

Annex 22

to the Business Terms and Conditions for bank accounts managed by the Magyar Nemzeti Bank and for settlements of forint and foreign exchange transactions:

3 August 2026.

DECLARATION OF CONFORMITY^{1 2}

on the existence of conditions relating to safeguarding client funds necessary for participation in VIBER and the corporate governance system, as well as the submission of an insolvency plan

I, the undersigned, (name of institution, registered office, company registration number), as the applicant payment institution / institution issuing electronic money, hereby declare and attach the necessary documents on the basis of Section 86/E of the Act CCXXXV of 2013 on Certain Payment Service Providers (hereinafter referred to as "Payment Service Provider Act").

I. Safeguarding client funds

1. Description of measures to safeguard clients' funds.

- ☐ Separating on deposit account
- ☐ Placement in safe, liquid instruments
- ☐ Guarantee or surety insurance
- ☐ Other (specify)

2. If the safeguarding is deposit account/instrument-based:

- a) Description of investment policy, ensuring that the selected instruments are liquid, secure, and low-risk:

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¹ If the document in question has already been submitted to the Supervisory Authority via the ERA system, it is sufficient to refer to the identification number provided by the ERA system. A payment service provider established in another EEA Member State shall, on the basis of its personal right, certify compliance with Article 35a of the Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC (PSD2). If, under the law of the Member State, the applicant determines compliance by means of an official decision rather than self-assessment, it is not necessary to carry out a self-assessment, but the official decision on this matter shall be submitted as an annex to this declaration.

² Completion of this annex is mandatory in all cases. If you submit an Auditor's Report, we always expect you to indicate the appropriate section of the report in response.

- b) The number of persons who have access to the accounts used for protection purposes and their positions:
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 - c) Description of the administrative and consultation process that ensures that, in the interests of clients, their funds are protected against the claims of other creditors of the institution, particularly in the event of insolvency:
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 - d) Draft agreement to be concluded with the credit institution: [] attached
 - e) Declaration of conformity pursuant to Sections 46 and 51 of the Payment Service Provider Act:
[] attached
3. If safeguarding is provided under a guarantee or surety insurance contract concluded with a credit institution or insurance company:
- a) the guarantee or surety insurance contract concluded with the credit institution or insurance company originates from a legal entity that does not belong to the group of the payment institution, institution issuing electronic money: []
 - b) Detailed description of the consultation process, according to which the guarantee or surety insurance contract is sufficient at all times to perform the obligations of the payment institution or institution issuing electronic money to provide safeguarding:
 - c) Collateral period, renewal conditions:
 - d) Copy of agreement / draft: [] attached

II. Corporate governance and internal control systems or mechanisms

I. In relation to the description of the governance systems and internal control mechanisms – including administrative, risk management and accounting procedures – for the payment services or electronic money services to be provided by the payment institution or institution issuing electronic money, demonstrating that the corporate governance systems and internal control mechanisms are proportionate, appropriate, well-founded and adequate:

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Detailed description of corporate governance systems and internal control mechanisms:

1. Identification of risks and description of management procedures, i.e. mapping the risks identified by the payment institution or institution issuing electronic money, including the type of risks and the

procedures that the payment institution or institution issuing electronic money applies or implements to assess and prevent such risks:

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2. Description of control procedures, i.e. the various procedures for performing periodic and ongoing controls, including the frequency of controls and the human resources allocated for this purpose:

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3. Description of accounting procedures, within the framework of which the payment institution or the electronic money institution records and reports its financial information:

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4. Identity of the person(s) responsible for internal audit, risk control functions, and compliance functions – including those responsible for periodic, permanent, and compliance monitoring – as well as the up-to-date curriculum vitae of the person(s) (CV attached):

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5. Name and details of the auditor, and the identity of any auditor who does not qualify as a legally authorized auditor:

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6. Composition of senior management and, where applicable, any other body or committee acting in a supervisory capacity:

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7. Description of the monitoring and control of outsourced activities, where the purpose of the description is to assess how the payment institution or electronic money institution avoids the deterioration of the quality of its internal controls:

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8. Description of how payment agents and branches are monitored and controlled within the framework of the internal controls of the payment institution or electronic money institution:

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9. Description of group governance, if the payment institution or electronic money institution is a subsidiary of a regulated undertaking located in another EEA State:

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II. Regarding the rules of the payment institution or the electronic money institution on the use of information and communication technology services,

1. confirmation that they are proportionate, appropriate, well-founded and adequate:
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2. a detailed description in relation to Articles 6 and 7 of Regulation (EU) 2022/2554 of the European Parliament and of the Council:
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III. Winding-up plan in case of failure

1. Description of the plan prepared for the event of insolvency of the payment institution or the electronic money institution:
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2. Demonstration that the insolvency plan has been adapted to the institution's planned size and business model:
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3. Description of the following risk mitigation measures to be adopted by the payment institution or the electronic money institution in the event of the termination of payment services:
 - 3.1. Ensuring the execution of pending payments:
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 - 3.2. Process for the termination of existing contracts:
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IV. List of Annexes

- Draft agreements / agreements (for points 2.d and 3.d)
- Declarations (on compliance with Sections 46 / 51 of the Payment Service Provider Act)
- Details and up-to-date curriculum vitae of the person(s) performing internal audit
- Winding up plan document
- Auditor's Report for declaration conformity in accordance with ISAE 3000
- If available, official decision regarding conformity (in the case of a payment institution having its registered office in another EEA Member State)

Dated:

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Name of the institution submitting the declaration of conformity:

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Name and signature of the person authorized to represent the institution (if the institution assesses its compliance within the framework of self-assessment)