

# COMPETITION POLICY

The main objective of the Competition Policy of MBH Bank Plc („Bank”) is to ensure the effective compliance of the Bank with competition law. The Bank’s employees must comply in all circumstances and must also comply with their colleagues with the applicable Hungarian and EU competition rules, which encourage companies to compete for customers, resulting in fair markets where businesses and customers enter into fair and mutually beneficial agreements.

In the light of the above, the Bank aims to minimise the risk of competition law infringements through its Competition Policy, as in the event of a breach of the rules the Bank faces the risk of regulatory fines, loss of reputation, damages actions and the additional costs of regulatory proceedings that may follow.

## **IN LINE WITH THE ABOVE OBJECTIVES, THE GROUP HAS ANNOUNCED A COMPETITION COMPLIANCE PROGRAMME, THE KEY ELEMENTS OF WHICH ARE:**

- building employee engagement through appropriate incentives and sanctions,
- continuous evaluation and improvement of the programme,
- monitoring and auditing.

The Bank strives to achieve the highest level of compliance with competition law (in particular Act LVII of 1996 on the Prohibition of Unfair Market Practices and Restrictions of Competition and the Treaty on the Functioning of the European Union).

The Policy defines the basic concepts of competition law and details the components of a system and procedures to ensure the highest possible level of compliance by the Bank and its employees with competition law.

The commitments and objectives of the senior management and the Bank as a whole, as set out in the Policy, are translated into practice in a complex and continuously evolving framework.

In addition to the above, the Competition Policy sets out in detail the following provisions:

1. Institutional and staffing requirements: within the Law and Governance area, recognising the importance and complexity of compliance, the Corporate Governance and Corporate Legal area deals with competition law, led by a manager with nearly a decade of senior management experience, and supported by a dedicated competition law area of an international law firm. Its effectiveness and compliance within the organisation is reinforced by the fact that this area is directly managed by the highest level legal manager in the banking group. The Bank defines in its internal rules the responsibilities of its employees, the procedures to be followed and provides professional support to all areas of the Bank.
2. Regulatory requirements: competition compliance at the Bank is governed by the Competition Policy, which is regularly reviewed by the Law and Governance area. The purpose of the policy is to inform the Bank’s employees about competition law.
3. requirements and to establish specific rules and procedures to effectively prevent breaches of competition law. The scope of the Policy covers all departments and employees of the Bank. In the spirit of unification, the Policy has been implemented by the member banks.
4. Training requirements: as in other areas, it is the Bank’s conviction and an important objective to develop the professional skills of its employees, to provide them with a broad theoretical and practical education in competition law and to impart the relevant knowledge. The training is designed to ensure that employees are able to identify situations relevant from a competition law point of view, to act or refrain from acting in a way that promotes compliance, and to seek help and support from the competent areas, in particular the competent legal area. Competition law training is provided through e-learning for some employees, but HR and Legal may jointly organise an annual face-to-face interactive competition law training for senior employees. As part of orientation, new entrants are required to be familiar with the Policy and make it binding on themselves at the start of their employment, and those in employment can learn about competition law through competition law training. These measures are all designed to promote competition law compliance.
5. Provisions on the anonymous reporting system and the investigation procedure: under the Competition Policy, employees have the possibility to report anonymously in case of suspicion, under which it is strictly forbidden to investigate who made the report, the identity of the anonymous reporter remains confidential and no one can suffer any disadvantage for doing so. In addition, the Policy lays down procedures for the conduct of the investigation and its full implementation.
6. The Bank will deal with any enquiries from the authorities and cooperate with the competition authority in accordance with its Competition Policy, in compliance with the law.

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