate projects

**As a reliable partner, Large Corporate is constantly concerned with supporting the activity of its customers by developing new products and services or customised financing solutions that fully meet their current needs and those of business grow.**

In this respect we launched in 2021, a new product "Cash loan for stock financing of agricultural equipment and vehicle", in order to support the dealers and distributors to increase the sales of financing agricultural equipment, involving also leasing companies.

Given the context of the economic crisis generated by the COVID-19 pandemic,

most companies are directly or indirectly affected by the severe lack of liquidity. In this respect we extended the relationship with EXIMBANK in order to grant loans secured with state guarantees issued by EXIMBANK, to those clients affected by the pandemic, that confront with lack of liquidity and collaterals.

### OTP Consulting

- Successful implementation of the 3 projects financed by the EU funds, budget 10 million Eur, launched in partnership with the Romanian Chamber of Commerce
- FIA project „Become Entrepreneur at Home! Invest in your future!"
- The Sustainable Entrepreneurship Project in the Center Region
- SMART START UP
- **New EU financed project 2021**
- The AID4NEETs project, selected for financing with a score of 99 points, will be carried out in partnership with the County Agency for Employment Bacau and AJOFM Covasna.
- The project aims to support young NEETs, from the North-East and Central regions, for a period of 24 months and has a total budget of 3.5 million Eur
- "Innovative Entrepreneurship for Students - AIS" The project has a duration of 30 months and aims to encourage entrepreneurship among students and generate 20 businesses in the 7 least developed regions of Romania, and has a total budget of 2 million Eur
- „SIA - Innovative Students, Future Entrepreneurs ". The project has a duration of 30 months and aims to encourage entrepreneurship among students and generate 20 businesses in the 7 least developed regions of Romania, and has a total budget of 2 million Eur.

### OTP Asset Management:

In 2021 we simplified along with our distributor, OTP Bank Romania, the investment funds distribution procedure, eliminating the requirement for investors to make the first subscription at a OTP Bank Romania branch and also . Now, the client can sign the financial instruments distribution contract in a branch and subscribe/redeem investment fund units directly in OTPdirek, thus reducing electricity and paper consumption.

We also incorporated durability risks in our risk management process for all our funds, initiated a durability risk evaluation of all our investment funds, and initiated the launch of OTP Innovation, article 8 ESG light-green fund, due in 2022.

## 4.5 Agro Sector Customers

Agri-business sector is a strategic one for our Bank, sector that also was faced with important challenges as:

- Supply chain disruptions;
- Slowdowns in raw material procurement;
- Borrowing cost has increased;
- Transport restrictions and quarantine measures limited farmer's access to markets;
- Some food commodity prices are increasing;
- Less available hard collateral.

That is why we are also continuous acting for:

- improving the conventions signed with the Guarantee Fund for Rural Credit in order to sustain the access of all agri-business clients to loans secured with guarantees instruments issued by this fund;
- improving the existing conventions and

signing new conventions with the Agency for Intervention and Payment in Agriculture for collection the EU subsidies of all agri clients of the Bank and prefinancing of these.

Nevertheless, several important new financings were granted to important players on the market, in order to support their investment strategy and current working capital needs:

- Syndicated loan for an important group in Agro sector (15 mio. EUR)
- Co-financing a project with EU funds for another important player in Agro sector from Moldova (processing and distribution of poultry meat), 28 MRON

## 4.6 Portfolio components by sector

The environmental and social risks of economic activities are defined for Level 4 NACE codes. All activities are high-risk within the Mining and Quarrying sector group. In the case of the activities involved in Real Estate Activities, Administrative and Support Services, Human Health and Social Work Activities and Other Services, the highest consolidated environmental and social risk rating is medium. Professional, Scientific and Technical activities are low-risk activities. The risk rating of activities in the rest of the sector groups ranges from low to high.

Exposure calculations are not based on Schedule RC-C and Schedule RC-I, and the classification is not in line with the NAICS classification.

### GRI 102-6, FS6, FN-CB-410a.1<sup>4</sup>

Micro and small enterprises	Assets by sector, on-balance sheet exposure to own customers without leasing and consolidation, 31/12/2021 <sup>4</sup>
Agriculture, forestry, fishing	6%
Mining and quarrying	0%
Manufacturing	12%
Electricity, gas, steam and air conditioning supply	0%
Water supply; sewerage, waste management and remediation activities	0%
Construction	12%
Wholesale and retail trade; repair of motor vehicles and motorcycles	30%
Transportation and storage	10%
Accommodation and food service activities	5%
Information, communication	2%
Financial and insurance activities	1%
Real estate activities	2%
Professional, scientific and technical activities	8%
Administrative and support service activities	4%
Education	1%
Human health and social work activities	4%
Arts, entertainment and recreation	0%
Other services	1%
Activities of households as employers; undifferentiated goods for own use	0%
Not classified	1%

<sup>4</sup>The table contains the data of only those sectors whose share is above 0.5%. Because of that and because of rounding, not all columns add up to 100%. We do not identify potentially significant environmental and social impacts by sector. Industrial classification is according to UN (ISIC) classification. Company sizing complied with the available legal categorisation.

Medium and large enterprises	Assets by sector, on-balance sheet exposure to own customers without leasing and consolidation, 31/12/2021 <sup>4</sup>
Agriculture, forestry, fishing	15%
Mining and quarrying	0%
Manufacturing	14%
Electricity, gas, steam and air conditioning supply	3%
Water supply; sewerage, waste management and remediation activities	1%
Construction	13%
Wholesale and retail trade; repair of motor vehicles and motorcycles	18%
Transportation and storage	4%
Accommodation and food service activities	4%
Information, communication	1%
Financial and insurance activities	6%
Real estate activities	13%
Professional, scientific and technical activities	4%
Administrative and support service activities	2%
Education	0%
Human health and social work activities	1%
Arts, entertainment and recreation	0%
Other services	0%
Activities of households as employers; undifferentiated goods for own use	0%
Public administration and defence; compulsory social security	1%
Not classified	0%

## 4.7 ESG factors integration in credit risk

### Environmental, Social and Governance risks (ESG)

OTP Bank Romania's mid term objective is to develop a comprehensive ESG risk management framework able to ensure alignment with the definitions and requirements of EBA and ECB, local integration the parent bank's strategy for green financing and ESG risk management and increasing understanding and capability to quantify ESG risks in order to set limits (at the level of business line, economic sector or product) that adequately reflect the appetite for ESG risks.

The bank's corporate lending policy regulates the sectoral concentration limits and provides guidance for our lending activities to different economic sectors.

In 2021, the bank implement a new methodology primarily for the assessment of environmental risks at initiation of exposures to corporate clients and over the life of the exposure. Economic activities whose nature and impact are incompatible with the values set at the level of the OTP Group in terms of providing responsible financial services and promoting sustainable development will be excluded from financing on the basis of a defined list.

Also in 2021, based on the Green Program Directorate's guidance from OTPH Group, initiated the process for the development and implementation of the Bank's ESG Risk Management Strategy.

### Management ESG Risks

In the corporate business line we introduced the Lending and monitoring ESG risk management framework in relation to banking and leasing risk acceptance, and commenced its group level rollout.

During the lending activity, the purpose of ESG risk management is to identify and mitigate the risks arising from environmental, social and governance factors.

The process of ESG credit risk assessment consists of screening based on the exclusion list, and the ESG risk classification of customers and then transactions. The detailed rules of the process were laid down in internal regulatory documents.



# 5. Ethical Business Behaviour and Security



## Commitment

Strengthening confidence in the reliability and integrity of the banking system, ethical and safe operation.

## Approach

We fulfil our role as financial intermediary in a way that ensures that the money and data of our customers are safe and secure throughout; we take care not to contribute to objectives breaching the law or the values upheld in society.

## Activity

- Full compliance with laws and regulations
- A consumer protection activity focusing on preventing the violation of customer interests
- Strict, conservative risk management
- Reliable, continually improving security systems, protection

**GRI 205, 206, 307, 406, 410, 417, 418, 419 DMA**

**We are convinced that compliant and ethical operations and transparency are important values; they help improve our competitiveness, preserve our reputation and increase our recognition both.**

**We consider security fundamental both for the OTP Bank Romania's stability and for the protection of our customers. The coronavirus pandemic further underpinned the importance of IT and cybersecurity.**

## 5.1 Compliance Function

**The Compliance Directorate's objective** is to ensure the Bank's compliance with legal and regulatory framework, standards of professional ethics and conduct, as well as to develop a compliance culture within the institution.

### Reorganization of the Compliance Directorate

**Compliance fundamental principles** as well as the main direction of activity within compliance area are highlighted within **Compliance Policy of OTP Bank Romania S.A.** and the **Compliance Strategy**. **These principles** aim to establish, facilitate and support the Bank's proper, legal, safe and prudent operation, through strategic objectives based on industry best practices.

Based on the Compliance Policy, including personal data protection aspects, the Bank has developed regulations and established the necessary tools for policy implementation, considering the Bank's activity and size complexity, as well as the applicable national, European and international regulations, aligned with OTP Bank Nyrty's own policy.

Regarding personal data protection, it is specifically stipulated that the non-observance of **Personal Data Privacy Policy** may affect the subjects' rights, as well as lead to significant financial and reputational losses for OTP Bank Romania S.A. and to possible disciplinary consequences for responsible Bank employees.



### GRI 418 DMA Data protection

In compliance with statutory requirements, the protection of the confidential data of customers and of the OTP Bank is a priority for us. The bank applies the most modern solutions continuously for data processing and data security and in order to prevent data leaks.

At OTP Bank Romania, dedicated data protection officers and data owners are responsible for ensuring compliance with the data protection requirements (e.g. supervising personal data processing, principle of data minimisation, the processing of high-risk data).

### GRI 102-16, 205 DMA, 205-2, 406 DMA, 406-1, 415 DMA, FN-CB-510A.2

#### Code of Ethics

The Code of Ethics of OTP Bank Romania S.A. contains provisions related to the fight against corruption and the practice of bribery; the Code is posted on the Bank's website. The Bank management have adopted the principle of zero tolerance towards corruption and bribery, taking a definite stance against all forms of corruption and giving full support to the fight against corruption, part of the Code of Ethics - also published on the Bank website. Also, the Bank sales representatives adhere, by signing a specific statement, to the OTP Bank Romania Code of Ethics.





In addition, the bank's agreements concluded with agents contain a specific provision on proceedings in case of violation of the Code of Ethics values/ provisions. Since 2020 the Bank adopted Anti-Corruption Policy (also posted on Bank's website) as part of Compliance Policy and their provisions are applied in conjunction with the provisions of the Bank's Code of Ethics.

All the bank's employees and Board Members signed a statement on the Code of Ethics acceptance. All the Bank's customers are informed about the Bank's values and principles included within the Code of Ethics by publishing it on the Bank's website.

### Improvements to complaints management

In order to prevent complaints, we assign great significance to training our employees.

A new flow has been created for correction and reversal of commissions. This helps to be more efficient and solve immediately customers requests regarding the commissions. Also, we had a business analyst that helped us to improve our process for handling and solve the complaints. This led to decrease the number of complaints with 48% compared with 2020, the answer time and increase the customer satisfaction.

Customer complaints	Year ended December 31, 2020	Year ended December 31, 2021	Percentage
Number of justified complaints	537	257	48%

### Prevention of conflicts of interests

To prevent **conflicts of interests**, the Bank has implemented mechanisms for early identification, monitoring and management of situations that may trigger potential conflicts of interests, analyzing the areas with such risk potential - personal recruitment, family relationships, participation in companies, involvement in associations/federations/ foundations, involvement as suppliers or intermediaries, additional legal employment relationships, political positions etc. - as well as through procedures that lead to information flow barriers and responsibility segregation for the employees.

Considering the investment services provided by the Bank, the Policy on conflict in the activity of investment services was developed in 2020. This includes special provisions regarding the identification and management of situations that may lead to conflicts of interest regarding the investment services provided by the bank, particularly the role of ensuring that the clients' interests in providing these services are not affected by employees' interests, the Bank or third parties. The policy also considers conflicts of interest that may constitute market abuse, prohibitions on insider dealing, insider dealing, unauthorized disclosure of insider trading and market manipulation.

OTP Bank Romania S.A. developed and implemented mechanisms and systems to contribute to the compliance with legal provisions and internal regulations incidental to the field of **combating money laundering and terrorist**

**financing** and to ensure a KYC process adapted to the business model, that allows the identification of customers associated risks and the appropriate KYC measures.

- to ensure an effective know-your-customer process, the Bank implemented the risk-based approach, applying customer due diligence correlated with the ML/FT risk associated to customers, both in terms of their characteristics and in terms of purchased products and services.
- In this respect, the bank displays enhanced due diligence towards the categories of customers with higher degree of risk from a ML/FT risk perspective, categories identified according to the risk factors defined within the internal regulatory framework.

In order to comply with specific legislation and applicable regulations in the AML/CFT field and that of international sanctions, OTP Bank Romania S.A. implemented procedures adapted to the business model adopted by the Bank, correlated with the risk strategy and the business strategy, approved by the Bank's management, and intended to be a real support for ML/FT risk management.

- All Bank staff is involved in the process of preventing and combating money laundering, according to the approved authority limits and as per the attributions established within the Bank's Internal Organizational Rules.

Thus, the responsibilities regarding customer due diligence and ML/FT risk assessment associated to customers, transactions and the entire activity **reside**

**with all bank staff**, as per the established limits, structured according to the three lines of defense principles.

• In this respect, Compliance Directorate provides advice to both territorial units and Head Office entities, in order to identify the ML/FT risk elements, and with respect to the observance of international sanctioning regimes imposed, all with the purpose of:

- unitary implementation of provisions applicable in the field;
- limiting reputational and/or financial impact generated by compliance/reputational/operational risks to which the Bank may be exposed.
- with regard to personnel recruitment strategy, at OTP Bank Romania S.A., specific standards within the internal regulations are set for hiring staff with responsibilities in the KYC/AML/CFT area, standards that ensure an adequate selection process versus specific requirements related to compliance function.

**The observance of sanctioning regimes imposed** at international level is a permanent concern for the Bank, considering the global political and economic context, while compliance with trade embargoes and economic sanctions is also a priority.

Aspects regarding international sanctions are important as they may increase the level of risk associated with Bank activity in relationship to customers.

At OTP Bank Romania S.A. level, enforcing commercial embargoes and economic sanctions represents a priority.

For this purpose, policies, norms, procedures and workflows regulating the activity and specific attributions of the employees are issued and implemented, as the activity is supported by the implemented IT solutions.

By using them, the bank ensures continuous updating of information regarding the persons and entities upon which international sanctions

have been imposed at international level - periodical adequate checks are performed to ensure compliance with such latest sanctions.

The Compliance Directorate elaborates, according to the personnel training strategy, approved by the bank's management, training programs for ensuring the training of persons with responsibilities in the application of the measures set out within the KYC norms, so as to ensure that they know the legal requirements, the mandatory responsibilities according to the KYC

internal norms, the risks to which the institution is exposed according to its own risk assessment.

Such programs aim to raise awareness of the consequences of employees' nonfulfillment of the responsibilities and their implications for the institution and the persons concerned, in the case of risk manifesting, and that they have the capacity to recognize suspicious indicators to operations, that may be related to money laundering or terrorist financing.



## 5.2. Cyber security

In order to strengthen its security posture in the face of increasingly sophisticated adversaries, OTP Bank Romania conducted a red team engagement.

Dubbed „NinjaCat“, the exercise emulated how well motivated and highly skilled threat actors could compromise the bank’s information assets, while the bank’s IT Security Department mitigated the threat in real time and without any prior warning of attack.

The attackers benefited from insider assistance and proceeded from an „assumed breach“ starting point where they were given partial access in the bank’s network by assuming an insider threat scenario. The Red Team goal was to act like the adversary, to discover ways to break into the bank and subsequently report on their actions so that the bank may strengthen its defences. Unlike a penetration test, a red team exercise considers the target’s entire IT ecosystem and uses multiple attack vectors in a manner similar to an advanced persistent threat (APT).

### The parties involved:

- A white team charged with coordinating the exercise, mitigating all associated risks and acting as a liaison between the bank and the red team. The white team also included 2 insiders, both OTP Bank employees, with different levels of access to the bank’s network.
- A red team, the external party contracted to perform targeted attacks on the bank’s information assets following a set of mutually agreed rules of engagement.

- A blue team, the IT Security Department’s Incident Responders tasked with mitigating the attack.

### The engagement profile

The red team attempted to fulfil a range of objectives including data exfiltration, code execution on the bank’s systems, user compromise via phishing techniques, and meaningful interaction with the bank’s test payment systems, all within a time span of 3 weeks.

All the objectives fell within the agreed scope and could be fulfilled by any means at the attacker’s disposal.

The result of the engagement was that the Blue Team has managed to discover the Red Team actions and they managed to stop de attacks from producing major damage.

### Insider Threat

Following an „assumed breach“ scenario, the red team used two insiders in order to facilitate malicious payload execution. The

insiders were in direct communication with the attackers and followed their instructions. Their existence or identities were unknown to the defenders.

The red team also sent several emails with malicious content over a period of one hour to high value targets, whose identities were provided by the bank’s liaising team.

### Social Engineering: Phishing campaign & Rogue USBs

Due to pandemic related constraints, the White Team helped creating rogue USBs as instructed by the red team, in order to gain an alternative access to workstations as an initial point of entry. The Red Team created a malicious payload, which would run from a USB stick. The USB sticks were then distributed stealthily throughout the organization in order to test the users’ behaviour upon discovery.

### Malware Deployment

The attackers used a technique called “domain fronting” and used content distribution networks (CDNs) to hide their real attack

infrastructure. This was difficult to detect because CDNs are also used for legitimate purposes.

Both higher-sophistication „evasive“ infection mechanisms and lower- sophistication „direct execution“ ones were tested during the exercise to carry out a wide variety of activities, including host, network or domain reconnaissance, credentials collection and persistence.

The attackers attempted to pair these mechanisms with covert techniques to connect with their command and control infrastructure. The goal was to maintain communication with compromised devices following initial exploitation.

### Incident Response

The Blue Team employed the security solutions at their disposal to full effect and as a result, the attackers failed to fulfil their objectives: no meaningful access and persistence, interaction with systems, communications with the C2 infrastructure nor malware deployment were achieved. Continuous security awareness training resulted in the reporting of 97% of all phishing emails sent during the campaign by the bank’s employees.

The principal takeaway was that, under „NinjaCat“, the bank’s IT Security Department observed and responded to an APT-like threat at large within its IT ecosystem. By witnessing the attackers’ tactics, techniques and procedures as they happened, and by implementing post-exercise recommendation sets provided by the red team, the incident responders were able to consolidate security controls and adapt playbooks to real-world threats.



# 6. Responsible Employer



### Commitment

Employment that provides a great employee experience and a decent and fair standard of living, fostering the well-being and growth of the individual

### Approach

We believe that our employees are our greatest assets; therefore, it is natural for us to strive for ethical employment and equal opportunities. We wish to be an attractive workplace for our talented and committed employees.

### Activity

- Fair employment and working conditions
- Equal access to growth opportunities and rewards
- Opportunities for growth and experience for the employees of the future
- An inspiring and attractive workplace atmosphere, where a work/life balance is feasible

GRI 405 DMA, 405-1, 205-2

### Extensive recruitment program

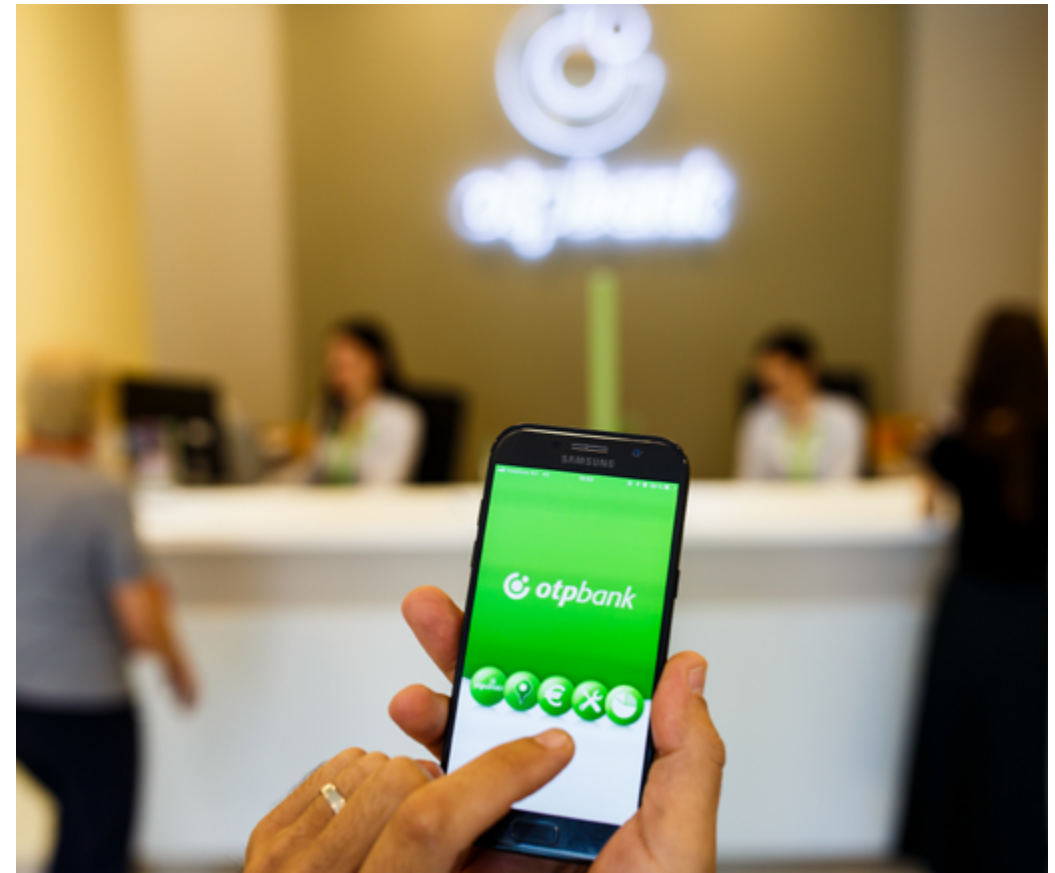
OTP Bank Romania is now part of a process of accelerated organic growth, which includes an extensive recruitment program, focused on increasing the sales force. Last year alone we hired about 200 new colleagues and we are looking to continue hiring. We reached and implemented most of the points in our development strategy, which we will continue to do in 2022.

Overall approach was a client centricity / making things happen even in difficult times, being able to service complex requirements from home, mostly through on-line meetings, face-to-face meetings implemented gradually, function of the evolution of the pandemic and state alert situation, with close collaboration between sales force, branch network, support departments, treasury team, local subsidiaries of the group, all concentrated in fulfilling a great work in channeling with the market needs and demand outflows in terms of liquidity.

### Staffing

The headcount of OBR increased, compared to the previous years.

### Total employees



**Employee statistics**  
GRI 102-8

<b>Employment (2021, OTP Bank)</b>	<b>Average employee headcount</b>	<b>Male</b>	<b>Female</b>
Full time employees	1.789	557	1232
Total part-time headcount	72	25	47
Total headcount	1.861	582	1279

**Workforce breakdown by position (2020, OTP Bank Romania) (active employees, persons, 31.12)**

<b>Categories by position</b>	<b>Age group</b>			<b>Gender</b>		<b>Total</b>	<b>of these disabled employees</b>	<b>of these local</b>
	<b>under 30</b>	<b>30-49 yrs</b>	<b>above 50 yrs</b>	<b>Male</b>	<b>Female</b>			
Senior management (person) CEO & Deputy CEOs	0	2	3	3	2	5	0	3
Middle management (person)	0	37	4	20	21	41	0	
Subordinates (person)	351	1.279	185	559	1.256	1.815	1	
	<b>Persons</b>							
Head offices (person)	1.217							
Network (person)	644							
Number of trainees within the year (persons)	70							



**GRI 405 DMA, 405-1, 205-2  
Extensive recruitment program**

OTP Bank Romania is now part of a process of accelerated organic growth, which includes an extensive recruitment program, focused on increasing the sales force.

Last year alone we hired about 200 new colleagues and we are looking to continue hiring. We reached and implemented most of the points in our development strategy, which we will continue to do in 2022.

Overall approach was a client centricity/ making things happen even in difficult times, being able to service complex requirements from home, mostly through

on-line meetings, face-to-face meetings implemented gradually, function of the evolution of the pandemic and state alert situation, with close collaboration between sales force, branch network, support departments, treasury team, local subsidiaries of the group, all concentrated in fulfilling a great work in channeling with the market needs and demand outflows in terms of liquidity.

**Programs for the employee adjustment and well-being in the era of COVID-19**

We have implemented several programs which targeted the entire organization and which focused on better handling the situation generated by COVID Pandemic.

Here is a detailed overview of the initiatives:

**Leaders Offering Support**, a program dedicated to managers and directors in front office. The program consisted of two workshops, Building Emotional Resilience and Leaders Offering Support as well as individual coaching sessions for those in need.

**Leading Teams in Challenging Times**, a program dedicated to managers and directors in head office. The program consisted of two workshops, Building Emotional Resilience and Leading Teams in Challenging Times as well as individual coaching sessions for those in need.

**Individual psychotherapy sessions** for all those who needed and also a series of workshops held by a psychotherapist. The main topics addressed were: relationship management with and between children, in the work from home situation, couple relationship in the work from home situation, burnout and the need for control, fears associated with the current context and anxiety and depression - reactions of the current context.

**Wellbeing while working from home**, a series of workshops dedicated to physical health. During the workshops, the trainer shared simple tips that our colleagues were able to put into practice during the pandemic. They also benefited from advice on healthy eating, as well as myths and realities about the current pandemic situation.

**Self-management while working from home** - these interactive workshops helped our colleagues to develop and acquire skills to manage the current situation, to be as flexible and productive as possible even from home.

**Decision Making, Stress and Recovery in Times of Crisis** - this program is aimed at all those who wanted to better understand and manage how they think, feel and react in times of stress and crisis, but also how they can help others. The workshops shared the latest findings in neuroscience and psychology in a practical and up-to-date presentation, as well as tips on how to best manage ourselves and our emotions during this global pandemic.

## Work-life balance

As regards work-life balance, without a doubt, the greatest step of 2021 was to establish the conditions for home office and signed additional deed with telework clauses for our colleagues. We also had part-time contracts. As anti-Covid-19 measures, we used flexible working hours, being an important solution regarding the limitation of social contacts and to avoid the use of public transport during peak hours. At the same time, in order to increase the degree of protection of colleagues in the territorial units and to limit the social contact, a temporary work system was introduced by weekly rotation in some units, agreed at the level of each team together with the direct managers, without affecting the employees' rights or salaries.

The measure had to be implemented extremely fast, but it not only ensured business continuity and safe work performance, but also allowed for the completion of household duties.

Even as the coronavirus pandemic eases, we would like to keep open the option of home office work at all member companies, ensuring the optimal balance between home office and office work.

## Diversity Action Plan

Through our employment policy we encourage diversity and equal payment for all our staff. We also try to have a balance between males and females in our company. The senior management approved an action plan to support the implementation of the equal opportunity for men and women principle. The plan includes numerous measures; for example, dedicated equal opportunity training, workshops, educational and

awareness raising events for the prevention and handling of discrimination and abuse (including mobbing, humiliation, sexual abuse). The statutory requirements were also integrated into all relevant internal regulations and policies (e.g. remuneration policy, collective bargaining agreement, recruitment and selection policy).

## Equal Opportunities

### HR OBR:

The OBR employees' complaints regarding harassment and discrimination at work place were investigated and solved by the Bank. The plaintiff employees received a written reply from the Bank. The employees found guilty of harassment were fired by the employer following a preliminary disciplinary investigation. The complaints and the settlement measures were quarterly reported in Management Board.

The following OBR Internal regulations in which legal provisions regarding equal

opportunities between women and men are integrated were revised during 2021:

- Internal norm regarding the prevention and combating discrimination and harassment at the workplace and removing any form of dignity violation
- Collective labor contract 2021-2023
- Remuneration policy OTP Bank Romania S.A.
- Recruitment and selection policy OTP Bank Romania S.A.
- The procedure regarding the appointment of the persons holding key positions within OTP Bank Romania S.A.
- Procedure regarding the training and development of the staff within OTP Bank Romania S.A.
- Performance Measurement and Appraisal Policy-Otp Bank Romania S.A

### OTP Consulting

- Within POCU projects managed by OTP Consulting Romania, effective actions have

been planned on equal opportunities, support for vulnerable groups, such as:

- "AID4NEETS" project:
- out of 1,051 participants, minimum 40% will be women.
- out of 30 supported entrepreneurs, minimum 5 entrepreneurs will be women.
- out of 1,051 participants, 221 will be selected from rural areas and 112 will be Roma ethnicity.
- out of 1,051 people in the target group, 316 people are young NEETs with a very difficult profile (they have not completed their compulsory education, they have medical problems / single-parent families, they have not worked at all).
- equal pay level for project experts with the same position.
- key positions (coordinators) held by at least 1 woman.
- the information and awareness campaign comprise examples, case studies, relevant messages on equal opportunities and gender and how to combat discrimination in the workplace, in social life, in the private area.





### Employee Engagement Survey

Annually, we rollout the Employee Engagement Survey, addressing main issue at organization level, helping us in developing key initiatives to answer the pain points identified.

Also, we have developed several internal surveys on key topics we needs employees feedback – onboarding program, compliance area, performance management new platform, improving customer journey process.

Wow Moments Contest was a key initiative to involve employees into the improvement of customers experience. Over 49 ideas were registered into the contest.

Voice of the Employee: New Hire Satisfaction

Survey, Buddy research, Hiring managers satisfaction (on boarding), Internal Comm Survey, No Meetings Day Survey and focus groups, Compliance Culture Survey. Several one to one interviews and one internal survey were rollout with colleagues within Head Office in order to create a tailored plan for career path program.

Several one to one interviews and one internal survey were rollout with colleagues within Head Office in order to create a tailored plan for career path program.

### Employee satisfaction measurement

#### GRI 102-43, 102-44, 401 DMA, 402 DMA

OTP Bank Romania`s employees showed the highest rate of satisfaction with workplace safety (85%). They were also

highly satisfied with the communication with management. According to them, remuneration and recognition need improvement primarily. The bank introduced also a satisfaction survey for new hires, and in relation to the entry process.

The result of the measurement was communicated to all employees through our internal communication channels and our managers. The action planning phase built on a mutual dialogue between the teams. Action plans were prepared and approved by the Management Committee for all areas that needed improvement.

The annual survey provides the means for following up on and finetuning the impacts of the developments implemented and for trend-monitoring the results.

### Carrer opportunities

In 2021, OTP Bank Romania developed and introduced its OTP Career Path Strategy for employees working in the network sales area, in which it defined general career opportunities, designed career development plans, and drew up professional and communication materials for employees and managers supporting the process.

### Remuneration of employees

OTP Bank's gender-neutral remuneration policy declares that job-specific wage brackets are aligned with the level of positions and market practices in its wage setting strategy; our performance review system is based on objective indicators and/or specific goals.



### GRI 405-2

#### Ratio of the basic salary of women to men, 31/12/2021

	Men		Women		
		Senior managers	Middle managers	Employees	Average
OTP Bank Romania	100%	95.8%	87.3%	93,3%	93,2%

## Training and education

### GRI 404:103-2,103-3,404-2

For the efficiency of training, we improved new training forms in accordance with the topics and the preferences of training participants. One of the priorities of our HR Strategy is to support and develop managers who play a pivotal role in a team's success, in holding together and motivating the team or, in adjusting to hybrid operation.

At our level, we allocated 5.395.000 RON for the education of employees. We switched to digital operation in education due to the pandemic and, based on the positive experiences, only a part of the training will return to a classroom setting

even after the pandemic. Indeed, digital training proved to be extremely successful in numerous cases. Participation in the professional and other training courses necessary for work performance (e.g. ethics, compliance, security, health and safety, environmental protection) and in personal and professional development training courses is also based on the annual training plans.

All of our employees receive training. Training plans are developed with the involvement of staff, taking into account the results of performance reviews. Professional training for employees and the up-to-date knowledge of our branch employees is a priority in addition, training courses are also provided to support personal skills and growth.



### GRI 404: 103-2,103-3,404-1

#### Annual trainings, hours of trainings

##### by categories

Senior managers (CEO & Deputy CEOs)

445

Middle managers

12.942

Subordinates

29.694

##### Total hours of trainings by categories

43.081

Male

13.103

Female

29.978

##### Total hours of trainings by gender

43.081

##### Training cost

5.395.000 RON

## Health, working environment

### Work-life balance

OTP Bank Romania continued its 'Let's Work Smart' programme, which was supplemented with new hints and advice for efficient work performance and the organisation of daily work schedules and meetings. Friday is still considered a NoMeetingDay, dedicated to the personal tasks, creative work and development of employees.

#### GRI-401-3

Employees taking parental leave and employees returning, 31.12.2021	Men	Women
Number of employees taking parental leave	2	76
Number of employees returning to the company from parental leave	3	33

#### GRI 403 DMA, 403-6

We provide our employees with healthcare services over and above what is required by law, including health insurance. In addition, we expanded the scope of the services available under the health insurance policy (e.g. teledoctor consultation).

### Employee data

#### GRI 401-1



### New employee hires and employee turnover, 2021

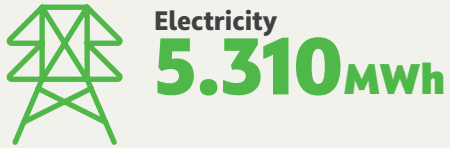
Employees by age and gender	Age group			Gender		Total
	under 30	30-49 yrs	above 50 yrs	Men	Women	
Employees leaving (persons)	111	266	33	132	278	410
New employees (persons)	117	278	21	124	352	476
Employees according to organisational structure	Head Office	Network			Total	
Employees leaving (persons)	242	168			410	
New employees (persons)	286	190			476	

# 7. Environmental Protection



**Energy**  
**GRI 302 DMA, 302-1**

OTP Bank Romania's energy consumption is decreasing from year to year to, due to new equipment used in branches and reduction of heating through HVAC. Our branches have now modern equipment with high quality and efficiency, new HVAC installed in branches uses ecological refrigerants with a minor impact on the environment. We are also using LED lighting in our new branches to reduce electrical consumption and we will adapt all the other spaces of OTP to LED lighting to improve our impact over the environment.



**Travel**  
**GRI 302 DMA, 305 DMA**

The number of business trips and the size of the vehicle fleet are determined by the needs of the business. Travel rationalisation and the use of videoconferencing is common practice. Bank-level total mileage decreased in 2021, mainly because of the Covid-19 pandemic. As part of the efforts expended against the pandemic, we provided support for the use of personal vehicles to and from the workplace.

**Travelling by air**

Operating and managing the bank necessarily requires air travel as well. Due to the coronavirus pandemic, the volume of such travel declined significantly year-on-year. At OTP Bank Romania, there were 342 internal and external business flights, compared to 188 in 2020.



**342**

**Number of flights:**

**Video conferencing**

We use more and more conferencing devices and equipment; moreover, communication via applications without any specific device has become a daily practice, which we did not measure. Due to the pandemic, video conference calls from office buildings increased.

**Paper**

OTP Bank has been striving for years to reduce its paper use and increase the use of recycled paper. The pandemic obviously reinforced digitalisation, and working from home also reduced the volume of printing. At the same time, statutory requirements still demand paper-based administration in many cases.

**Waste collection**

Waste collection remained unchanged in most respects in 2021. We collect and manage hazardous waste and paper containing business secrets selectively, in compliance with the relevant legal requirements. OTP Bank Romania collects all paper, metal, glass and plastic selectively.



# 8. Local Community



## GRI 413 DMA

Bringing communities together, ultimately making them more cohesive and inclusive is in line with our legacy commitments. This is the reason why we have developed partnerships with various associations and NGOs, by supporting various festivals and events, which involve, among other things, the involvement of young people, linking us to our inherited commitment to inspire and improve the skills of the next generation.

## GRI 413 DMA

For OTP Bank Romania, Corporate Social Responsibility is a business philosophy integrated into the business strategy and influences the decisions taken in many aspects of the company's life. The Bank is part of the society and understands the social and environmental impact it has on the communities to which it belongs.

All sustainable development actions and interactions with partners aim to generate positive effects in the economy and society, meeting the present needs without compromising the ability of future generations to satisfy their own needs.

Sustainable development implies economic growth, together with the protection of society and environmental quality.

OTP Bank Romania supports consistent education because it is the most efficient method of development and provides the tools needed for change towards sustainability. Raising awareness of the importance of education is a fundamental pillar without which the company cannot guarantee the survival or success of a business.



### The most important projects of 2021

#### OTP Bank Romania Foundation

OTP Bank Romania Foundation is the most important pillar of social responsibility of OTP Bank, assuming its role of becoming one of the main pylons of educational transformation in Romania

In its 7 years of activity, the Foundation has accumulated an important portfolio of educational projects built on four main pillars: financial education, children's education, career guidance and strategic partnerships with local associations and NGOs.

Apart from Financial Education Programs, described in chapter 3.5, the OTP Bank Romania Foundation has valuable contribution on the Romanian market on several other directions:

- One strategic partnership is the national **digital educational program „Online Lesson”**, developed together

with the Federation of Free Trade Unions in Education (FSLI), which addresses the didactic personnel from the pre-university system that has activities of teaching/ leadership, guidance and control. The program aims to develop the digital abilities with immediate applicability in the design, implementation, evaluation and improvement of the online lessons. During 2021, more than **500 teachers** participated in the training sessions. Currently, the sessions that started at the end of last year are in full swing.

- Also in 2021, the OTP Bank Romania Foundation was involved, as a content creator, in designing a **leadership and communication program** that aims, on one hand, to build a leader profile for candidates on management positions in schools and, on the other hand, to improve communication within schools. The program, the result of a strategic partnership between the Foundation and the Federation of Free Trade Unions (FSLI), was launched last year by organizing two learning sessions for trainers, followed by two more

workshops. The goal of the program is to train **620 leaders** this year.

- Another achievement is the launching of the **„Neuroscience in the classroom” program**, developed by OTP Bank Romania Foundation, Mind Architect and other partner organizations, with the support of the Ministry of Education. The program is dedicated to both teachers and students in primary, secondary, high school and university, and aims to introduce in schools the subject of self-knowledge based on neuroscience and psychology applied in everyday life, with the help of support materials for teachers. Last year, **3,000 teachers** signed up on the project's digital platform to be able to participate directly in the implementation of the program in schools.
- The year 2021 also marked the beginning of the first project with European funding, **“Manager in action”**, in which the OTP Bank Romania Foundation assumed both the role of leader and that of content creator. Thus, a complex educational product has been developed for the students

of the faculties with economic profile and that responds to their needs to put into practice the theoretical information acquired during the university courses. Apart from the Foundation, partners in the project are the Bucharest Academy of Economic Studies and the Romanian Association of Management Consultants (AMCOR). The objective of the program is to organize internships **for 284 economics** students.



**4.404**

**teachers, leaders, students participated in training/workshop sessions (face to face and online)**

During the Summer School, besides supporting entire event, our colleague, Steliana Moraru, Head of Marketing and Digital Transformation, was one of the speakers at the event. She debated in the Pandemic Business panel about the digital transformation strategy, innovative projects, or lessons learned from our clients.

### OTP Sport program

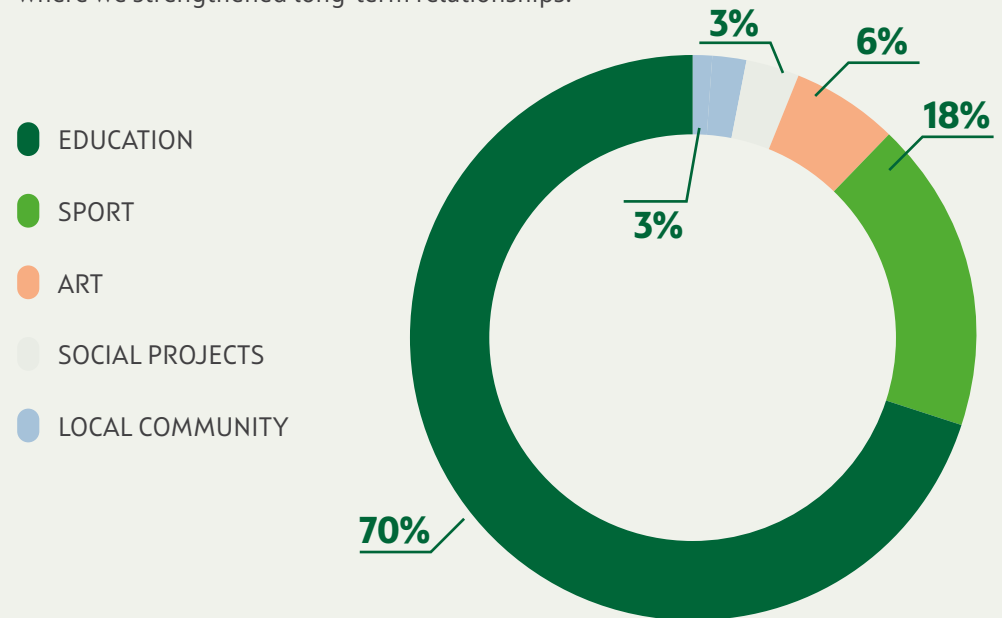
OTP Bank Romania is pleased to partner with a variety of sports teams, helping to bring excitement to our customers across the country.

### Sponsorship activity

In 2021, OTP Bank Romania sponsored the activities of 9 associations or institutions in various fields: education (70%), sport (18%), art (6%), social projects (3%), local community (3%).

### Distribution of the budget by type of sponsorship%:

The three most important areas of sponsorship were education, health and sports, where we strengthened long-term relationships.



### Other projects:

• **OTP Leasing Romania (OLR) supported in 2021 the Summer School „Romania of the 21st Century” projects organized by the Volunteers for Ideas and Projects (VIP).**

VIP is a non-governmental, non-profit, volunteer-based organization made up exclusively of students.

With over 20 years of experience, VIP develops several programs that provide guidance and new skills for the young generation. OLR is a long-term educational partner for VIP, providing in-kind sponsorships and speakers/ mentors from our team.





## The main organizations and projects supported in 2021 were:

### Romanian Association of Banks (ARB)

The Romanian Association of Banks is one of the strongest professional associations in Romania which represents the entire banking market – made up of 34 banks active as Romanian or foreign legal persons in the financial sector.

### Factors Chain International (FCI)

FCI was set up in 1968 as an umbrella organization for independent factoring companies around the world. Today it has grown into the world's representative factoring network and association with more than 400 members in 90 countries.

### Hungarian Business Association in Romania

The Hungarian Business Association in Romania is primarily the integrating organization of companies with Hungarian ownership background, which – besides representing its member's interests and facilitating the professional development and cooperation aims to strengthen the bilateral, Hungarian-Romanian business relations and the development of the recent Romanian economy.

### Foreign Investors Council

The FIC's main objective is to promote sustainable economic growth by improving Romania's investment landscape.

### Romanian Banking Institute

The Romanian Banking Institute legal person without patrimonial purpose founded in 1991

by the National Bank of Romania (NBR) and the Romanian Banking Association (RBA) has the main objective of improving the professional training and specialization of staff from the financial-banking sector, in line with the strategy determined by the National Bank of Romania (NBR), in cooperation with the Romanian Banking Association (RBA) and with the programmes approved by the Board of Directors.

### Alternative Banking Dispute Resolution Centre

The Alternative Banking Dispute Resolution Centre, is an independent non-governmental apolitical, not-for-profit legal entity of public interest established on alternative resolution of disputes between consumers and traders, which transposes on national level, the Directive 2013/11/UE on alternative dispute resolution of consumer disputes and amending Regulation (CE) No. 2006/2004 and Directive 2009/22/CE.

### Association Of Financial Companies From Romania (ALB)

(OTP Leasing Romania IFN SA is member of ALB since 2007)

Founded in 2004, the Association had as its initial purpose the representation of a single financial industry the banking leasing industry and was named ALB Romania, after the name of the represented industry.

Over time, the Association has defined its role as a representative body of non-banking financial institutions, accepting among the members and companies in the consumer credit industry and payment institutions. Currently, ALB Romania members finance leasing and / or grant consumer loans to

a significant number of clients, individuals and legal entities, at national level and / or offer their clients complex financial services, as payment institutions. Under the umbrella of the Association, professionals from the non-banking financial industries gather today, ready at any time to find together responsible and correct solutions for the challenges encountered in their activity and, at the same time, to understand and meet the needs and expectations of their clients. At the macroeconomic level, the Association continues to be the bridge between its members, on the one hand, and the authorities, the media and other professional organizations, on the other hand, and, as such, its mission is to promote solutions and the innovative ideas of the represented financial industries, in order to sustain and constantly improve the business environment in Romania. Defining the priorities of its members, ensuring their cohesion and team spirit, building and respecting rules of good practice are the main attributes of the Association through which it ensures the development of solid business relations both between its members and in relations with customers, authorities, media or other professional organizations.

### Covasna County Agency for Employment

member: OTP Consulting)  
The agency ensures the implementation of measures to prevent unemployment; implementation of measures to stimulate employment; ensuring the social protection of the unemployed, vocational guidance and counseling for the unemployed and other people, in order to find a job; mediating between supply and demand in the labor market; qualification and retraining of non-employed persons; support for individuals and legal entities, providing assistance and



advice for the creation of small and medium enterprises.

### Volunteering

According to OBR Collective Labour Contract, the employees benefit from 2 days per year for volunteering, based on the documents justifying the undertaking of some volunteer actions.

Employees from OTP Bank Romania and all the subsidiaries were involved in the following campaigns with donations:

„**Letters for Santa Claus**” - 262 presents for children in need;

„**Back to school - 130 backpacks for disadvantaged children in rural areas**”;

„**Rural library**” - 300 books donated for a rural library;

„**Internal volunteering campaign for Children's Day**” - presents for 233 children from marginalized areas of Romania;

„**Internal volunteering campaign for the Easter Holidays**” - presents for 212 children;

„**Spring sweatshirt campaign**” - presents for 70 children from disadvantaged areas.

### Encouraging an environmental friendly behavior

We organized an awareness campaign regarding power saving and use of common spaces in the Head Office. Stickers with key messages were placed in the most frequently accessed locations.

### Sponsorship policy and goals for 2022:

For 2022, our plans are to continue:

- to support the education through the OTP Bank Romania Foundation and partnerships with universities;

- the sponsorship initiatives developed and

implemented under the umbrella of the OTP Sport Program, through which we promote sports organizations, competitions and leisure activities that involve physical and mental endurance, concentration, tactical skills and teamwork;

- to support through sponsorships organizations as many marginalized children and young people as possible.

In addition, concern for climate, human well-being and corporate governance are important and present aspects in the current development of OTP Bank Romania. The company plans to develop the strategy and intensify actions in these areas, achieving the premises of the ESG policy.

- CSR/sustainability KPIs: Annual preparation of the local CSR report.

### Promoting gender equality:

With continuous focus from the company on internally promotion of gender equality, OTP Bank Romania initiated, in September 2021, GirlPower, the bank's complex mentorship program dedicated to women, led by the two most powerful women in OTP Bank Romania. The objective of the program was to develop pathways and generate professional opportunities for young women, aged 18-26, who want to develop their knowledge and professional skills.

At the end of the six-months mentorship program, in 2022, the finalists will receive a scholarship and will have the chance to choose, together with their mentor, a professional training program, a course, master, or specialized studies, worth the scholarship granted by OTP Bank Romania. OTP Bank Romania has made decisions aligned with its principles and this shows, especially in sensitive times like these, that the bank's character and values are authentic.



# GRI Content Index

The GRI content index table shows which indicators and requirements of the GRI (Global Reporting Initiative) Standards reporting standard used for this sustainability report we are reporting on and where the related information may be found



Indicator number	Indicator description	Where to find it OBR 2021	Note / Reasons for omission
<b>GRI 102: General disclosures 2016</b>			
<b>Organisational profile</b>			
102-1	Name of the organisation	back cover	
102-2	Activities, brands, products and services	p.7	The subsidiary websites are available from the website
102-3	Location of Headquarters	p.8	
102-5	Ownership and legal form	Annual Report, Website	Annual report, p.68,174
102-6	Markets served	p.7, p.8, p.29	For more detail, see the Annual report,
102-7	Scale of the organisation	p.8	
102-8	Information on employees and other workers	p.38	
102-10	Significant changes to the organisation or its supply chain	p.3, p.4	
102-11	Precautionary Principle or approach		
<b>Strategy</b>			
102-14	Statement from senior decision-maker	p.5	
<b>Ethics and integrity</b>			
102-16	Values, principles, standards and norms of behaviour	p.32, GRI Index	Code of Ethics: A standard Code of Ethics is in force at all members of OTP Group; any deviations are due to compliance with local laws. The Code is available on the websites of OTP Bank and the subsidiaries. Ethical and transparent business conduct
<b>Governance</b>			
102-18	Governance structure	p.15	Board of Directors, Supervisory Board, Executive Board and Management
<b>Stakeholder engagement</b>			
102-43	Approach to stakeholder engagement	p.17, p.41	
102-44	Key topics and concerns raised	p.17, p.41	

Indicator number	Indicator description	Where to find it OBR 2021	Note / Reasons for omission
<b>Reporting practice</b>			
102-45	Entities included in the consolidated financial statements	p.3	The entities included in the organisation's consolidated financial statements are listed in the Annual Report
102-46	Defining report content and topic Boundaries	p.3	
102-47	List of material topics	p.3.	
102-50	Reporting period	p.3	
102-51	Date of the most recent report	GRI index, website	Our most recent CSR Report was issued for 2020 <a href="https://www.otpbank.ro/ro/despre-otpbank/responsabilitate-sociala/rapoartea-csr">https://www.otpbank.ro/ro/despre-otpbank/responsabilitate-sociala/rapoartea-csr</a>
102-52	Reporting cycle	p.3	
102-53	Contact point for questions regarding the report	GRI index	<a href="https://www.otpbank.ro/ro/despre-otpbank/responsabilitate-sociala/rapoartea-csr">https://www.otpbank.ro/ro/despre-otpbank/responsabilitate-sociala/rapoartea-csr</a>
102-54	Claims of reporting in accordance with the GRI Standards	p.3	
102-55	GRI content index	GRI index	
<b>List of material topics</b>	<b>The general principle we follow in respect of 103-3 indicators is to (also) use the specific indicators of a particular topic as part of our assessment, while the expected indicator data are used as the result. With other assessment methods, the presentation of the results always includes a clear reference to the method applied.</b>		
<b>GRI 201: Economic performance 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.3, p4, p.5, p.7, p.13	Ethical and transparent business conduct
103-2	The management approach and its components	p.5, p.7, p.13	
103-3	Evaluation of the management approach	p.5, p.7, p.13	Annual report

Indicator number	Indicator description	Where to find it OBR 2021	Note / Reasons for omission
<b>GRI 202: Market presence 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.13	
103-2	The management approach and its components	p.13, p.15	
103-3	Evaluation of the management approach	p.15	
<b>GRI 203: Indirect economic impacts 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.13, p.17	
103-2	The management approach and its components	p.13, p.17	
103-3	Evaluation of the management approach	p.13, p.17	
203-2	Significant indirect economic impacts	p.9, p.13, p.25, p.28	
<b>GRI 205: Anti-corruption 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.32	Ethical and transparent business conduct Code of Ethics
205-2	Communication and training on anti-corruption policies and procedures	GRI index, p.32, p.37, p.39	Ethical and transparent business conduct The Anti-Corruption Policy is available on the websites of member companies. Each year the members of the governing bodies sign off on the Code of Ethics, i.e. they were fully – 100% – informed. They do not receive training. All employees receive annual training and information as a part of compliance training. We consider commissioned agents and suppliers as our business partners; all partners currently contracted to us were informed about the Code of Ethics at the time of contracting.
<b>GRI 206: Anti - competitive behavior 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.32	
103-2	The management approach and its components	p.32	
103-3	Evaluation of the management approach	p.32	

Indicator number	Indicator description	Where to find it OBR 2021	Note / Reasons for omission
<b>GRI 302: Energy 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.45	Environment protection
302-1	Energy consumption within the organisation	p.45	
<b>GRI: 305 Emissions 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.45	Environment protection
103-2	The management approach and its components	p.45	Environment protection
103-3	Evaluation of the management approach	p.45	
305-1	Direct (Scope 1) GHG emissions	p.4	We do not apply a base year.
305-2	Energy indirect (Scope 2) GHG emissions	p.4	We do not apply a base year.
<b>GRI: 307 Environmental compliance 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.32	Ethical and transparent business conduct
103-2	The management approach and its components	p.32	Ethical and transparent business conduct Environment protection
103-3	Evaluation of the management approach		Ethical and transparent business conduct Environment protection
<b>GRI: 401 Employment 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.41	Responsible Employer
103-2	The management approach and its components	p.41	Responsible Employer
401-1	New employee hires and employee turnover	p.43	
401-3	Parental leave	p.43	
<b>GRI: 402 Labour/management relations 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.41	
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
402-1	Minimum notice periods regarding operational changes		

Indicator number	Indicator description	Where to find it OBR 2021	Note / Reasons for omission
<b>GRI: 403 Occupational health and safety 2018</b>		p.43	
103-1	Explanation of the material topic and its Boundary		
103-3	Evaluation of the management approach		
403-6	Promotion of worker health	p.43	
<b>GRI: 404 Training and education 2016</b>			
103-2	The management approach and its components	p.42	Responsible Employer
103-3	Evaluation of the management approach	p.42	Responsible Employer
404-1	Average hours of training per year per employee	p.42	
404-2	Programmes for upgrading employee skills and transition assistance programmes	p.42	Responsible Employer
<b>GRI: 405 Diversity and equal opportunity 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.37, p.39	Responsible Employer
103-2	The management approach and its components	p.37, p.39	Responsible Employer Ethical and transparent business conduct Code of Ethics
103-3	Evaluation of the management approach	p.37, p.39	
405-1	Diversity of governance bodies and employees	p.37, p.39	Data on ethnic background is not listed owing to statutory regulations.
405-2	Ratio of basic salary and remuneration of women to men	p.41	
<b>GRI: 406 Non-discrimination 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.32	Ethical and transparent business conduct
406-1	Incidents of discrimination and corrective actions taken	p.32	
<b>GRI: 410 Security practices 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.32	Safety
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
410-1	Security personnel trained in human rights policies or procedures	GRI index	The training is provided in the framework of the training dedicated to the Code of Ethics, which is completed by all employees. The transformation of our practices is in progress; from 2022 all security guards will receive this training.



Indicator number	Indicator description	Where to find it OBR 2021	Note / Reasons for omission
<b>GRI: 413 Local communities 2016</b>		p.47	The basic indicators in the GRI Standards (413-1 and 413-2) do not apply to OTP. The requirements are useful for presenting the management of the impacts of operations different from those of the Bank (e.g. extraction, manufacturing); the negative impacts do not apply to the Banking Group in the form represented by the indicators.
103-1	Explanation of the material topic and its Boundary	p.17	
103-2	The management approach and its components	p.13, p.17	
103-3	Evaluation of the management approach	p.13, p.17	
FS13	Access points in low-populated or economically disadvantaged areas by type	p.9	
<b>GRI: 415 Public policy 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.32	OTP Group is committed to reporting on political contributions
103-2	The management approach and its components	p.32	Code of Ethics
103-3	Evaluation of the management approach	p.32	
415-1	Political contributions	GRI index	OTP does not sponsor such persons or organisations.
<b>GRI: 417 Marketing and labelling 2016</b>		p.32	
103-1	Explanation of the material topic and its Boundary	p.17, p.23	Correct and credible information Development of financial literacy
103-2	The management approach and its components	p.17, p.23	Correct and credible information Development of financial literacy
103-3	Evaluation of the management approach	p.17, p.23	Development of financial literacy
<b>GRI: 418 Customer privacy 2016</b>		p.32	
103-1	Explanation of the material topic and its Boundary	p.32	Security and risk management
103-2	The management approach and its components		Security and risk management
103-3	Evaluation of the management approach		Security and risk management

Indicator number	Indicator description	Where to find it OBR 2021	Note / Reasons for omission
<b>GRI: 419 Socioeconomic compliance 2016</b>			
103-1	Explanation of the material topic and its Boundary	p.32	Ethical and transparent business conduct
103-2	The management approach and its components	p.32	Ethical and transparent business conduct
103-3	Evaluation of the management approach	p.32	Ethical and transparent business conduct Corporate Governance Report
419-1	Non-compliance with laws and regulations in the social and economic area	GRI index	We classify into this category all proceedings other than proceedings brought due to the breach of environmental legislation.
<b>GRI: Product portfolio (sector-specific)</b>			
103-1	Explanation of the material topic and its Boundary	p.4	Security and risk management
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/ large) and by sector	p.29	
FN-CB-410a.1	Commercial and industrial credit exposure, by industry	p.29	We present assets by sector.
FN-CB-510A.2	Description of whistleblower policies and procedures	website	System of reporting unethical conduct