

# Social media policy

## 1. Purpose and scope of the regulation

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

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

The purpose of this Social Media Policy ("Policy") is to define the rules for using the Bank's own social media platforms and to facilitate the OTP banka's transparent, uniform and brand-conform communication.

The Policy is applicable to the Bank's managers and employees who are in charge of managing the Bank's official social media platforms or officially represent the Bank in social media.

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

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

## 2. Principles of the Bank's social media communication

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

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

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

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

### 2.2. Fundamental requirements of OTP banka's own contents

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

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

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

### 2.3. Statement order

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

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

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

## **2.4. Managing and moderating the social media platforms of OTP banka**

The Policy posted on OTP banka Facebook profile is applicable to all visitors of OTP banka social media sites and are mandatory for all users.

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

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

## **2.5. Commercial communication of intermediaries**

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

## **2.6. Partnerships**

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

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

## **3. Guidelines on the use of social media by employees**

### **3.1. Separation of personal and professional opinions**

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

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

### **3.2. Be open and polite, build solid professional relationships**

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

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

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

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

### **3.3. Be responsible – Comply with the Code of Ethics**

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

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

- Respect the religious beliefs, national and ethnic origin, sexual orientation, political and philosophical views of others.
- Refrain from inciting violence or hatred or sharing of contents suitable to incite violence or hatred directed to a group of people, or a member of a group based on political, racial, national ethnic, cultural, religious or other basis, including language, background, skin colour, gender, sexual affiliation, gender identity, disability or any other qualities, and from the publication of unlawful materials or materials that encourage others to engage in unlawful activities.
- In social media refrain from vulgar, degrading, defaming, slandering or desecrating expressions, and do not publish a false sound or video recording that is suitable to harm the reputation of others. Moreover, avoid all hurtful or overly personal comments. Be aware that a comment may be perceived as acceptable or even funny by some and hurtful by others.
- In addition, refrain from using the name of the Bank in order to promote or advocate any product, issue, religious belief, political party, candidate, etc.

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

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

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

### **3.5. When in doubt, ask!**

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

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

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

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

The Compliance Department is available at [eticki.kodeks@otpbanka.hr](mailto:eticki.kodeks@otpbanka.hr) to receive notifications from employees should they detect any behaviour or content in social media that violate the provisions of this Policy or the Code of Ethics. The Bank investigates all notifications and concerns submitted in relation to social media content.

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