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**A1**

**SUSTAINABILITY  
STATEMENT**



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# 1


## GENERAL INFORMATION

General requirements for preparing the  
sustainability statement

Governance and Responsibilities

The strategy and business model

Impacts, risks and opportunities



## 1. GENERAL INFORMATION

### 1.1. General requirements for preparing the sustainability statement

#### RD BP-1 - General requirements for preparing the sustainability statement

The Sustainability Statement of Banca Transilvania Financial Group ("BTFG", "the Group"/"BT Group"/"we"/"us"/"our", "the company". "the undertaking") has been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD), transposed into Romanian law by Order No. 1 of the National Bank of Romania (BNR) of May 16, 2024 for the amendment and supplementation of Order No. 27/2010 of the National Bank of Romania, and with the European Sustainability Reporting Standards (ESRS) issued by the European Financial Reporting Advisory Group (EFRAG).

The taxonomy information has been reported in accordance with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on establishing a framework to facilitate sustainable investment, Delegated Regulation (EU) 2021/2178.

The information presented in the sustainability statement covers the financial year 2024 (January 1 - December 31)

The Sustainability Statement has been prepared on a consolidated basis and includes both the parent company and all its subsidiaries, in accordance with the consolidation principles applied in the preparation of the financial statements of Banca Transilvania Financial Group. With the exception of OTP Bank, for none of the Group's subsidiaries the requirement for independent reporting as of December 31, 2024, is applicable. OTP Bank benefits from the exemption under Annex 1, item 14, paragraph (17) of NBR Regulation No. 1 from the requirement to include the sustainability statement in the directors' report. Further information on the scope of consolidation can be found in the consolidated financial statements in Note1: Reporting Entity

The statement was audited as an independent limited assurance service. The assurance service was provided by Deloitte Audit SRL

#### Omitted Information

The Group does not disclose comparative information in the first year of preparation of the Sustainability Statement under the ESRS, except for the EU Taxonomy and the carbon footprint. However, where the Group has previously disclosed information that is covered by the statutory audit of the Group's financial statements or limited assurance, this information has been included as comparative information in 2024.

No confidential or sensitive information relating to intellectual property, know-how or innovation results have been omitted from the Sustainability Statement. In addition, we have not made use of the option to omit the disclosure of imminent developments or matters under negotiation.

Quantitative data in the Sustainability Statement are reported in the relevant unit of measurement for each indicator, e.g. monetary values in RON, greenhouse gas emissions in tons of carbon dioxide equivalent in tCO<sub>2</sub>e.

All aspects of sustainability under the ESRS are reported at the Banca Transilvania Financial Group level. The sustainability strategy and framework policies are in principle applicable to the entire Group and all subsidiaries, unless explicitly stated otherwise in the relevant chapters of the statement.

### Value chain information

The double materiality analysis was conducted between June 2024 and December 2024, in accordance with ESRS requirements, and focused on identifying impacts, risks and opportunities along the entire value chain of the BTFG Group, as described in the *Impacts, Risks and Opportunities sub-section*.

In this analysis, the following were covered:

- Value chain - upstream
  - IT systems and equipment providers
  - Payment service providers
  - Cleaning, security providers
  - Clients with deposits
  - Investors in bonds issued by the bank
  - Business partners (lawyers, consultants, auditors)
  - NGOs
- Value chain - own transactions
  - Buildings, IT equipment, direct consumption, fleet
  - Human Resources
  - Governance and compliance
  - Legal
  - IT
- Value chain - downstream
  - Retail
  - Non-retail
    - Micro-enterprises
    - SMEs
    - Medium size companies
    - Corporations
    - Treasury
    - Other segments (Corporate Center)
  - Leasing
  - Asset management
  - Pension fund

- Insurance

The Sustainability Statement covers the material aspects of our value chain, with a particular focus on the portfolio (downstream), as this revealed the most significant impacts, risks and opportunities. This approach enables stakeholders to fully understand the extent of our sustainability impacts and the steps we are taking to mitigate negative impacts along the value chain.

## BP-2 – Reporting under specific requirements

### Time horizons

The Group's material impacts, risks and opportunities have been assessed in the short, medium and long term, in accordance with the general principles set out in ESRS 1. In the sustainability statement, the time horizons for disclosures on the Group's material impacts, risks and opportunities are defined as follows

- "short term": 1 year; short term refers to the reporting period of the financial statements
- "medium term": 1-5 years
- "long-term": over 5 years

### Assumptions, estimates and approximations

Some indicators include value chain information, obtained either directly from customers and the companies in which the Group invests or finances, or indirectly from external databases or industry-wide estimates.

The most significant uncertainties are associated with the reporting of greenhouse gas (GHG) emissions, for Scope 3, due to methodological limitations and reliance on data from external sources. Reporting according to the **EU taxonomy** also has limitations in terms of data quality and accessibility. Further details can be found in the Environmental Information chapter, and relevant sub-chapters (Taxonomy Information, Climate Change).

The level of accuracy obtained for these indicators depends largely on the quality and accessibility of the external data sources used. Although we aim to calculate the indicators with a high degree of precision, the uncertainties inherent in the estimates make it important to interpret them in the light of these limitations

To improve the quality of reported data, we are investing in more efficient data collection methods and refining best practice methodologies.

## Standards used to calculate or report certain indicators

In addition to the ESRS requirements, the company has utilized the [GHG Protocol Corporate Accounting and Reporting Standard GHG](#) and the Partnership for Carbon Accounting Financials (PCAF), a global standard used by financial institutions to measure and disclose greenhouse gas (GHG) emissions associated with their loan and investment portfolios, for its emissions methodology.

## 1.2. Governance and Responsibilities

### DR GOV-1 - Role of administrative and management bodies

The management structure of Banca Transilvania includes: the supervisory body - the Board of Directors, composed of 7 non-executive members, and the senior executive management - the Leaders Committee, composed of 8 executive members, hereinafter referred to as the *management bodies*

Within the subsidiaries that are part of the Banca Transilvania Financial Group (BTFG), the management structure is similar, as mentioned in the section dedicated to each of them below.

The members of the Board of Directors (BoD) are elected by the shareholders, at the GMS, for a 4-year term, in accordance with the specific regulations issued by the NBR, the body with the guidance, coordination, supervision and control function. It also undertakes analysis and establishes programs on sub-intervals of the management year in order to ensure an appropriate development of the Bank on the market. Within the Bank, it has the following structure:

- Chairman of the Board of Directors
- 6 directors - members of the Board of Directors

[Details on the composition of the Board of Directors, its roles and responsibilities, as well as information on the Committees reporting to it, can be found in Chapter 8 Corporate Governance.](#)

[86% of Board members are independent.](#)

[40% is the gender diversity rate at Board level](#)

## Board of Directors structure by gender and age

BT Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
<30	0	0	0	0	0	0
30-50	0	0	1	14.32	1	14.32
>50	2	28.56	4	57.12	6	85.68
<b>Total</b>	<b>2</b>	<b>28.56</b>	<b>5</b>	<b>71.44</b>	<b>7</b>	<b>100</b>

The members of the **Leaders Committee** (LC) are appointed by the Board of Directors and are required to fulfill the legal requirements, namely to be approved by the NBR before taking up their duties.

[Details on the composition of the Leaders Committee, its roles and responsibilities, as well as information on the Committees reporting to it, can be found in \*Chapter 8 Corporate Governance\*](#)

[12.5%](#) is the gender diversity rate at Leaders Committee level.

## Leaders Committee structure by gender and age

CC BT	Women		Men		Total	
	Nr.	%	Nr.	%	Nr.	%
<30	0	0	0	0	0	0
30-50	1	12,5	4	50	5	62,5
>50	0	0	3	37,5	3	37,5
<b>Total</b>	<b>1</b>	<b>12,5</b>	<b>7</b>	<b>87,5</b>	<b>8</b>	<b>100</b>

With regard to the knowledge, skills and experience of the management body, within Banca Transilvania, the Nomination Committee is responsible for assessing their suitability in accordance with the principles and policies in place for the appointment of personnel, which must be aligned with the Bank's strategy and values.

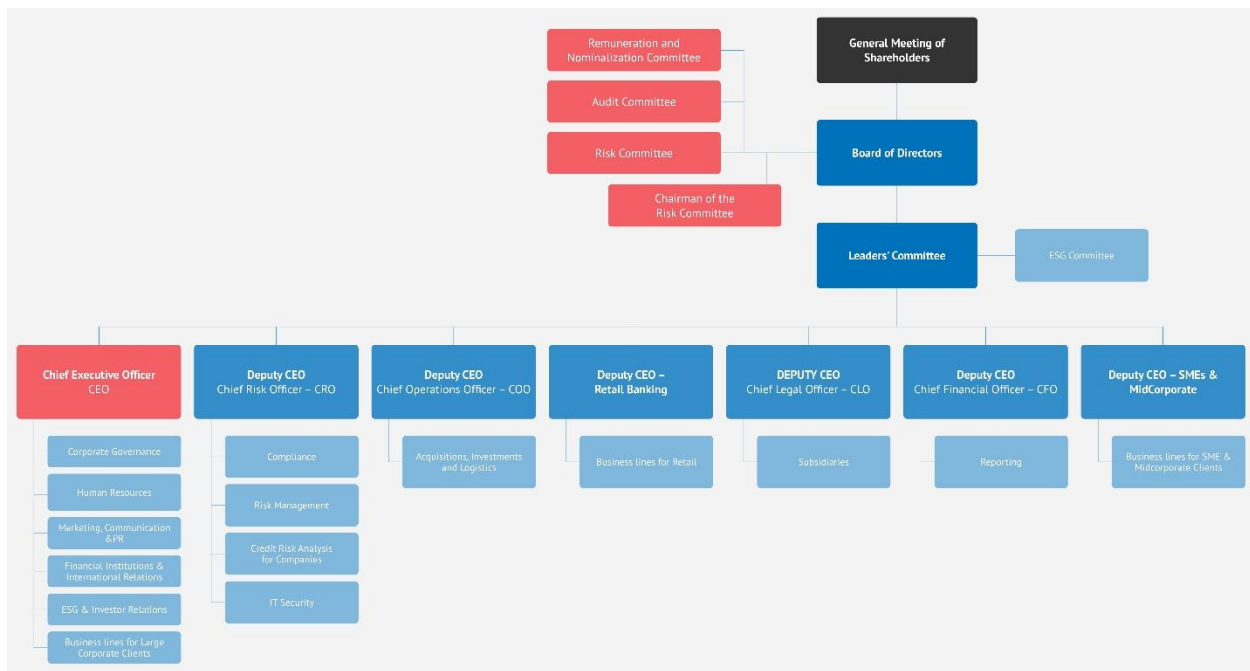
The rules on the assessment of the knowledge and skills suitability of the members of the management body shall also apply at the subsidiaries' level, respecting the principle of proportionality. If a subsidiary does not have a Nomination Committee, the Nomination Committee's duties shall be assigned to the Board of Directors. In view of the limited impact and complexity of the subsidiaries, the assessment of suitability is limited to members of management (directors and executives, where they exist). Subsidiaries issue their own policies and regulations and apply simplified rules, depending on the business' specifications, while respecting the general principles. In case of specific legal regulations, these take precedence over the Group's internal provisions.



The Management Structures at the level of the BT Group's subsidiaries as at December 31, 2024 are presented in Annex 3.

## Sustainable governance

### Governance Structure of Banca Transilvania



The governing bodies have a key role in overseeing the Bank's business conduct, ensuring that the ethical standards are integrated and that the frameworks and governance principles are embedded in all operations' aspects. Key responsibilities of these bodies include establishing and regularly reviewing the ethical standards and policies, such as the Code of Conduct, Anti-corruption and fair competition policies, ensuring compliance with the international standards. They oversee the implementation of compliance frameworks to meet the regulatory requirements and best practices in anti-money laundering, anti-bribery and personal data protection. They also monitor the effectiveness of internal controls and the whistleblowing mechanisms. The Governing Bodies are responsible for integrating ESG (environmental, social, governance) principles into the Bank's activities, including human rights and social responsibility. They consist of experts with various qualifications, providing oversight and strategic guidance for the business conduct. Their responsibilities are reflected in the Policy for Assessing the Suitability of the Management Body Members of Banca Transilvania and Banca Transilvania Financial Group.

**The Annual General Meeting of Shareholders (GMS)** is the highest decision-making authority, which provides strategic direction and approves major decisions impacting the bank's governance and

operations. The GMS sets organizational objectives that include ESG initiatives and allocates resources through the approval of the annual budget to meet the objectives.

**The Board of Directors** has the ultimate authority for overseeing the Bank's strategic direction, including material impacts, risks and opportunities, and monitors the implementation of the sustainability strategy and the compliance with the ESG standards in all activities of the Banca Transilvania Financial Group, both in lending and internal operations. The Board periodically reviews the ESG performance and alignment with the Sustainability Strategy, ensuring that relevant risks and opportunities are appropriately managed. The Chairman of the Risk Management Committee monitors the implementation of the ESG strategy and its integration into the Risk Policies.

**The Audit Committee** verifies the compliance with the applicable ESG regulations.

**The Risk Management Committee** is responsible for conducting a rigorous assessment of the main and emerging risks, including those related to sustainability and governance, that could threaten the Group's capital adequacy and solvency. The Committee has a duty to ensure the alignment of the risk management framework with the business strategy, which includes embedding the ESG risks into the decision-making process and organizational culture, thereby promoting a proactive approach to managing these risks. This helps support a culture of assuming these risks and achieve a strong governance within the Group.

**The Leaders Committee** is responsible for the operational management of the Bank and implements the strategies set by the Board of Directors, including the ESG strategy. It is also responsible for assessing and managing the operational risks and opportunities arising in the business conduct.

**The ESG Committee**, led by the Chief Risk Officer (CRO) and reporting directly to the Leaders Committee, was established by the Bank in April 2024 to coordinate and implement the Bank's sustainability strategy. Its role is to create a robust framework which integrates the ESG factors into risk management, financing practices and stakeholder engagement strategies. The Committee monitors the legislative developments, promotes employees' training and awareness and ensures a transparent reporting of the Group's ESG performance.

Composed of senior leaders, who coordinate sustainability responsible structures, the Committee oversees the ESG initiatives to ensure that they are aligned with the organization's long-term goals. It also identifies relevant risks and opportunities by providing guidance on how to address them and assigns ESG tasks to the appropriate structures in the Bank, thereby facilitating the implementation of the approved ESG strategy.

ESG responsibilities have been assigned to **the Investor Relations & ESG Integration Division** since 2022. These responsibilities include:

- Oversee and implement the Bank's sustainability and responsible business policies, practices and initiatives.

- Define and update the Sustainability Strategy and manage the ESG reporting, including the preparation of the Sustainability Statement.
- Provide the information necessary to obtain the ESG rating.
- Development of the methodology for estimating the emissions resulting from the Group's loan portfolio (Scope 3 emissions).
- Developing the methodology for the implementation of the EU Taxonomy Regulation and reporting the indicators according to this Regulation.
- Coordinating the process of affiliation to domestic and international representative organizations.

The Division acts as a catalyst for embedding sustainability and responsible practices in the organization.

It also contributes to attracting funding from financial organizations acting as project manager, and maintains effective communication relationships to facilitate transactions that support the development of the Bank's business and fulfill its requirements. In addition, coordinates the initiation, organization and completion of due diligence processes, ensuring the archiving and preservation of documentation, managing the counterparty relationship and collaborating with other departments from the bank.

Investor Relations & ESG Integration Division also manages the M&A opportunities from a business perspective, acting as project manager and coordinating the development of the necessary materials. Depending on the case, it is involved in pre- and post-transaction activities from a business perspective.

In the Investor Relations activity, the department aims to maintain qualitative and continuous communication with the investors, thus promoting the Bank's image both domestically and internationally.

### SME and Corporate business line

At the SME and Corporate business line level, each division has at least one person with sustainability responsibilities. Thus, the structures in charge of product development, specialized sectors, coordination of the SME and micro customers area or mid-corporate customers have specific resources allocated to implement the strategic sustainability objectives.

In 2022, the Green and Sustainable Loans Department was established with objectives spanning all over corporate lending business lines, including large corporates, corporates and SMEs. Its main responsibilities include:

- Initiate and maintain collaboration with national and international authorities in the field of green finance.
- Proposing internal rules for lending to customers investing in green projects.
- Promotion of the products and services developed by the department.
- Creating programs and products dedicated to sustainability and organizing trainings for the employees.

- Identify customers and promote the financing alternatives for green projects.
- Participation in the development of Banca Transilvania Sustainability Strategy.
- Support the implementation of the Bank's Sustainability Strategy with the aim of increasing the green and healthy loan portfolio.

### Retail business line

The Retail Banking business line is responsible for the implementation of specific objectives in the area of retail products and services, including green or sustainable products and services, as well as for monitoring, implementing and reporting on the relevant regulations that are or will be in force, such as the EU Taxonomy.

### Large Corporate business line

The Large Corporate business line assumes the responsibilities to meet and manage the expectations of the most sophisticated clients' segment with complex financings, including ESG issues.

The Financial Reporting Service, reporting to the CFO, ensures the sustainability reporting and a dedicated Environmental and Social Risk Analysis structure, reporting to the Deputy CEO-CRO, manages the environmental and social risks and contributes to the Environmental Policy.

### Support functions in Banca Transilvania Departments

The Deputy CEO,CRO has under his coordination:

- A dedicated environmental and social risk analysis structure with the following responsibilities: developing the Environmental Policy, assessing the environmental and social risks associated with the financings under the clients credit risk analyses framework, monitoring the environmental and social incidents reported by the clients, and providing support and advice to colleagues on ESG issues.
- The non-financial risk management structure responsible for analyzing the trends and identifying the emerging risks caused by changes in market and macroeconomic conditions, including climate change risks.

The Senior Executive Director, Corporate Governance and Contencious coordinates a structure with specific responsibilities for non-financial reporting in accordance with the best practices and recognized standards.

Under the supervision of the Senior Executive Director, Human Resources, there are resources dedicated to sustainability issues, in particular those related to the Bank's employees. Whether it concerns staff training, maintaining a work climate aligned with the principles deriving from human rights (non-discrimination, equal opportunities) or capitalizing on the benefits generated by a diverse collective

structure, these resources contribute to the objectives of the business lines through initiatives to increase the commitment of colleagues, aimed to ensure professional and personal well-being.

The Executive Director, Marketing, Communication and PR also coordinates the BT Group's CSR activities, as well as the internal and external communication approach, including the ESG aspects.

Reporting to the Deputy CEO, COO, the Procurement Department is the structure that manages procurement activities, investments and logistics. In recent times, the department has had increasingly complex responsibilities for managing the environmental impact of the Bank's activities, including the manner in which BT Group's suppliers are selected and the determination of greenhouse gas emissions associated with Scope 1, 2 and 3 under the GHG Protocol. By incorporating ESG aspects into the procurement methodology and regulations, the external resources required for BT's activity are secured from suitable sources that meet the mentioned collaboration conditions, including ESG criteria. The various consumptions of the Bank and of its subsidiaries are monitored and measures are identified to make them more efficient, both to reduce costs and the negative environmental impact of the Bank's own activity.

The Deputy CEO, CFO supervises the Bank's reporting activity which contributes to reporting on sustainability issues such as EU Taxonomy, CRC, etc. by nominating persons who liaise constantly with the Sustainability Working Group, thus being up to date with the reporting requirements, standards and best practices.

At Bank level and covering the whole spectrum of activities, representatives of these structures form an internal working group coordinated by the Chief Executive Officer. Without becoming a formalized structure, the working group meets regularly to carry out the Bank's sustainability strategy and promotes good interdepartmental collaboration, shares knowledge, reviews initiatives and reports on progress on each strategic objective, either through the Sustainability Statement or internal reporting.

#### Sustainability governance in the Group's subsidiaries

Each BT Group subsidiary has designated a person responsible for the sustainability area. They meet regularly and liaise with the Bank's working group to align the implementation of sustainability initiatives and to ensure the coordination of sustainability activities and projects.

**BT Mic:** BT Mic follows the strategic pillars defined in the "BTFG Sustainability Strategy" and is currently developing its own ESG strategy. The highest body that will approve this strategy, as part of BT Mic's business strategy, is the GMS/BoD, with an annual strategic review. At the executive level, the Leaders Committee is responsible for implementing the objectives of the ESG strategy, through the departments involved and the designated person with responsibility in this area. It supports the model involving the prioritization of objectives resulting from consultation with the company's stakeholders (customers, employees, investors, shareholders, regulators), in parallel with the tracking of targets and performance indicators set at the level of BTFG.

**BT Capital Partners:** The management adopts the company's strategy which includes the integration of ESG principles, in line with BTFG policies and applicable regulations.

**BT Pensii:** Within BT Pensii, the executive management is responsible for the implementation of the sustainability strategy and an ESG officer has been appointed. Executive management is also able to set up specialized committees to deal with specific issues of high complexity in the day-to-day business activity.

**BT Direct:** The Annual General Meeting of Shareholders (GMS) is the authority that decides on BT Direct's business and ensures its Economic and Commercial Policy. At Board and Management level, it approves BT Direct's Sustainability Strategy and reviews the achievement of the performance indicators proposed in the BT Direct Sustainability Strategy 2022-2024. Since 2023, the company has appointed an ESG Officer, with the position of ESG Governance and Risk Specialist within the Control and Risk Management Division, to facilitate the company's adaptation and orientation process on sustainability, and in 2024, its Environmental Committee was established.

**BT Asset Management:** Information on BT Asset Management SAI's approach sustainability is available on the company's website, [here](#). Three of the funds managed by BT Asset Management fall under Article 8 SFDR ( EU Regulation 2088/2019).

**SALT:** The coordination of ESG initiatives and strategy is carried out at the level of Banca Transilvania, as parent company. Banca Transilvania realizes this consolidation by relying on collaboration and information provided. in accordance with BT Group's policies on group relations, policies approved and ratified by the Salt Bank's Board of Directors.

**OTP Bank Romania:** In 2024, OTP Bank Romania S.A. underwent a number of changes, both internally and in its relations with third parties, in line with the governance and sustainability strategy of OTP Bank Romania S.A. and Banca Transilvania Financial Group. Thus, the administrative, management and supervisory bodies of OTP Bank Romania have played and continue to play a crucial role in overseeing and guiding the Bank's business conduct in line with the overall strategy. The administrative bodies ensure that the Bank's operations are aligned with its mission, vision and values. They are responsible for setting strategic objectives, approving major business decisions and ensuring compliance with the regulatory requirements.

The governing bodies, including the Board of Directors, are responsible for managing the Bank's day-to-day operations, implementing the established strategies and policies, overseeing activities, managing risks and utilizing resources efficiently. They also ensure that banking activities are conducted ethically and in compliance with the applicable regulations. On the other hand, supervisory bodies, such as the Supervisory Board, have the role of monitoring management performance, ensuring transparency and accountability, and overseeing internal control systems, thereby ensuring that the bank acts in the best interests of its stakeholders.

These roles and responsibilities ensure that OTP Bank Romania S.A. maintains high standards of business conduct and operates in an ethical, transparent and accountable manner.

**Victoriabank:** The highest management body of the Bank is the Board of Directors of Victoriabank S.A. (BoD), which supervises and monitors the management decision-making process and is responsible for the Bank's business and financial soundness. The Board of Directors has the duties and responsibilities set out in the Regulations, the Bank's Articles of Association and the Board of Directors' Procedure Regulation. It therefore approves and monitors the implementation of the Bank's strategic objectives, of the priority business areas, the risk management strategy and the management framework. The Board of Directors approves the Bank's annual business plan, income and expenditure budget, and social and environmental policies, provided that performance standards are maintained in line with the Bank's long-term financial interests and capital requirements. The Board also regularly monitors and assesses the effectiveness of the Bank's corporate governance framework, including the Bank's governance principles, and takes appropriate action to address any deficiencies. The Board members adopt and review the general principles of the Remuneration Policy and are responsible for overseeing its implementation, including the approval of the total remuneration package for the Bank's employees.

**BT Leasing Moldova:** The CEO who is the company's single-person Executive Body is the authority that provides oversight of the impact management at the company level. The CEO acts in accordance with the provisions of the company's Internal Regulations as well as ensures the company's alignment with the implementation of sustainability policies, practices and initiatives valid at Group level.

**BCR Chisinau:** In order to outline an effective governance framework, in line with the principles set out in the BCR Chisinau Code of Ethics, the Executive Committee has the role of setting the company's main coordinates in order to avoid conflicts of interest and effectively manage the compliance risk. The Supervisory Board is responsible for approving BCR Chisinau's Code of Ethics. The Compliance Department is responsible for drafting, managing and implementing the Code of Ethics, as well as for maintaining other corporate culture regulations, which are regularly updated.

**OTP AM-** BT Asset Management S.A.I.'s Sustainability Risk Management Policy is available on the company's website and can be viewed [here Policies and Procedures | OTP Investment Funds](#). At the same time, one of BT Asset Management's funds falls under Article 8 SFDR (EU Regulation 2088/2018).

**BT Broker:** The Chief Executive Officer who is the company's sole executive body is the authority that provides oversight of the company's management. He/she acts in accordance with the provisions of the company's internal regulations, ensuring that the company is aligned with the implementation of sustainability policies, practices and initiatives valid at Group level, in compliance with the resolutions of the Board of Directors and of the General Meeting of Shareholders. For the time being there is no dedicated position for this function.

**BT Leasing Transilvania:** The Executive Officers who are the company's executive body are the authority providing oversight of the impact management at the company's level. Each director acts in accordance with the company's internal regulations and ensures that the company is aligned with the

implementation of the sustainability-related policies, practices and initiatives valid at Group level. At the time of reporting, in line with the ESG Policy adopted at the BTFG level, it has started the process to integrate the sustainability issues at the company's risk function level.

#### [DR GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies](#)

##### Informing the Governing Bodies on sustainability issues

The Group's governing bodies are informed on sustainability issues through:

- Regularly, through monthly/quarterly reports issued by the relevant departments, including key performance indicators (KPIs), risks and progresses achieved against sustainability objectives.
- Specialized sustainability reporting addressing specific topics such as material impacts, risks and opportunities, carried out in accordance with the applicable legislation, such as the CSRD Directive and the EU Taxonomy Regulation.
- Ad-hoc meetings for specific situations requiring immediate decisions and approvals.

The Group, through Banca Transilvania as leader of the Romanian financial-banking system, is aware of its role in the sustainable growth of the Romanian economy. Therefore, the Bank's business strategy integrates coherent sustainability objectives, monitored through key performance indicators in the following areas: economic performance, people and the natural environment. The objectives, formally defined in Banca Transilvania's Sustainability Strategy, define the actions and measures needed to address material impacts, risks and opportunities.

Impacts, risks and opportunities addressed by the Governing Bodies during the reporting period included the following:

- Sustainable finance and support for the green transition: expanding the offer of green and sustainable financial products by providing green loans to corporates and retail clients, as well as green bonds issues that help support the responsible entrepreneurship by financing and refinancing projects that enable the transition to a low-carbon and climate-resilient economy and/or create a positive impact on society and mitigate social problems. To support these, the Group has developed the Sustainable Finance Framework, a document that defines the green and social instruments that the Group can issue and the eligibility criteria for the financing it provides from its resources. The Sustainable Finance Framework provides a unified structure for the categorization and reporting of sustainable finance instruments.
- Climate change and environmental impacts: monitoring the financed emissions at Group level, as well as the environmental, physical climate and transition risks associated with the Bank's corporate lending portfolio.
- Employees and the community: ensuring fair labor practices such as adequate pay, occupational safety and health, training, diversity, equity and inclusion (DEI), and community involvement to increase financial literacy.



- Regulatory compliance: Adapting to the evolution of the EU sustainability reporting standards (CSRD and ESRS) and ensuring alignment with the reporting obligations, including the EU taxonomy and SFDR.

#### Develop the appropriate skills and expertise to oversee the sustainability issues

BT ensures the sustainability expertise of its governing bodies through several measures:

- Direct experience: Board of Directors members and the executive management team have structures in place that have specialists with relevant experience in managing environmental, social and governance issues, such as: specialists in climate risks, supply chain's sustainability, sustainable finance, human resources, etc.
- Access to external expertise: When additional expertise is needed, the governing bodies collaborate with external experts and leading industry organizations to obtain analysis and guidance on specific sustainability topics.
- Training and professional development: BT offers targeted training sessions on sustainability topics and encourages participation in external workshops, conferences and webinars to continuously improve the sustainability expertise of the governing bodies.
- Continuous assessment of the expertise needs: the Governance and Nomination Committees regularly assess the existing skills and expertise to ensure that they are appropriate to the company's needs. Where these are not available internally and cannot be created through training and professional development or by accessing external expertise, the company uses recruitment processes.

#### RD GOV-3 - Integration of sustainability-related performance in incentive schemes (remuneration)

##### Sustainability-related remuneration policies for administrative, management and supervisory bodies members

The performance of the governing bodies is linked to specific sustainability objectives or impacts, the achievement of which is reflected in the remuneration of their members. ESG objectives are rated on a scale of 1 to 5, influencing the decision on whether or not to award related variable remuneration.

The Bank implements remuneration mechanisms that are aligned with the European Banking Authority's Guidelines (EBA/GL/2021/04) on appropriate remuneration policies under Directive 2013/36/EU, ensuring a balance between fixed and variable remuneration.

The Board of Directors members' remuneration is fixed, with a basic component in RON and an additional component in shares. Shares vest after at least one year and are not linked to performance, promoting sound governance and risk management practices.

The annual performance of the Leaders' Committee members is assessed according to the SMART objectives methodology. These objectives include the achievement of the sustainability KPIs. Variable remuneration is split between immediate vesting remuneration and deferred remuneration, with a deferral period of 3-5 years for certain categories of beneficiaries and 5 years for C-suite level staff.

The variable remuneration in shares is adjusted for ex-ante and ex-post risks, in accordance with the remuneration policy approved by the General Meeting of Shareholders.

General performance criteria for eligibility for the award of shares or other variable remuneration include:

- Achievement of the gross profit target for the current and/or previous year.
- Maintain optimal liquidity in line with the risk appetite.
- Maintain an adequate level of solvency.
- Maintain the overall risk profile within the assumed limits.

BT's remuneration policy for Board members and C-suite level executives is based on accountability, incentive alignment and the stability of the Bank. It is approved by the Board of Directors with the endorsement of the Remuneration Committee.

#### [DR GOV-4 – Statement on due-dilligence](#)

<b>Basic elements of due diligence processes</b>	<b>Paragraph in the statement</b>
a) Integrating due diligence processes into governance, strategy and model	21, 110-111, 140-143, 145-146
b) Involvement of affected stakeholders at all key stages of due diligence processes	32-34, 143-145
c) Identification and assessment of negative impacts	44-48
d) Implementation of actions to address these negative impacts	72-73, 77, 100, 119-124
e) Monitoring the effectiveness of these efforts and communicating the results	9, 73-74, 95, 100, 115, 125

#### [DR GOV-5 - Risk management and internal controls over sustainability reporting](#)

##### [Risk management system and internal controls for the sustainability reporting process](#)

Banca Transilvania's risk management and internal control system for sustainability reporting includes the following main components

- Governance and oversight: the Board of Directors, supported by dedicated sustainability and risk management structures (mainly the ESG Committee) are responsible for ensuring that sustainability risks are identified and appropriately managed in the reporting process.

- Policies, procedures and methodologies: underpin sustainability reporting and are regularly reviewed and updated to align with the evolving regulatory requirements (e.g. EU Taxonomy).
- Data collection and verification: at Bank level, the departments involved in the sustainability reporting process coordinate the process of data collection and verification at the level of each subsidiary in the Group.
- Internal audit: the internal audit department ensures that adequate internal control mechanisms are in place, including those regarding the sustainability reporting process, by verifying data compliance, traceability of sources and compliance with the internal procedures for the validation of reported information.

#### Main risks identified, their assessment and control measures

Category	Description	Probability	Impact	Control measures
Data accuracy	Incorrect, incomplete or inconsistent data; lack of traceability	Low	High	Clear data collection and validation procedures; internal audit
Definition of indicators	Unclear methodologies, uneven application of standards	Low	Medium	Internal standardization and training for the teams involved
Quality of IT systems	Poor IT systems, lack of integration between data sources	Medium	Medium	Investments in integrated systems and ESG digitization
Governance and responsibility	Unclear responsibilities, lack of clear internal control	Medium	High	Clarification of roles and responsibilities; oversight by AC
Legal non-compliance	Non compliance with ESRS, CSRD, taxonomy, SFDR	Low	High	Legal monitoring, regular update of the reporting framework
Non up to date information	Reporting on historical data because of reporting lag between entities.	Medium	Medium	Recurrent review process of the ESG content and policies

#### Integration of findings into internal functions

Findings resulting from the risk assessment of the sustainability reporting process, as well as from internal control activities, are directly integrated into relevant Group functions and processes. These include improving ESG data collection and validation procedures, adjusting internal reporting policies and updating the methodological manuals such as:

- Double analysis methodology.
- Calculation of carbon footprint and emissions.
- Indicators reporting methodology according to EU Taxonomy.
- Methodology for calculating the gender pay gap.

The Divisions involved work together to translate the findings into corrective measures, which are implemented and followed up through agreed action plans.

The results of the assessments and internal controls on the sustainability reporting process are regularly reported by the Internal Audit function to the Audit Committee.

### 1.3. The strategy and business model

#### DR SBM-1 - Strategy, business model and value chain

The Banca Transilvania Financial Group is present in 3 countries, the most significant activity being in Romania with over 97% of total assets. The other two countries in which the Group operates are the Republic of Moldova, where the BT Group, through its subsidiaries, offers banking and financial leasing services, and Italy (through a bank branch opened in Rome)

Details of the types of services and products offered, as well as the markets and types of customers can be found at the end of the document in Annex 4

Banca Transilvania/ Active customers	2023	2024	Evolution 2024 vs. 2023
Retail	3,785,742	4,088,119	+8,0%
Micro Business	415,679	448,472	+7,9%
SME	25,358	25,002	-1,4%
MidCo	11,197	8,761	-21,8
LargeCo	1,517	1,509	-0,5%
<b>Total</b>	<b>4,239,493</b>	<b>4,571,863</b>	<b>+7,8%</b>

**Note:** The classification of legal entities into segments is governed by internal rules that define the conditions for the classification of customers into business segments.

Banca Transilvania	2023	2024	Evoluție 2024 vs 2023
Network	511	513	+0,3%
ATMs	18,65	1,937	+3,8%
POS	126,153	148,000	+17,3%
MFM	616	651	+5,6%
Cards	6,000,000	7,000,000	+16,6%
Digital channel unique users	3,700,000	4,400,000	+18,9%

- Banca Transilvania is the market leader in cards, with 7 million cards in its portfolio, of which 700,000 are credit cards. Purchases made with the 7 million cards increased by 23% compared to the same period last year.

- In 2024, the strong customer acquisition rate was maintained, with 530,000 people becoming BT customers, some of whom chose to open their account directly through the BT Pay app, without visiting a bank.
- BT has more than 4.4 million digitized unique customers. These customers use at least one of the bank's digital solutions. We see a clear trend of growing interest in digitization, with customers increasingly preferring innovative solutions that allow them to easily and efficiently manage their financial services in a digital environment such as virtual cards, loans, insurance and investment products.
- The bank reached more than 4.5 million unique cards in BT Pay, Apple Pay, Google Pay, Fitbit Pay and Garmin Pay wallets, and the number of phone payments increased 36% to 248 million in 2024 compared to 2023. At the same time, BT Pay money transfers are also growing in popularity, with volumes up 54% year on year.
- In terms of the volume of non-card transactions carried out by retail customers through digital channels, they were up 20% compared to the same period last year.
- As of December 31, 2024, the Bank has a network of 1,937 ATMs, of which 651 are multifunctional machines. The Bank also owns 502 BT Express terminals which are used for various operations other than cash dispensing and has over 148,000 POS installed, 30,000 STAR partner locations and works with over 7,100 merchants using e-commerce solutions.
- Compared to the previous year, interactions in the BT Visual Help app. increased by 15%. BT Visual Help is the digital platform through which customers who call the Call Center team are guided to a digital self-service area, where they can access account, card and transaction information and perform several card-specific actions using their phone. Interactions on the platform exceeded 4 million hits in 2024.
- Since October 2023, BT has implemented a fast and secure method of customer authentication via BT Pay in the contact center. To date, there have been 1.2 million authentications using this method, providing a digitized experience and reducing the time it takes to resolve queries.

## BT MIC

BT Microfinance (BT Mic) is a non-bank financial institution, established in 2016 and dedicated to financing small businesses, including start-ups, which complements Banca Transilvania's role in supporting and providing access to finance to Romanian entrepreneurs. It targets entrepreneurs with a turnover of up to RON 1 million, irrespective of the field of activity and form of organization: commercial companies, authorized individuals, family businesses/partnerships, sole proprietorships, self-employed, individuals carrying out economic activities. Through BT Mic, the approach to customers is individual and personalized, with the aim of understanding each business and agreeing on a financing structure that will ensure its development in a sustainable way.

By focusing on inclusion and entrepreneurial development, BT Mic can access underserved markets, stimulating economic growth and innovation. Supporting existing (or aspiring) entrepreneurs, startups and micro businesses, and can lead to a more inclusive financial ecosystem

## BT Mic active customers

### Micro-enterprises

- 2023: 18,329
- 2024: 22,160

Evolution 2024 vs. 2023: growth >20%

Our core mission remains to promote inclusion and entrepreneurship. We aim to be the leading funder of the entrepreneurial community. This multi-faceted approach to our goals includes a commitment to addressing challenges while preparing for long-term strategic developments.

### BT Leasing

BT Leasing Transilvania IFN S.A. offers lease financing for a wide range of vehicles, production and other equipment and real estate.

In May 2024, the acquisition of Avant Leasing's portfolio was completed and in December 2024, the merger by which BT Leasing absorbed OTP Leasing became effective, thus consolidating the leasing activity within the BT Group.

<b>BTL/Active customers</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Retail	584	555	-5%
Micro business	21,353	31,629	48%
SMEs	3,406	7,792	129%
MidCo	807	1,950	142%
LargeCo	45	109	142%
<b>Total</b>	<b>26,195</b>	<b>42,035</b>	<b>60%</b>

### BT Asset Management

BT Asset Management S.A.I. is a specialized investment management company, member of the Banca Transilvania Financial Group. Management is carried out for open-end investment funds and alternative investment funds, with investments in a wide range of financial instruments (equities, bonds, government securities, deposits, etc.). Access to the capital market is offered to clients through investments in Romania, Europe and the USA, through investments in RON, EUR, USD and GBP.

<b>BTAM/Active Customers</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Retail	146,345	251,577	+71,90%
Corporate	1,219	1,459	+ 19,68%
Total	147,564	253,036	+ 71,47%

## BT Pensii

BT Pensii Societate de Administrare a Fondurilor de Pensii Facultative S.A. is the optional pension fund management company within the Banca Transilvania Financial Group, managing the optional pension fund „Pensia Mea”.

<b>BT Pensii</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
No. of participants	51,495	95,839	+ 86,11%
Asset Value(RON)	217,886,8596.7	290,469,079.41	+33,31%

## BT Capital Partners

BT Capital Partners provides brokerage services, assistance with IPOs and investor acquisition, mergers and acquisitions consulting, complex financing sourcing and structuring, market research and strategic consulting.

<b>BTCP/Active Customers</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Retail	26,623	34,667	+130,21%
Corporate	466	527	+113,09%
Total	27,089	35,194	+129,92%

## BT Direct

BT Direct IFN S.A. is a non-banking financial institution, member of the BT Group, offering a wide range of financial products in the field of in-store, online and personal loans, with the objective of becoming the preferred institution of Romanians through quality, modern services and convenient financing solutions offered to customers, through the development of sustainable partnerships

<b>BTD*/Active Customers</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Individual Customers	208.323	227.057	+ 8.99%

\* active customers with operations in the last 6 months, as of 31 December

## Salt Bank

Salt Bank S.A. is active in the financial-banking sector (other monetary intermediation activities). Salt Bank is the first neo-bank "made in Romania" that aimed to bring a unique digital experience to banking users. Thus, in March 2024, the Salt Bank mobile application was launched (on Android and iOS), which contributed to the growth of the Bank's portfolio to over 380 thousand customers by the end of 2024. The Bank continues its app development program also in 2025 with new digital functionalities and benefits for its customers, while maintaining human contact with them through the dedicated Care Center.

Active customers	2023* (Idea Bank)	2024 (Salt Bank)
Retail	15,888	393,261
Micro Business	7,024	24
SME	8,984	7
MidCo	1,577	2
LareCo	130	2
Total	33,603	393,296

\*at 2023 level, the portfolio shown is the one taken over from Idea Bank following the acquisition of this entity in 2021 by Banca Transilvania Financial Group. Salt Bank (formerly Idea Bank) brand was launched in April 2024

## Avant Leasing

In accordance with the Group's decision, Avant Leasing ceased its new business activities as of June 30, 2023. In May 2024, Avant Leasing completed the sale of its performing portfolio to BT Leasing. Avant Leasing currently continues to manage its non-performing loan (NPL) portfolio, which is scheduled to be sold to a third party by September 30, 2024. In addition, Avant Leasing retains a portfolio of contracts that are nearing the end of their lease terms, as well as credit contracts for which it is in the process of obtaining customer consent for transfer to BT Leasing.

## Victoria Bank

Established on December 26, 1990 B.C. Victoriabank S.A. was the first Commercial Bank registered in the Republic of Moldova.

Victoriabank is the third largest bank in Moldova by assets. Since 2018, the bank is part of the largest financial group in Romania - Banca Transilvania. With over 1000 employees, around 270,000 active customers, 76 branches in more than 30 localities in the country, the bank finances approximately 31,000 individuals and companies. Thus, Victoriabank remains a reliable financial institution, dedicated to meeting customer needs and supporting the economic development of the Republic of Moldova.



Through its extensive experience and commitment to innovation, Victoriabank continues to build the road to success and bring prosperity to the lives of people and businesses

<b>Active customers</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Retail	298,262	320,610	+22,348 (+7,4%)
SME	11,778	12,841	+1,063 (+9%)
MidCo	324	348	+24 (+7,4%)
<b>Total</b>	<b>310,364</b>	<b>333,799</b>	<b>+23,435 (+7,5%)</b>

<b>Victoriabank</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Network	68	63	-5 (-7,3%)
ATMs	225	252	+27 (+12%)
POS	8.056	9,064	+1,008 (+12,5%)
Cards	428,147	527,501	+99,354 (+23%)
Network retailers	4,424	5,082	+658 (+14,8%)

#### BCR Chisinau Moldova

Banca Comercială Română Chisinau S.A. (BCR Chisinau S.A.) is a universal bank, with a strategic focus on corporate clients, their employees and partners. BCR Chişinău started its activity on October 22, 1998, being one of the first foreign-owned banks present in the Republic of Moldova at that time.

BCR Chisinau became a subsidiary of BC Victoriabank S.A. as of January 15, 2024, by acquiring 100% of the shares. Banca Comercială Română Chisinau S.A. is to be reorganized by merger following the absorption of BCR Chisinau S.A. by BC Victoriabank S.A.

The purpose of the merger is to maximize efficiency by unifying the two banks and streamlining the structure of BC Victoriabank S.A., consolidate operations and manage their resources and assets more efficiently, strengthen the loan and deposit portfolio, and strengthen the market position.

<b>Active customers</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Reatil	11,029	7,341	-33,43%
Micro	1,270	973	-23,38%
SMEs	133	100	-33%
Corporate	81	65	-19,75%
<b>Total</b>	<b>12,513</b>	<b>8,479</b>	<b>-32,2%</b>

<b>BCR Chișinău</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Network	4	2	-50%
ATM	16	11	-31,25%
Nr. Pos-uri	0	0	0
Carduri business PJ	192	142	-26%
Carduri PF	11,280	7.415	-34,2%
Comercianți în rețea	0	0	0

## BT Leasing Moldova

BT Leasing Moldova, the first company of the Banca Transilvania Financial Group opened in the Republic of Moldova, has been firmly maintaining for 8 consecutive years the position of market leader in terms of the size of its financing portfolio, according to official statistics. The company's main activity is to carry out financial leasing operations for various movable assets and aims to be the reliable partner for local entrepreneurs, building a range of products and services dedicated primarily to them. The BT Leasing Moldova portfolio includes financial leasing solutions for vehicles, industrial equipment and machinery, addressing the diverse needs of its customers. With a flexible offer, the company facilitates the acquisition of fixed assets, new or second-hand, on financing terms tailored to customers' needs, offering competitive interest rates in mdl or euro

Thus, BT Leasing Moldova is constantly reaffirming its commitment to be a reliable partner for the sustainable development of the local business environment, including through green financing initiatives, aiming to combine financial performance with positive impact on the community and the environment

<b>BTLM/Active Customers</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Retail	994	782	-21,33%
SMEs	261	260	-0,38%
Micro business	352	397	+12,78%
MidCo	81	53	-34,57%
<b>Total</b>	<b>1,688</b>	<b>1,492</b>	<b>-11,61%</b>

## OTP Bank Romania

OTP Bank România S.A. started its activity in Romania through the acquisition of RoBank in 2004 and operated as a subsidiary of the Hungarian financial group OTP Group, present in 15 countries. Offering comprehensive financial solutions in both the retail and corporate segments, OTP Bank Romania has steadily expanded its presence and services, becoming one of the top 10 banks in the country.

In 2024, after four years of considerable growth across all business lines, with more than 300,000 active customers, 95 locations, and over 1400 employees OTP Bank Romania moved towards a process of portfolio and operational consolidation. With a team that embraces change and harnesses its potential, the bank has built a culture of trust at every level of the organization.

As of 30.07.2024 OTP Bank Romania and the subsidiaries OTP Consulting, OTP Leasing, OTP Asset Management, OTP Factoring, OTP Advisors and OTP Bank Romania Foundation have become part of the

Banca Transilvania Financial Group, the OTP brand in Romania being used under a temporary license as of this date.

<b>OTP Bank Romania</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs 2023</b>
Network	96	95	-1 (Closure of Ag.Palas Iasi 24.05.2024)
ATMs	157	146	-11 (-7%)
Total Terminals	17,921	23,360	5,439 (+30,3%)
Total physical POS	10,431	14,701	4,270 (+40,9%)
Total SOFTPOS	4,156	4,715	559 (+13,45%)
Tranzit terminals	3,120	3,770	650 (+20,8%)
E- Commerce Terminals	214	174	-40 (+18,69%)
Cards	388,233	340,719	-4,7514 (-12,23%)
Unique users digital channels enrollments via Google and Apple digital channels	63,333	134,495	71,162 (+112,3%)
MFM*	n/a	n/a	n/a

<b>OTP Bank Romania</b>	<b>2023</b>	<b>2024</b>	<b>Evolution 2024 vs. 2023</b>
Retail	296,750	281133	-15,617 (-5,26%)
Micro	17,364	16669	-695 (-4%)
Commercial	3,556	3225	-331 (-9,3%)
LargeCo	1,159	1105	-54 (-4,65%)

#### BT Broker

BT Broker's core business is the insurance of leases financed by BT Leasing. At the same time, BT Broker manages the entire portfolio of policies issued on the financed assets for the entire term of the lease. BT Broker's activities also include the development of a direct sales channel. We approach leasing customers who have concluded their contract with BT Leasing and try to approach other sales channels. We have a portfolio of contracts in this area that we manage. On 03.12.2024 we took over the insurance portfolio of OTP Leasing, an action that took place in parallel with the action of BT Leasing to take over the portfolio of leasing contracts of OTP Leasing.

<b>BT Broker/ Active customers/ 31.12.2024</b>	<b>2023</b>	<b>2024</b>	<b>Evoluție 2024 vs. 2023</b>
Retail	877	879	2 (+0,2%)
Corporate	35,398	41,436	6,038 (+17%)
<b>Total</b>	<b>36,275</b>	<b>42,315</b>	<b>6,040(+16,65% )</b>

## Overall Strategy and Sustainability Objectives

Our overall strategy reflects a strong commitment to integrating sustainability into all aspects of our business. It is geared towards reducing environmental impacts, supporting employee development and delivering sustainable products and services that meet customer and stakeholder expectations. Within our strategy, we focus on three main pillars - Performance, People and Environment - and on setting clear, measurable targets to support the achievement of these commitments.

The Bank's ESG strategy aims to integrate sustainability into the business model through specific policies and measures. This includes formulating and implementing a strategy that is in line with the Bank's values, managing ESG risks and developing sustainable financial products such as green finance and sustainable bonds. It also establishes a clear monitoring framework through KPIs and alignment with international standards. Promoting a responsible organizational culture, supported by training, ethics and diversity programmes, is essential. The Bank maintains an active dialog with stakeholders - investors, customers and partners - to adapt the ESG strategy to their expectations, while ensuring transparency and regulatory compliance. The implementation of the strategy is overseen by the ESG Committee, which approves and monitors the measures taken, ensuring reporting to management and proper archiving of documentation. These initiatives reinforce the Bank's commitment to sustainability and corporate responsibility.

In the case of the subsidiaries, TDBFG's ESG Policy is in the process of being implemented, with internal structures already in place at both workforce and management level, as detailed in the relevant sections

Our sustainability goals

#### Pillar: Performance

Our product, service and customer targets are key to integrating sustainability into our core business

- **RON 3.5 billion:** The production of green loans granted to companies, validated according to the CAFI methodology/ Target: 2024-2025.
- **Minimum 30%:** Proportion of electric and hybrid vehicles in the leasing portfolio/Target: Annually, starting with 2024
- **Minimum 85%:** Rate of digitized customers out of total customers to encourage use of digital channels/Target: Annual
- **Minimum 20%:** Green mortgage production out of total annual production/Target: Annual
- **Minimum 95%:** Data protection training completion rate/Target: Annual

#### Pillar: People

In relation to our employees, our objectives reflect our commitment to continuous development and the integration of sustainability into our business model

- **Minimum 50%:** Employee participation rate in eNPS./Target: Annual
- **Minimum 40h:** Average number of training hours per GFBT employee
- **Reduce the gender pay gap** in the company. Target: Annual

#### Pillar: Environment

We aim to reduce the environmental impact of how we operate by doing the following:

- **Minimum 85%:** Proportion of renewable energy in the total energy consumption of BTFG companies. Target: Annual
- Reducing emissions from own activity (Scope 1, Scope 2 and Scope 3 - relevant categories other than financed emissions): Continuous reduction, with a target date of 2026

Assessing products, services and current markets

Our products and services have been assessed against sustainability objectives, highlighting priorities such as:

- Sustainable financial products (green loans, green mortgages) to reduce environmental impacts.
- Target markets include companies and individuals, with a focus on segments with the potential to adopt sustainable solutions (high emission industries, customers interested in electric and hybrid vehicles)

## Strategic elements and main challenges

Our strategy includes key initiatives and projects to support our sustainability goals:

- Develop a climate transition plan for direct, indirect and financed emission reductions based on climate scenario analysis and decarbonization targets.
- Continue education and awareness programmes for customers and employees, focusing on green finance, energy efficiency and climate risk management.
- Increased collaboration with strategic partners (local authorities, business associations, NGOs) to promote sustainability.

## Main challenges

- Adapting to a changing legislative landscape requires flexibility and updating internal processes.
- Integrate sustainability principles into the business model without compromising economic efficiency.
- Balancing the diverse requirements of stakeholders (authorities, investors, employees, communities) to align with sustainability objectives.

## Resources Critical to our work

- Network of branches and agencies: Connect directly with customers, offering personalized services.
- Technological infrastructure: digitization of processes and services for operational efficiency and reduced environmental impact.
- Operational mobility: The fleet supports the territorial activities.
- Human Capital: Employees vital to success, with a focus on professional development and sustainable organizational culture.
- Supplier relationships: partners who share our values of accountability and regulatory compliance.

## Generated Value

- Clients: innovative financial products (green loans, sustainable leasing, digital solutions).
- Investors: Transparency and solid performance, ESG alignment.
- Communities: educational initiatives, responsible funding, strategic partnerships.

## Position in the value chain

- Upstream value chain: Managing resources and supplier relationships to support operational infrastructure.
- Downstream value chain: strategic partner for retail (individual clients), non-retail (micro, SME, large corporates) and additional segments (leasing, asset management, pension funds, brokerage, consulting)

Our central position in the value chain allows us to connect economic actors, facilitating the transition to a sustainable economy and responding to today's economic challenges

### DR SBM-2 – Views, interests and expectations of stakeholders

For Banca Transilvania Financial Group, stakeholders are persons or groups of persons whose interests are influenced or could be influenced by the organization's activities.

Stakeholders Category	Involvement Method	Involvement Frequency	Communication method	Addressing consultation results
BTFG employee	BT Employee Experience Index (BT EEI)	Permanent	BT Con(vention), the festival dedicated to employees	Developing and updating policies that support work-life balance, increasing training opportunities and improving digital work infrastructure.
	Various internal competitions		Intranet	
	Employee Net Promoter Score (eNPS)		Sustainability Report	
	Consultation as part of the sustainability reporting			
Customers - Retail and Corporate	Net Promoter Score (NPS)	Permanent	Social media	Introducing new functionalities in banking applications, simplifying lending processes and providing educational tools for managing finances Educational events in sustainable finance.
	<a href="#">Intreb BT</a> platform		<a href="#">BT Talks</a> Podcast <a href="#">VB Talks</a> <a href="#">Blogul BT</a> E-mail	
	Meetings			
	Conferences		Newsletters	
	Consultation as part of the sustainability reporting "Contact" section on the website		Sustainability report	
Shareholder	Meetings	Quarterly On demand	General Meeting of Shareholders	Align with the new sustainability reporting standards, increase transparency and present detailed financial performance information in quarterly meetings (video conferences).
	Conferences		Video-Conference calls available on the website	
	Access to information on the website	Roadshows		
	Consultation as part of the sustainability reporting	Regular information reports and financial results		
		Newsletters		
		Administrators' report News in focus		
		<a href="#">Dedicated page</a> on the website		
Government Regulatory Authority	Various consultations	Occasional and on demand	Financial reports	Integrate regulation into the Bank's sustainability policy and support public initiatives on the transition to a greener and inclusive economy.
	Meetings		Sustainability Report	
	Consultation as part of the sustainability reporting		E-mail	
Financial institution	Meetings	Occasional	Financial reports	Participation in joint initiatives and implementation of funding schemes with European support. Working with
	Various consultations		Sustainability Report	



	Consultation as part of the sustainability reporting		E-mail	international institutions to attract funding for projects supporting the transition to a green economy
Investor/ Analyst	Various consultations	Annual	Video Conference calls available on the website	Publishing detailed reports on financial and sustainability performance, organizing and participating in dedicated events (e.g. Investors Days) and extending sustainability commitments in the product portfolio.
	Meetings	Occasional	Roadshows and presentations	
	Consultation as part of the sustainability reporting	Quarterly	Regular information reports and financial results	
			Newsletters	
			Administrator's report Sustainability Report <a href="#">website</a>	
Provider	Meetings	Occasional	Sustainability Report E-mail	Increasing transparency in commercial relations, reducing emissions in the supply chain and helping suppliers to adopt sustainable practices.
	Consultation as part of the sustainability reporting			
Business partners	Meetings	Occasional	Sustainability Report E-mail	Develop sustainable partnerships and improve transparency in commercial relations.
	Consultation as part of the sustainability reporting			
NGOs	Projects developed in partnership	Occasional	Sustainability Report E-mail	Implement financial education programmes and finance projects that support local development.
	Consultation as part of the sustainability reporting			
Profile associations	Meetings	Occasional	Sustainability Report Financial reports	Support the adoption of common standards for sustainability in the financial sector, promote financial education and inclusion.
	Consultation as part of the sustainability reporting		E-mail	

## Communication with investors

Tele/video conferences with investors are organized annually, according to the financial calendar published on the Bucharest Stock Exchange website at the beginning of each calendar year. The following table presents the dates of these conferences, as well as the theme of each of them:

Annual videoconferences organized by BT	Date	Event
Financial Results 2023, Videoconference	28.02.2024	Online
Financial Results Q1 2024, Videoconference	13.05.2024	Online
Financial Results H1 2024, Videoconference	21.08.2024	Online
Financial Results Q3 2024, Videoconference	11.11.2024	Online

## Net Promoter Score - NPS

The bank prioritizes customer satisfaction as measured by NPS and Human Interaction (HI). In 2024, NPS was 82.45 and HI was 98.24, based on more than 107,000 responses. Although NPS declined slightly, human interactions outperformed digital interactions. Improvements such as reception and online solutions increased satisfaction, and the feedback process turned 72% of passive customers into promoters.

### [Integrating stakeholder interests into the strategy and business model](#)

Banca Transilvania Financial Group's strategy and business model integrates sustainability into all aspects of its activities, focusing on digitalization, the transition to a green economy and reducing environmental impact. Customer support is achieved through digitalization, accessibility, efficiency and the expansion of the sustainable product portfolio.

Continued efforts for the bank's customers promote accessibility and efficiency through innovative solutions (mobile apps, online services) and expand the product portfolio to include green loans and financing for sustainable projects.

Employees are key, with initiatives dedicated to professional development and creating a fair working environment. Training programmes include ESG aspects, and measures to reduce pay discrepancies and increase employee engagement are constant priorities.

The Group is committed to reducing its environmental impact, using renewable energy and cutting emissions. Although a comprehensive climate transition plan is yet to be developed, the current commitments reflect the clear direction of the organization.

By integrating these objectives, the Group is consolidating its position as a responsible leader in the financial market, continuously adjusting its business model to respond to economic, social and environmental challenges:

- Accelerated digitalization efforts, the development of sustainable financial products and increased transparency in ESG reporting will strengthen stakeholder confidence and satisfaction.
- Customers will have easier access to modern and sustainable financial services, increasing loyalty and engagement. Professional development initiatives and the promotion of a fair work environment will increase employee engagement.
- ESG alignment and increased transparency will strengthen investors' perception of the Group as a responsible leader in the financial sector. Working with authorities and institutional partners will facilitate constructive dialogue and strengthen the organization's position.

Requiring additional sustainability data can create challenges for customers. The Bank has initiated dedicated programs, including conferences and education events, to inform and guide customers in adapting to the new requirements

BoD and LC members are regularly informed about stakeholder interests and perceptions of the organization's sustainability impacts. This information is collected through structured processes and communicated through several mechanisms including regular reports, strategy meetings, ESG committee and direct dialog.

### DR SBM-3 – Interaction of impacts and the undertaking's strategy and business model

The analysis of the company's material risks and opportunities was based on the professional judgment of our experts without the use of scenario-based models. The assessment was qualitative without detailed projections of cash flows, assets or liabilities. The Group intends to develop a scenario-based analysis with detailed projections in the next reporting cycle.

The Group's business and sustainability strategies are designed to ensure resilience and capitalize on opportunities, including sustainability opportunities. The sustainability strategy for 2024-2026 includes clear portfolio, people and environment-focused objectives, reflecting the Group's commitment to embed sustainability into operations. In parallel, the business strategy integrates ESG risks into the risk management system to strengthen the resilience of the business model

As this is the first year of reporting under the ESRS, there are no changes in material impacts, risks or opportunities compared to previous periods.

Starting with the next reporting cycle, we will include information on any changes to these elements to ensure transparency and continuity in the analysis and reporting of material impacts, risks and opportunities.

The impacts, risks and opportunities associated with the specific themes (Sustainable Finance and Entrepreneurship and Financial Literacy) are presented using proprietary indicators.

## List of material impacts, risks and opportunities

Theme/ Sub-theme/Sub-sub-theme	Material impact description	Type of impact	Where the impact appears	Time horizon	How it affects/could affect people or the environment	Derived from the strategy and business model
E1: Adapting to climate change	Financing climate change adaptation projects	Positive, Potential	Down	Short Medium Long	It helps protect the communities from the immediate risks of extreme events, supports job creation in sustainable sectors and improves quality of life by developing long-term resilient communities.  It supports the conservation and restoration of ecosystems, reduces impacts on biodiversity and natural resources and contributes to stabilizing the environment through sustainable climate change adaptation measures.	Yes, the company has targets to increase the share of green loans
E1: Climate change mitigation	Financing the sub-sectors of mixed farming, wholesale trade in agricultural machinery, equipment and supplies, pig farming, cultivation of cereals (except rice), crops and oilseeds, purchase and sale of own real estate, development of construction projects, meat processing and preservation, sale of cars and light motorized vehicles, retail sale of automotive fuels in specialized stores and offering products in the form of mortgage loans.	Negative, Current	Down	Medium Long	Financing these activities, while supporting economic development and diversification of the agricultural and industrial sectors, can have a negative impact on local communities and consumers through increased air pollution and deterioration of public health. High greenhouse gas emissions exacerbate climate change, increase the frequency of extreme events that affect human safety and well-being.  The financed activities contribute to increased greenhouse gas emissions through the use of agricultural machinery, transportation, production processes and the heating of the buildings, thus accelerating global warming. This leads to the degradation of ecosystems, loss of biodiversity and destabilization of natural cycles, with long-lasting effects on the ecological balance.	Yes, the company has in its portfolio loans granted to companies active in these sectors
E1: Climate change mitigation	Scope 2 and Scope 3 greenhouse gas (GHG) emissions as well as through air pollution generated by the Bank's direct activities. The consumption of electricity, heat and the use of vehicles for transportation contribute to the carbon footprint and air pollution, negatively affecting the quality of the environment.	Negative, Current	Upstream, Own operations	Long	Greenhouse gas emissions and air pollution from the Group's activities can affect the health of local communities by increasing the incidence of respiratory and cardiovascular diseases. In addition, contributing to climate change can amplify the risks of extreme weather events, indirectly affecting safety and quality of life.  Energy consumption and the use of vehicles for transportation all contribute to an increasing carbon footprint and degraded air quality. In the long term, these activities intensify climate change, affecting biodiversity, ecosystem stability and essential natural resources.	Yes, the company generates emissions at the operational and supply chain level (through its business model).
E1: Energy	The use of non-renewable energy sources and lack of measures to reduce energy consumption in own operations, including data	Negative, Current	Own transactions	Short, Medium	Increased operational costs and indirectly higher prices for consumers. In addition, the pollution generated by the production and consumption of these energy sources can affect the health of local communities through increased levels of air pollutants.	Yes, the company's business model involves energy consumption (headquarters, agencies, fleet).

	centers, lighting and office equipment.				Reliance on non-renewable energy sources increases greenhouse gas emissions and contributes to natural resource depletion. This exacerbates climate change, damaging ecosystems and affecting biodiversity, while the lack of measures to reduce energy consumption accelerates environmental degradation.	
E1: Energy	Financing renewable energy projects	Positive, Current	Down	All time horizons	It contributes to wider access to clean and sustainable energy sources, reducing dependence on fossil fuels and lowering long-term energy costs. It also creates jobs in innovative sectors and improves quality of life by reducing air pollution. Investments in renewable energy reduce greenhouse gas emissions, helping to combat climate change. These projects protect ecosystems by reducing the negative impacts of conventional energy sources and promote the sustainable use of natural resources.	Yes, the company has renewable energy project financings in its portfolio
E1: Energy	Financing energy-intensive sectors such as the sub-sector of refractory manufacturing	Negative, Current	Down	All time horizons	Financing (...) increases greenhouse gas emissions and air pollution, affecting the health of communities by increasing the risk of respiratory and cardiovascular diseases. Also, the economic costs of climate change impacts can affect the financial stability of households and communities. The activities of energy-intensive sectors contribute to an increasing carbon footprint, accelerating climate change and environmental degradation. High consumption of non-renewable resources and generation of industrial waste damage ecosystems, reduce biodiversity and destabilize long-term natural environmental cycles.	Yes, the company has energy-intensive financings in its portfolio
S1: Secure jobs	Creating secure and attractive jobs, underpinned by diversity and competitive wages, providing employees with a decent living and supporting the economic stability of local communities.	Positive, Potential	Own operations	Short	The creation of secure and well-paid jobs improves the quality of life of employees, providing them with a decent living and opportunities for professional development. Diversity and inclusion in the workplace promotes social cohesion, and the economic stability generated supports the prosperity of local communities.	Yes, through human resources policies
S1: Collective bargaining, including the proportion of employees covered by collective labor agreements	Positive impact on employees: a collective labor agreement exists at the level of BTFG, setting out working conditions, rights and obligations.	Positive, Current	Own operations	Short Long	Collective negotiations and the existence of a collective labor agreement ensure fair working conditions and clear rights for employees, promoting a healthy and stable relationship between employers and employees. It helps to increase job satisfaction and reduce industrial disputes, supporting the well-being and economic stability of employees in the short and long term.	Yes, through human resources policies
S1: Health and safety	Ensuring access to necessary health services, providing a benefits' package that gives stability and security in staff health. This contributes to the	Positive, Potential	Own operations	Short	Offering a benefits package that includes access to necessary medical services supports the health and well-being of staff by reducing the stress of potential medical costs. This promotes employees' stability and security, contributing to increased productivity and job satisfaction.	Yes, through human resources policies

	long-term well being currently felt by the employees					
S1: Gender equality and equal pay for work of equal value work of equal value	Provide a fair, equitable and transparent remuneration system for all employees, regardless of gender or other similar characteristics.	Positive, Current	Own operations	Short Medium	Providing a fair and transparent remuneration system promotes gender equality and reduces workplace discrimination. It improves the employees morale, increases job satisfaction and contributes to building an inclusive and respectful working environment that supports social cohesion.	Yes, through human resources policies
S1: Training and skills development	Through its training and career development programs, BTFG contributes to the improvement of employees' skills and professional advancement.	Positive, Current	Own operations	Short Medium	Training and development programs improve employees' skills, increase their confidence in their abilities and provide opportunities for career advancement. These initiatives contribute to job satisfaction and staff retention, supporting personal and professional development in the short and medium term.	Yes, through human resources policies
S1: Employment and inclusion of people with disabilities	Creating an inclusive working environment for people with disabilities.	Positive, Current	Own operations	Short Medium	Creating an inclusive work environment for people with disabilities promotes equal opportunities, reduction of discrimination and social integration. It contributes to improving the quality of life of these people, providing them with economic stability and opportunities for personal and professional development.	Yes, through human resources policies
S1: Measures against workplace violence and harassment	A work environment that promotes non-discrimination and appropriate behaviour at work with beneficial effects on the organizational climate and the well-being and mental health of employees.	Positive, Current	Own operations	Short Lung	Implementing measures against workplace violence and harassment creates a safe and respectful environment that promotes employees well-being, mental health and satisfaction. Such measures help reduce stress, increase productivity and build trust between employees and employer in the short and long term.	Yes, through human resources policies
S1: Diversity	Promoting diversity among employees, including cultural, gender or ethnic diversity, can enhance innovation and collaboration within the team, improving the overall well-being of employees.	Positive, Current	Own operations	Short Long	Promoting diversity among employees creates an inclusive environment that encourages respect, collaboration and the exchange of ideas. Cultural, gender or ethnic diversity stimulates innovation and helps to create a healthy working atmosphere that improves the employees well-being and satisfaction in the short and long term.	Yes, through human resources policies
S4: Privacy (Impact of information on consumers and/or end-users)	Irresponsible and unethical management of customer data, given the large volume of information collected on a daily basis. Inadequate data management can lead to privacy breaches and can have a negative impact on customers and society in general, especially in cases involving PII (Personally Identifiable Information).	Negative, Potential	Own operations	Short	Improper handling of customer data, especially personal information, can lead to loss of trust and financial damage for those affected.	Yes, through data protection and cybersecurity policies

S4: Access to quality information (Impact of information on consumers and/or end-users)	Access to quality information contributes significantly to increasing customer satisfaction and facilitating informed decisions.	Positive, Current	Own operations	Short Long	Providing access to quality information helps customers make informed decisions, increasing their confidence and satisfaction. This helps improve their overall experience and supports their (economic) well-being in the short and long term.	Yes, from the BTFG strategy that prioritizes transparency and customer education/information.
S4: Access to products and services (Social inclusion of consumers and/or fine users)	Facilitating access to finance and promoting financial inclusion for all members of the community, thereby supporting a functioning and equitable economy. Through increased accessibility to financial products and services, individuals have greater opportunities to improve their financial situation, while contributing to the community's economic development.	Positive, Potential	Own operations	All time horizons	Facilitating access to finance and promoting financial inclusion provides opportunities for individuals to improve their financial situation and actively participate in the economy. This supports personal well-being and reduces social inequalities.	Yes, from the BTFG strategy, which prioritizes social inclusion and affordability for all members of the community.
Sustainable financing (BTFG specific theme)	Promoting financial products that respond to customers' needs, integrating not only financial factors but also environmental, social responsibility and governance criteria into customer activity.	Positive, Current	Down	Short Long	Promoting sustainable financial products supports customers in achieving their financial goals while integrating social responsibility. This contributes to equitable economic development and improved living conditions for communities.	Yes, from BTFG's policies and strategy which include targets related to increasing the share of sustainable financing.
Entrepreneurship and financial education (specific BTFG theme)	Impact is achieved by supporting entrepreneurs, start-ups and small businesses in developing entrepreneurial and financial skills and knowledge. This support includes assisting with the funding process (in areas such as financial skills and business management), facilitating access to specialists and training initiatives.	Positive, Potential	Down	Short Medium	Supporting entrepreneurs, small businesses and retail customers through financial education programmes helps them develop the skills needed to manage their personal and business financial resources. It contributes to increased economic stability, providing greater opportunities for professional and personal development both for individuals and communities.	Yes, from the BTFG's policies and strategy which include objectives related to financial education.
G1: Corporate culture	The impact can be generated by reinforcing the positive values of BTFG's corporate culture, which will create trust and confidence among employees, consumers and society.	Positive, Current	Own operations	Short	Reinforcing the positive values of the corporate culture supports employees in creating an ethical, transparent and collaborative work environment. This enhances customers' and consumers' trust, providing real support for their financial needs and fostering relationships based on respect and integrity.	Yes, from BTFG's policies and strategy, which prioritize the promotion of a corporate culture based on transparency, ethics and responsibility towards customers and society.
G1: Protecting the warners	When employees feel safe to report wrongdoing without	Positive, Current	Own operations	Short Long	Creating a safe whistleblowing environment supports employees by giving them confidence that their concerns	Yes, from BTFG's policies and strategy, which

fear of retaliation, it creates a compliant work environment where inappropriate behavior is promptly corrected. This system prevents fraud, abuse and corruption, protecting BTFG's reputation and maintaining public and customers trust.

will be treated seriously and without retaliation. This helps improve the employees morale, increase trust in the organization and reinforce an ethical work environment.

prioritize transparency, ethics and regulatory compliance, thereby protecting employees, customers and the external environment.

G1: Prevention and detection, including training	Training and education activities on anti-corruption and bribery prevention principles and issues can contribute positively to the prevention of corruption. This has a beneficial impact on all stakeholders with whom BTFG employees interact, improving the business environment and confidence in the financial system in general.	Positive, Current	Own operations	Short	Corruption and bribery prevention training activities help employees to understand and apply ethical principles in their work, contributing to a working environment based on integrity and respect. Preventing corruption in the organization contributes to public confidence in the financial system and the private sector. This supports a fairer business environment, reduces inequality and promotes regulatory compliance, which contributes to the overall well-being of society.	Yes, from BTFG's policies and strategy, which prioritize ethical training and the prevention of corruption to support a transparent and trustworthy business environment.
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Theme/Sub-theme/Sub-sub-theme	Material risk description	Magnitude of financial effects	Time horizon	Where the risk comes from
E1: Adapting to climate change	<p>Portfolio: Financing sectors such as agriculture, forestry, fisheries, manufacturing, construction, wholesale and retail trade, motor vehicle repairs, transportation and storage exposes BT to risks associated with climate change. Rising temperatures, desertification, droughts, floods and extreme weather events can disrupt the operational activities of financed companies, affecting crop yields, forest health, fish populations and infrastructure integrity. In addition, the threat of wildfires, heightened in the context of climate change, can lead to significant losses for BT through asset destruction and reputational damage if the bank is perceived to be supporting practices that do not meet sustainable standards.</p> <p>Upstream and Own Operations: BT faces operational and regulatory risks in the context of climate change. Extreme weather events, such as floods or storms, can disrupt day-to-day operations and cause damage to the bank's physical infrastructure. Increasingly stringent environmental regulations can also increase operational costs. These risks can affect business continuity and have a negative impact on BT's reputation if the bank is not perceived as complying with the sustainable and climate responsibility standards.</p>	High	Short Medium	<p>In portfolio: from the financings that the Group grants (impact)</p> <p>Upstream and own operations: from commercial relations and potential legal amendments</p>
E1: Climate change mitigation	Portfolio: Financing sectors such as manufacturing, construction, transportation and warehousing, and real estate transactions exposes BT to risks associated with climate change mitigation. Risks include exposure to litigations related to breaches of environmental regulations or contributions to greenhouse gas emissions, which	High	Medium Long	In the portfolio: from the financings the Group grants (impact) or from the potential legal changes



can lead to lawsuits and penalties, affecting the reputation and finances of the companies involved. The transition to low-emission vehicle fleets and a low-carbon economy are also significant challenges. Reliance on fossil-fuel vehicles, the costs of complying with stricter environmental regulations and the need to finance green technologies and projects can negatively influence efforts to reduce emissions and align with international climate targets. In addition, BT faces the risk of climate change-related litigation, which can have significant financial consequences and affect the bank's reputation and stakeholders' investment decisions.

E1: Energy	Portfolio: Within the financial-banking sector, the high energy consumption of financed companies represents a significant environmental risk for BT in the context of climate change. Low energy efficiency and reliance on carbon-intensive energy sources can increase the environmental footprint of funded companies and undermine climate change mitigation initiatives. This can create pressures at Group level (impact on the portfolio's ability to reduce greenhouse gas emissions).	High	Medium Long	In the portfolio: from the financing the Group grants (impact).
E5: Waste	Portfolio: Ineffective waste management in sectors financed by BT, including agriculture, forestry, fisheries, manufacturing, construction, wholesale and retail trade, motor vehicle repairs, transportation and warehousing, financial intermediation, insurance and real estate transactions, represents a significant environmental risk. Risks include the improper handling and disposal of chemicals, fuels, oils, filters, batteries and used tires, as well as the management of construction and demolition waste. These practices can lead to environmental contamination, resource depletion and increased greenhouse gas emissions. For BT, these forms of indirect impacts create risks that can result in additional compliance costs, financial losses associated with penalties and remediation, and potential reputational damage if the bank is perceived to support unsustainable practices. In addition, there may be direct financial risks, such as the inability of financed companies to repay loans due to high waste management costs or penalties for non-compliance with environmental regulations.	Medium	Short Medium	In the portfolio: from the loans granted by the Group (impact).
S1: Training and skills development	Upstream and Own Operations: Inadequate training and education processes can leave employees without the essential skills and knowledge needed to effectively perform their roles, leading to decreased productivity and inhibiting innovation, ultimately affecting the company's financial performance. This issue is particularly critical given the skills required for a successful digitalization.	High	Short Medium	In own operations: business model and negative impact
S4: Confidentiality	Upstream and Own Operations: Data privacy and cyber security risks can pose major challenges for BT. Data breaches can lead to customers' personal information being compromised, affecting their trust and financial security. Cyber attacks can disrupt banking operations, with the potential to damage the bank's reputation and financial stability.	High	Short	In own operations: business model and negative impact

Theme/Sub-theme/Sub-sub-theme	Material Opportunity Description	Magnitude of financial effects	Time horizon
E1: Adapting to climate change	Portfolio: BT has the opportunity to become a leader in sustainability by financing projects that strengthen climate resilience, encourage environmentally friendly farming practices and facilitate the adoption of low-carbon technologies across a range of sectors, including automotive, construction and	High	Medium Long

manufacturing. This includes investing in electric vehicle infrastructure, sustainable construction methods and improving the efficiency of supply chains. By providing tailored financial solutions for these initiatives, BT can strengthen its market leadership and help advance a more sustainable economy. Upstream and Own Operations: Proactive adaptation to climate change is an opportunity for BT to capitalize on the transition to a low carbon economy. Implementing adaptation strategies, such as investing in resilient infrastructure, diversifying energy sources and developing new products and services, can lead to cost savings, innovation and competitive advantage in an increasingly sustainable-oriented market.

E1: Climate change mitigation	<p>Portfolio: Against the backdrop of efforts to reduce greenhouse gas emissions and increasing demand for fuel efficient vehicles, there is an opportunity for BT to support the automotive industry in the production of hybrid and zero emission vehicles. Entities that limit the use of critical materials and develop alternatives can mitigate supply disruptions and volatile prices, which can have a positive impact on their margins and cost of capital.</p> <p>In addition, promoting energy efficiency and conservation among consumers is an opportunity to reduce greenhouse gas emissions and save costs for both consumers and utilities. Strategies such as energy-efficient appliance rebates, home insulation, and investments in technologies like smart meters can reduce peak demand and lower operating costs for utilities while providing savings for consumers. BT can play a key role in funding these initiatives, thus helping to make the transition to a greener economy.</p>	High	Medium Long
E1: Energy	<p>Portfolio: BT has the opportunity to drive sustainable transformation across sectors by offering financial services that promote the green economy. The bank can support the automotive industry's transition to electric vehicles and finance low-carbon clean energy projects, taking advantage of the regulatory stability and long-term financial arrangements. BT's role includes financing energy storage solutions and energy efficiency improvements in buildings, working with the Romanian government on programs such as "Prima Casă". Prioritizing investments in renewable energy companies and modernizing energy infrastructure are key to reducing emissions and water conservation. Financing advanced technologies in energy generation, storage and distribution offers opportunities for growth and innovation. Competitive mortgage options for energy efficient homes and facilitating Energy Performance Certificates help regulatory compliance and improve property valuations. Financing the expansion and modernization of transmission and distribution networks is critical to energy security and for accommodating new energy capacity. By financing energy efficient properties, BT can reduce the environmental and social risks, ensuring the resilience of its mortgage portfolio in an increasingly sustainable-driven market.</p>	High	Medium Long
S1: Adequate wages	<p>Own operations: Offering attractive remuneration packages by BT can be a competitive advantage in the industry, strengthening the bank's ability to attract and retain top talent. This can contribute to an enhanced reputation and positive perception in the market, with a beneficial impact on the bank's financial performance.</p>	Medium	Short Medium
S1: Work-life balance	<p>Own operations: Supporting a healthy work-life balance can help BT to cultivate a working environment that promotes employees mental health, resulting in increased productivity and an enhanced reputation as an employer, which can contribute to the bank's overall financial performance.</p>	Medium	Short Medium
S1: Health and safety	<p>Own Operations: Focusing on the employees health and safety through preventive health and wellbeing programs can turn BT into an inclusive workplace where wellbeing is a priority. This can lead to reduced absenteeism, increased productivity, increased employees loyalty and a reputation as a responsible and attractive employer.</p>	Medium	Short Medium
S1: Gender equality and equal pay for work of equal value	<p>Own Operations: BT's commitment to the Diversity Charter is a firm pledge to promote diversity and equal opportunities in its workforce. This commitment underscores the bank's dedication to creating an inclusive work environment that recognizes and values the diverse backgrounds and experiences of its employees.</p>	Medium	Mediu Long

S1: Training and skills development	Own operations: Facilitating a training and career development path for employees can contribute significantly to attracting and retaining talent.	High	Short Medium
S4: Access to products and services	Own operations: The emergence of new financing models and technologies presents an opportunity for BT to extend its range of products and services to previously unserved market segments, opening up new sources of revenue. Providing credit and financial services tailored to the needs of low-income populations and small businesses in a responsible way can help to create long-term value and enhance the Bank's reputation.	Medium	All time horizons
Sustainable financing	The opportunity to diversify the portfolio with green products, such as green loans and sustainable bonds, which respond to the growing demand for investments with positive social and environmental impact. This attracts both responsible investors and sustainable-conscious customers, enhancing the Bank's reputation and supporting the transition to a low-carbon economy.	High	Medium
G1: Corporate culture	Own operations: Embracing an innovative culture that encourages digitization and digital transformation can improve BT's operational efficiency and attract a younger, tech-savvy customer base. In addition, embedding sustainability principles into the corporate culture and engaging in green and socially responsible projects can strengthen BT's reputation among ethically and environmentally conscious customers, providing a distinct competitive advantage.	Medium	Short Medium

## 1.4. Impacts, risks and opportunities

### IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities

#### Description of the methodology and assumptions applied in the double materiality analysis process

In 2024, Banca Transilvania carried out a double materiality analysis as required by the ESRS, assessing the impact of its activities on the environment and society, as well as their influence on financial performance. The analysis was performed at a consolidated level and included all entities within the Group, considering upstream, own and downstream operations.

The Double Materiality Analysis (DMA) methodology has been structured in three essential phases:

1. Understanding the context and identifying the list of sustainability issues relevant to the Group

This process consisted of the following:

- Detailed analysis of the entities in the financial consolidation perimeter, grouped by activity (banking, insurance, portfolio management, investment, financial leasing, etc.) including those not included in the financial consolidation perimeter as at December 31,
  - Determining the value chain
  - Identify a team of internal experts from various relevant departments (e.g. Human Resources, Legal, Finance, Procurement, Risk, Investor Relations, Business Lines, etc.) to analyze the impacts, risks and opportunities potentially relevant for the Group.
  - Identify the list of relevant sustainability issues based on information collected at Group level about the business model, value chain and associated challenges.
2. Identification and assessment of impacts, risks and opportunities (IRO)

At this stage, in-house experts conducted a qualitative assessment of potentially relevant impacts, risks and opportunities, taking into account their severity and likelihood of materialization. The determination of the severity of impacts was based on the magnitude and scope as required by ESRS 1.

The list of impacts, risks and opportunities considered material, which was subject to management approval, was derived by quantifying the qualitative assessment, using materiality thresholds and incorporating feedback from external stakeholders.

The upstream operations focused on resource providers and business partners with whom the Group has a direct link, while own operations included the activities of support departments. Downstream operations focused on the loan and investment portfolio.

In order to facilitate the involvement of identified stakeholders, the Group has used material impact assessment questionnaires in the DMA process. The questionnaires were distributed to internal

stakeholders, such as the Group's management (members of the Board of Directors, members of the Leaders' Committee and employees in senior management positions), as well as to various categories of external stakeholders, including customers, suppliers, investors, analysts, financial institutions, auditors, consultants, NGOs, civil society, regulators, shareholders, associations and affiliated companies. The responses received to these questionnaires were centralized, analysed and integrated into the list of impacts.

In addition, we relied on feedback obtained from various communication channels, including customer satisfaction surveys, employee surveys, complaints and grievances from customers and other stakeholder groups on various topics (e.g., privacy, employee discrimination), and whistleblower reports. This information has helped us understand how BTFG's activities affect stakeholders, both positively and negatively.

The results of the analysis have identified the material themes for the Banca Transilvania Financial Group that underlie the information in this statement.

To complement the context analysis, it is recommended to consult external sources such as international reporting standards and benchmarking with similar companies in the industry to obtain information on sustainability issues relevant for the double materiality analysis.

As part of this first double materiality analysis exercise, the Group did not carry out a review of external sources or benchmarking against other companies in the industry, relying on the information available from previous GRI-compliant materiality surveys, which provided us with a robust understanding of the sustainability issues most relevant to our stakeholders and operating context. The Group aims to include such information in future double materiality analysis.

### 3. Validation of results

The preliminary results were validated by the management of the ESG Integration & Investor Relations Division and the final list of impacts, risks and opportunities after integrating the feedback received from internal and external stakeholders was validated by the ESG Committee

#### Identification, assessment, prioritization and monitoring of potential and actual impacts

To identify potentially relevant themes for the double materiality analysis, the Group started with a comprehensive list of sustainability themes and sub-themes. This list included all sustainability issues mentioned in ESRS 1- AR16, as well as other Group-specific issues derived from previous materiality analyses. On the basis of this extended list, the Group conducted a relevance analysis, resulting in a shortlist of 11 potentially material themes and 29 sub-themes.

Given BTFG's business model and group structure, the main impacts are associated with the Bank's loan portfolio (downstream value chain). In this context, we have conducted a detailed analysis to identify the

material impacts generated by the financing granted to the main economic sectors by Banca Transilvania and its banking subsidiaries.

In this analysis, we have adopted a materiality threshold approach to determine which are the main economic sectors and activities funded. Materiality thresholds were set at 10% for the macro-sectoral level, 5% for the sub-sectoral level and 5% for the sub-sub-sectoral level.

The setting of materiality thresholds is based on the financial risk management policy of mitigating concentration risks and strategically aligning the portfolio of Banca Transilvania and its banking subsidiaries with risk appetite. These thresholds are intended to prioritize exposures according to their potential impact on the overall risk profile of Banca Transilvania and its subsidiaries

After identifying the main sectors financed, the next step was to identify the associated impacts, using the UNEP Impact Radar methodology as a reference, given that Banca Transilvania is a signatory of the UNEP FI - Principles for Responsible Banking (PRB). This methodology, provided by UNEP FI for the analysis of impacts, ensures interoperability with the ESRS

The identification of impacts related to upstream operations and own operations has been carried out by using the results from the context analysis, as well as from the use of information previously collected from the application of other reporting standards (e.g. GRI Standards)

To avoid duplication, the identified impacts were grouped, analyzed, discussed and validated with internal experts from relevant departments. The result of this process was a list of significant impacts identified across the Group's value chain.

In terms of assessment, impacts need to be considered in relation to their **severity** and **likelihood of materialization**, but also in the context of different **time horizons** (short, medium and long term)

Severity is determined on the basis of magnitude, scope and irrecoverability according to ESRS 1 AR 10

- **Magnitude** refers to how serious the negative impact is or how beneficial the positive impact is for people or the environment.
- **Scope** indicates how widespread the negative or positive impact is.
- **Irremediability** refers only to negative impacts and indicates whether and to what extent the negative impact could be remedied.

Likelihood is only relevant to potential impacts and is an indication of the likelihood of an impact occurring.

The time horizons considered are those specified in ESRS 1.

In the case of potential negative human rights impacts, their severity takes precedence over their likelihood, which means that once these impacts reach a certain level of severity, they must be taken into account, regardless of the fact that the likelihood of occurrence is low.

In assessing the materiality of impacts, we used a scale from 0-5, and the threshold for an impact to be material was set at 2.5.

The threshold chosen is consistent with recommended practices in sustainability reporting (as set out in EFRAG's Implementation Guidance on the DMA) to identify as significant only those impacts that have the potential to materially affect stakeholders and/or the environment.

Impacts assessed below the threshold of 2.5 are classified as "Informative" or "Minimal" and are not considered significant for decision making or reporting.

Identifying, assessing, prioritizing and monitoring risks and opportunities

We recognize that our operations have a significant impact on various stakeholders, including customers, employees and the environment. For example, our lending practices influence the carbon footprint of the sectors we finance, while changes in regulatory frameworks (e.g. climate-related regulations) can affect our financial performance.

In order to identify material risks and opportunities, in the absence of stress testing or scenario-based analysis in place at the reporting date, we have used context and value chain analysis, internal risk management methodologies, risk analysis associated with the main economic sectors that the Bank and its subsidiaries finance, ESG risk analysis integrated into our funding process as well as the professional expertise of experts in our risk department who have a deep understanding of the Group's operational impact, relevant legislative regulations and emerging trends that could influence our business.

The analysis was mainly based on past events, current programmes and existing preventive measures. We plan for the next reporting cycle to include scenarios and forecasts relevant to the Group's operational and regulatory context.

In terms of valuation, risks and opportunities were assessed in terms of the magnitude of the financial effect and the likelihood of occurrence.

A scale of 0-3 was chosen for the magnitude of financial effect (0 being no impact and 3 being critical), where each value represents the level of potential impact that a particular risk or opportunity could have on BTFG's financial performance or operations. This scale, although simplified to capture the most significant potential financial impacts, was correlated with BTFG's risk scale (which ranges from 0 to 5).

A scale of 0-5 was chosen for the probability of occurrence which allows a more detailed assessment of the likelihood of a particular risk or opportunity materializing.

The financial materiality threshold was set at 1.5, based on the objective of capturing all risks and opportunities that could have at least a significant impact on the business, while filtering out risks and opportunities that would have a minimal impact on BTFG.

The Bank has not prioritized sustainability risks over other types of risks.

## Implemented Controls

The Bank has established clear roles and responsibilities for the conduct of the double materiality analysis to ensure the robustness of the process and the relevance of the conclusions

- A department was appointed to coordinate this analysis, which checked the results of each step and provided feedback that was discussed and integrated into the final conclusions
- It established a working group, consisting of experts from various relevant departments (such as Human Resources, Legal, Finance, Procurement, Risk, Investor Relations and Business Lines), which actively participated in all stages of the process.
- Progress and preliminary results of the double materiality analysis were presented at ESG Committee meetings for discussion and feedback.
- The ESG Committee formally endorsed the material themes resulting from the double materiality analysis.
- These themes were subsequently presented and validated by the Audit Committee.

## Changes since previous reporting period

This is the first year that the Group reports in accordance with the methodology required by the CSRD and ESRS. In previous reporting periods, the Group followed the Global Reporting Initiative (GRI) standards, which provided a framework for sustainability reporting but had different materiality requirements. Under GRI, the main focus was on stakeholder engagement and the identification of material sustainability issues. With the adoption of CSRD and ESRS, we moved to a double materiality perspective. Therefore there are no changes to the impacts of risks and opportunities.



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## ENVIRONMENTAL INFORMATION

Taxonomy information

Climate change

Circular economy

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## 2. ENVIRONMENTAL INFORMATION

### 2.1. Taxonomy information

Information According to Article 8 of EU Regulation 2020/852 (EU Taxonomy)

The EU Taxonomy Regulation 2020/852 aims to facilitate the transition to a sustainable economy by providing a clear framework that allows both financial and non-financial entities to classify their activities in terms of sustainability. This framework is based on six environmental objectives:

- **Climate change mitigation:** Reducing greenhouse gas emissions.
- **Climate change adaptation:** Creating solutions to mitigate the negative impacts of climate change.
- **Sustainable use and protection of water and marine resources:** Promoting responsible management of water resources and marine ecosystems.
- **Transition to a circular economy:** Improving resource efficiency and promoting recycling.
- **Pollution prevention and control:** Reducing emissions of pollutants to air, water and soil.
- **Protecting and restoring biodiversity and ecosystems:** Conserving and restoring natural habitats and biodiversity.

The Taxonomy uses two evaluation criteria to assess the sustainability of economic activities: eligibility and alignment.

**Eligibility** acts as a preliminary filter determining which economic activities can contribute to one or more of the six environmental objectives.

**Alignment** assesses the extent to which eligible activities make a significant contribution to at least one environmental objective, without significantly harming other objectives (Do No Significant Harm - DNSH) and respecting minimum social and governance standards (Minimum Social Safeguards - MSS).

The proportion of exposures aligned to the EU Taxonomy in relation to covered assets (total assets excluding exposures to central governments, supranational issuers, central banks and the trading book) constitutes the Green Asset Ratio (GAR).

#### Reporting obligations

According to Article 8 of the EU Taxonomy Regulation and Delegated Regulation (EU) 2021/2178, financial institutions are required to determine and disclose, by 2024, the ratio of eligible assets to covered assets for the six environmental objectives, as well as the ratio of green assets for two of them: climate change mitigation and adaptation.

The Banca Transilvania Financial Group publishes, for the second consecutive year, the EU Taxonomy report, in compliance with the Delegated Regulation complementing Article 8 of the EU Taxonomy

Regulation 2020/852. This report includes the reporting forms for the key performance indicators for asset managers and credit institutions set out in Annexes IV and VI, the reporting form for the indicators for nuclear and fossil gas activities as set out in Annex XII, and the qualitative information as set out in Annex XI of the Delegated Regulation.

Taxonomy reporting covers the entities in the Group's prudential consolidation perimeter and applies the reporting requirements for financial institutions set out in Regulation (EU) No 575/2013 and Commission Implementing Regulation (EU) 2021/451 (FINREP). At December 31, 2024, the Group consolidates OTP Bank Romania, a subsidiary that is subject to Articles 19a and 29a of Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards sustainability reporting by undertakings (CSRD), but is exempt from sustainability reporting.

In accordance with the requirements of the Regulation, the Group publishes the EU Taxonomy report for the previous reporting period. However, it is important to note that any comparison between the two reporting periods needs to take into account the changes in the reporting perimeter in 2024 compared to 2023.

#### Calculation methodology and limitations

Eligibility and alignment relate to a limited number of economic sectors and exposures to companies included in the scope of the CSRD.

The Banca Transilvania Financial Group reports the eligibility of its activities to the taxonomy for the six climate objectives and the alignment to the taxonomy for the first two objectives, climate change mitigation and climate change adaptation.

In order to identify the economic activities eligible and aligned to the taxonomy, the Group examined the portfolio of loans, investments and guarantees related to residential and commercial real estate property obtained through possession, with counterparties, financial and non-financial entities, included in the scope of the CSRD, individual customers and local governments.

Assets covered by the key performance indicator are calculated as the gross book value of total assets on a prudentially consolidated basis, excluding exposures to central governments, supranational issuers, central banks and the trading book.

The Banca Transilvania Financial Group has significant exposure to small and medium-sized enterprises (SMEs), which are currently not included in the reporting requirements of the taxonomy. The Bank also has significant exposure to sectors such as agriculture and medical practice, which are not included in the scope for determining eligibility under the taxonomy. In addition, the Group has three subsidiaries in the Republic of Moldova, a country outside the EU. However, as the exposures of these subsidiaries (financing and investments) represent an insignificant percentage of the Group's total exposures as at 31 December 2024 (approximately 3%), a separate green asset ratio is not reported for these exposures.

They are included in the category "Non-EU counterparties not subject to disclosure requirements under the Non-Financial Reporting Directive" as per the form in Annex VI.

### 1. Determining eligibility

For known purpose funding, the Group reports the entire exposure as eligible or aligned.

In the case of general-purpose financing, the weights of eligible and aligned economic activities according to the Taxonomy, based on turnover and capital expenditure (CAPEX), were extracted from the most recent non-financial reports published by non-financial companies. The collection of non-financial reports was performed by an internal Bank team.

It should be noted that the indicators collected refer to 2023, as these companies have not yet published information for 2024. Also, our clients' reporting on eligibility and alignment with the EU taxonomy is low, less than 20% of the companies included in 2023 for non-financial reporting purposes (NFRD) financed by the Bank or the Group have eligibility and alignment data included in their 2023 reports. In this context, the relevant exposures have been categorized according to the six environmental objectives, using the NACE code of the main sector of the clients that the Group finances. These sectors have been checked to ensure that they are included in the EU Taxonomy Compass (Taxonomy eligible activities). If a NACE code was identified as eligible for more than one environmental objective, an internal analysis was carried out by experts in the commercial and credit analysis departments to determine which objective was relevant, depending on the purpose of the financing provided. For future reporting periods, the Bank proposes to introduce new fields in the CRM system highlighting the climate objective associated with each credit facility. Accordingly, in 2024, the Bank has commenced a process to modify the CRM (credit risk management) system in this regard.

### 2. Determining alignment

For eligible funding provided to non-financial companies for which the intended use of the funds is known, the Group has carried out its own assessment to ensure that the information provided by clients on the alignment of the funded activity to the taxonomy provides sufficient evidence of:

- Compliance with the relevant Technical Screening Criteria (TSC).
- The significant contribution of the funded activity to climate change mitigation or adaptation objectives.
- Absence of significant damage to other objectives.
- Compliance with minimum social and governance standards.

This assessment has been carried out as required by EU Regulation 852/2020, based on information provided by customers.

Financings for which the alignment assessment was performed were reported as 100% aligned with the taxonomy.

In the case of loans to individuals, eligibility and alignment are determined for loans secured by residential real estate solely at the Bank's portfolio level. The portfolio reported as aligned consists of properties built before January 1, 2021 and that have a valid Class A Energy Performance Certificate (EPC) valid as of the reporting date.

In order to comply with the DNSH principle under activity 7.7 "Acquisition and Ownership of Buildings", as defined in the Delegated Regulation, the EU Taxonomy requires a rigorous assessment of climate risks and vulnerabilities according to the criteria set out in Annex A of the Delegated Act. According to the report published by the NBR, "Climate Risk Monitoring Dashboard on the Romanian Banking Sector 2024", the main physical risks relevant for Romania include floods, droughts and high temperatures. In addition to these climate risks, there is another significant risk, the seismic risk. Banca Transilvania has conducted its climate risk and vulnerability assessment through an internal application that collects indicators from various external sources and analyzes climate, weather, flood, seismic and climate adaptation risks. Following this assessment, Banca Transilvania classifies exposures into seven risk categories, from very low to very high. Thus, buildings with a very high exposure to these risks have been considered not in line with the EU Taxonomy criteria, as the implementation of adaptation measures cannot be validated at present.

As regards the minimum social and governance standards set out in Article 18 of the Taxonomy Regulation, Commission Communication C/2024/6691 of 08.11.2024 specifies, in response to question 37, that the assessment of these standards is not necessary for retail clients.

The main limitation in determining the aligned portfolio of loans secured on residential real estate collateralized loans to individuals is the limited extent to which information taken from energy performance certificates, such as energy class and validity date, is recorded in the Bank's internal systems. Although the Bank offers to retail customers dedicated real estate lending products for high energy performance buildings (EPC class A), for reporting alignment with the EU taxonomy we have taken a conservative approach, reporting only the portfolio for which the energy class and validity date could be extracted from the EPC through an Optical Character Recognition (OCR) process and the validity of this data was subsequently verified.

The alignment of loans for building renovation and car loans could not be achieved due to the lack of information necessary for the DNSH assessment of these financings.

Exposures to local governments are also reported as unaligned in the absence of disclosures by these entities.

For financial guarantees, the methodology used to calculate the KPI is similar to that applied for loans. For transactions where the destination of funds is not known, KPIs based on turnover and CAPEX reported by the companies were used. For exposures for which the destination of funds is known, the alignment has been assumed to be 100% for financings for which the Bank has performed its own assessment.

As of December 31, 2024, the Group does not hold a portfolio of Managed Assets. Funds managed through investment subsidiaries BT Asset Management and OTP Asset Management are not included in the prudential consolidation perimeter. For this reason, the Group is not required to separately disclose Annex IV of the Delegated Regulation.

For the reporting of the flow KPIs, the main assumption is related to the categories of assets on purpose. As specified in the Commission Communication C/2024/6691 of 08.11.2024 under question no. 65, when calculating the key performance indicator on flow in Template 4 of Annex VI, we have considered for both the denominator and the numerator of the GAR indicator only the gross carrying amount of newly created exposures (i.e. new loans and advances, debt securities and equity instruments).

As of December 31, 2024, the Group has no exposures to customers engaged in economic activities related to the production of electricity or heating using nuclear facilities and has limited exposures to customers engaged in economic activities related to the production of electricity or heating using gaseous fossil fuels in heat/cooling and power generation facilities.

The tables included in Annex VI of the Delegated Regulation are presented in duplicate to reflect calculations based on the turnover and capital expenditure (CAPEX) weights of eligible and aligned activities taken from the reports of clients that the Group finances or invests in.

The table "Summary of KPIs on which credit institutions are required to provide information under Article 8 of the Taxonomy Regulation" summarizes the KPIs at consolidated level for BT Group for the year 2024. These indicators are detailed in the forms set out in the Annex "Tabular information under Article 8 of the Taxonomy Regulation".

		Total environmentally sustainable assets ( <i>million lei</i> )	KPI (*4)	KPI (*5)	% coverage (in total assets) (*3)	% of assets excluded from the GAR counter (Article 7(2) and (3) and Annex V, Section 1.1.2)	% of assets excluded from the GAR denominator (Article 7(1) and Annex V, Section 1.2.4)
Main KPIs	Green Asset Rate (GAR) stock	710,74	0,67%	0,67%	49,79%	72,83%	45,42%
		Total environmentally sustainable activities ( <i>million lei</i> )	KPI	KPI	% coverage (in total assets)	% of assets excluded from the GAR counter (Article 7(2) and (3) and Annex V, Section 1.1.2)	% of assets excluded from the GAR denominator (Article 7(1) and Annex V, Section 1.2.4)
Additional KPIs	GAR (on flow)	905,54	1,39%	1,39%	25,89%	82,49%	32,37%
	Trading portfolio (*1)						
	Financial guarantees	7,14	0,99%	7,11%			
	Assets under management	0,00	0,00%	0,00%			
	Fee and commission income (*2)						

\*For credit institutions which do not meet the conditions set out in Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

\*\* Fee and commission income from services other than lending and asset management

The institutions shall provide forward-looking information on these KPIs, including information on the targets pursued, together with relevant explanations of the methodology applied.

\*\*\* % of assets covered by KPIs in banks' total assets

\*\*\*\*based on counterparty turnover KPI

\*\*\*\*\* on the basis of the counterparty's CapEx KPIs, except for lending activities where, for general lending activities, turnover KPIs are used

Note 1: In all reporting templates: cells hatched in black are not reported.

Note 2: The KPIs on fees and commissions (Factsheet 6) and on trading book (Factsheet 7) only apply from 2026 onwards. The inclusion of SMEs in these KPIs will only apply subject to a positive outcome of an impact assessment.

### Change in GAR indicators compared to previous year

The ratio of green assets to inventory at December 31, 2024 is 0.75% on both a turnover and CAPEX basis, compared to 1.38% and 1.46%, respectively, at December 31, 2023.

Similarly, the green assets to flow ratio shows a decrease from the previous year being 1.39% on both turnover and CAPEX basis in 2024 compared to 3.00% on turnover basis and 3.07% on CAPEX basis in 2023.

For both stock and flow GARs, the main contributor is the portfolio of loans secured on residential real estate to individuals. In addition, the Group has assessed taxonomy alignment for a number of loans with a known destination of funds granted to non-financial companies included for CSRD reporting purposes. The decrease in these indicators compared to the prior year is due to a more stringent review of the portfolio of residential real estate secured loans to individuals, which was assessed to be taxonomy aligned. For 2024, the Bank adopted a conservative approach, reporting only the portfolio for which the energy class and validity date were extracted from the EPC (energetic performance Certificates) through an Optical Character Recognition (OCR) process and subsequently checked for validity.

The GAR on Financial Guarantees is 0.99% based on turnover and 7.11% based on CAPEX.



## 2.2. Climate change

### Carbon footprint

Calculating the carbon footprint for BTFG's own consumption involved the following steps:

1. Establishing the consumption categories for the calculation of the Carbon Footprint related to own activity:

- Scope 1 - Stationary combustion: Direct greenhouse gas (GHG) emissions from the combustion of fuels in stationary sources such as boilers and furnaces
- Scope 1 - Mobile combustion: Direct GHG emissions from the combustion of fuels in mobile sources such as company owned or operated vehicles
- Scope 1 - Refrigerants: Direct GHG emissions from the use and leakage of refrigerants in refrigeration and air conditioning equipment
- Scope 2 - Electricity purchased on a market basis, including heating and steam: Indirect GHG emissions associated with the purchase of electricity, steam, heat or cooling, calculated on the basis of the energy market and energy contracts
- Scope 3 - Goods and services purchased: indirect upstream GHG emissions resulting from the production of goods and services purchased by the company
- Scope 3 - Fuel and energy activities: indirect upstream GHG emissions resulting from the extraction, production and transportation of fuels consumed by the company, as well as energy transmission and distribution losses
- Scope 3- Waste generated in operations: Indirect upstream GHG emissions resulting from the disposal and treatment of waste generated by company operations
- Scope 3 - Business travelers, including emissions from business travelers staying in hotels: Upstream indirect GHG emissions resulting from the transportation of employees for business activities in vehicles owned or operated by third parties, including emissions from stays at hotels
- Scope 3 - Employee commuting: Indirect upstream GHG emissions resulting from the transportation of employees between their homes and workplaces

2. Collection and centralization of consumption data at BT level, respectively at BTFG level;

3. Purpose categorization of collected data

4. Using emission factors to calculate the Carbon Footprint, factors indicating the amount of CO<sub>2</sub>/unit of consumption

5. Apply these factors to the total consumption for each purpose;

## Databases used for emission factors

1. The DEFRA database, provided by the UK Department for Environment, Food and Rural Affairs (DEFRA), is a valuable source of emission factors, specifically designed to provide data and technical information for local emission inventories, and is a trusted resource for quantifying greenhouse gas emissions associated with various activities. These emission factors play a crucial role in helping companies and governments make informed decisions about reducing their impact on the environment.
2. EPA: The Emission Factor Hub, provided by the U.S. Environmental Protection Agency (EPA), was designed to provide organizations with a regularly updated, easy-to-use set of default emission factors for reporting greenhouse gas emissions at the organizational level.
3. ANRE (National Energy Regulatory Authority) is a regulatory authority for electricity and natural gas in Romania. It has the responsibility to monitor and implement energy efficiency measures and to promote the use of renewable energy sources to the final consumer. ANRE publishes CO<sub>2</sub> emissions for each type of primary energy in Romania in an annual report, which monitors the electricity market.
4. HG Protocol Life Cycle Databases: This list of third-party databases helps users to collect data for greenhouse gas (GHG) inventories across the product life cycle and corporate value chain (Scope 3).
5. Eurostat provides a comprehensive database for calculating the carbon footprint, including emission factors and other data relevant for local emission inventories. This is a valuable resource for quantifying greenhouse gas emissions associated with various activities.
6. Bilan Carbone V7 is a carbon footprint calculation tool developed by ADEME (Agence de l'environnement et de la maîtrise de l'énergie) and managed by ABC (Association Bilan Carbone). It provides a detailed methodology for quantifying greenhouse gas (GHG) emissions associated with the activities of an organization, product, individual or community

Scope	Activity	2023	2024	Variation
Scope 1	Stationary Combustion	2.688,16	3.411,54	26,91%
Scope 1	Mobile combustion	2.885,66	3.787,74	31,26%
Scope 1	Refrigerants	1.295,48	444,70	-65,67%
Scope 1	Scope 1 - Total	6.869,30	7.643,98	11,28%
Scope 2	Purchased electricity (location-based)	5.662,61	4.169,78	-26,36%
Scope 2	Purchased electricity (market-based)	1.760,64	1.370,01	-22,19%
Scope 2	Thermal energy	228,99	385,11	68,18%
Scope 2	Scope 2: Total - Location-based	5.891,60	4.554,89	-22,69%
Scope 2	Scope 2: Total - Market-based	1.989,63	1.755,12	-11,79%
Scope 3	Goods and services purchased	27.912,86	38.888,55	39,32%
Scope 3	Capital goods	1.471,38	1.109,49	-24,60%
Scope 3	Fuel and energy related activities (not included in Scope 1 sau 2)	1.658,70	3.045,00	83,58%
Scope 3	Waste generated in operations	964,86	1.883,39	95,20%
	Business travelers	624,19	948,81	52,01%
Scope 3	Business travelers – by air or train	497,30	818,93	64,68%
	Business travelers - hotels	126,89	129,88	2,36%
Scope 3	Employee commute	17,33	20,51	18,35%
Scope 3	Scope 3 - Total	32.649,32	45.895,74	40,57%
Total	Total Emisions - location-based	45.410,22	58.094,62	27,93%
<b>Total</b>	<b>Total Emisions - market-based</b>	<b>41.525,58</b>	<b>55.315,35</b>	<b>33,21%</b>

Following the revision of the carbon footprint calculation methodology, the following corrections and updates have been made to the data published in 2023:

- For Scope 3 - Goods and services purchased, the 2023 calculation included only Banca Transilvania's purchases. In 2024, we extended the analysis to the Group level, including acquisitions of subsidiaries, to more accurately reflect the total impact generated.
- In Scope 3 - Waste generated from own operations, an erroneous emission factor was used in 2023. We have updated this factor and the total emissions for 2023 have been recalculated accordingly.
- Please note that for Scope 3 - Capital Goods, only emissions related to investments made by Banca Transilvania are included, without covering emissions generated by subsidiaries.

The increase in emissions this year mainly reflects the intensification of our operational activity - both as a result of the organic growth of the portfolio and of the expansion through acquisitions. This dynamic has led to a higher consumption of resources, and hence a carbon footprint commensurate with the Group's growth rate. However, the Group's emissions intensity as a proportion of turnover fell in all categories, indicating a more efficient use of resources in relation to the value of the business.

## Greenhouse gas emission intensity

Greenhouse gas emission intensity (tCO <sub>2</sub> / mil. lei)		2023	2024	Variație
Scope 1	Scope 1 - Total	0,60	0,47	-22,22%
Scope 2	Scope 2: Total - Location-based	0,52	0,28	-45,96%
Scope 2	Scope 2: Total - Market-based	0,17	0,11	-38,34%
Scope 3	Scope 3 - Total	2,86	2,81	-1,74%
Total	Total Emissions - location-based	3,98	3,56	-10,57%
Total	Total Emissions - market-based	3,64	3,39	-6,89%

## Financed emissions

The Partnership for Carbon Accounting Financials (PCAF) is a global standard used by financial institutions to measure and report greenhouse gas (GHG) emissions associated with their credit and investment portfolios. It plays a fundamental role in helping organizations understand their carbon footprint, thereby enabling them to develop strategic initiatives for more sustainable lending and investment activity. PCAF has developed different methodologies tailored to measure emissions for various financial products and investment categories, including but not limited to project finance, mortgage lending, commercial real estate lending, auto lending, corporate lending and investing

The application of the Partnership for Carbon Accounting Financials (PCAF) methodology in the Banca Transilvania Financial Group involves a systematic, multi-step process designed to assess and quantify the financed emissions associated with various financial products.

### Organizational boundaries

The methodology is applied at Group level for subsidiaries managing portfolios of loans and/or investments eligible under the PCAF methodology.

These subsidiaries are Banca Transilvania, Victoriabank, BCR Chișinău, OTP Bank Romania, Salt Bank, BT MIC, BT Leasing Transilvania, BT Leasing Moldova, BT Asset Management, OTP Asset Management, BT Pensii, Improvement Credit Collection, Avant Leasing, BT Invest 1, BT Investmen, BT Building.

### Geographical scope

Geographically, the assessment covers the two regions in which BTFG operates:

- Romania, the Group's main country of operations.
- Moldova, through the presence of three subsidiaries, Victoriabank, BCR Chisinau and BT Leasing Moldova.

## Reporting period

The determination of financed emissions is carried out annually. This ongoing assessment allows the Group to track progress over time and adjust its financing strategies in line with emission reduction targets.

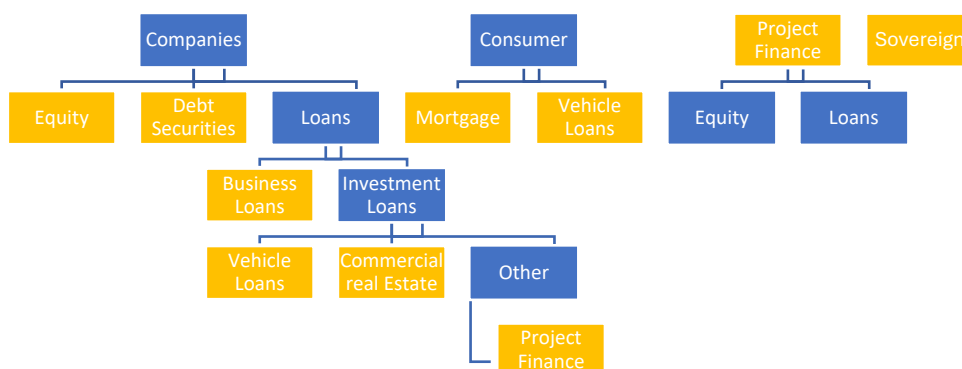
## Detailed Methodology

### Determination of Eligible Exposures

The initial phase involves identifying eligible exposures for carbon accounting. The calculation algorithm takes into account all eligible exposures such as loans, equity and debt instruments and government securities.

### Allocation of exposures according to the PCAF methodology

Eligible exposures are categorized into one of the categories established by the PCAF, according to the logical scheme below.



Financial instruments in the investment portfolio are categorized into equity instruments, debt instruments (corporate bonds) and government securities, depending on the type of instrument and the type of counterparty.

The classification of loans into one of the asset categories according to the PCAF is based on the use of funds.

Loans to legal entities with a known destination of funds are classified as either project financing, commercial real estate loans or auto loans. Loans to legal entities with unknown purpose of funds are classified in the general category of loans to enterprises.

In the case of loans to individuals, only two categories of financing are currently eligible for the card footprint calculation, residential real estate loans and car loans.

The Bank and its subsidiaries have developed an internal methodology, based on PCAF definitions, to identify and classify exposures into the appropriate asset classes.

### Selection of Emission Factors

Greenhouse gas emissions associated with credit and investment portfolios can be estimated using three main methods:

- Issues reported directly by the counterparty
- Emissions based on physical activities (e.g. fuel consumption, tons of steel produced, etc.)
- Emissions based on economic activities (e.g. tCO<sub>2</sub> per million lei of revenue)

**Directly reported emissions:** This method is based on emissions reported by counterparties voluntarily in their sustainability reports, annual reports or other public documents. These reports typically include Scope 1 emissions (direct emissions from own sources) and Scope 2 emissions (indirect emissions from the use of purchased energy). The Group collects this information from Bloomberg for clients that report data on this platform.

**Emissions based on operational activity:** The Group does not currently collect information related to the physical operations of the customers it lends to or invests in such as fuel consumption, production volumes or energy consumption. As a result, this method is not used in the calculation of financed emissions at this time.

**Emissions based on economic activities:** When both direct emissions and data on companies' physical operations are not available, the Group uses economic indicators to estimate GHG emissions. The indicators used differ depending on the asset class to which they apply:

- For corporate loans, project finance loans, debt securities and equity instruments whose counterparty is in Romania, we apply sector-specific emission intensity factors, representing the average emissions generated by each sector per unit of turnover of the sector.
- For corporate credits, project finance loans, debt securities and equity instruments whose counterpart is not in Romania, emission factors are estimated by applying a multiplier to the emission intensity factors calculated for Romania. This multiplier reflects the ratio of the GHG emissions per unit of GDP PPP (tCO<sub>2</sub>eq/kUSD/year) of each country relative to those of Romania.
- For commercial real estate and residential real estate loans, we use emissions in tCO<sub>2</sub> in tCO<sub>2</sub> per square meter from the PCAF database on European building emission factors.
- For car credits, emissions data in gCO<sub>2</sub> per kilometer are taken from the European Environment Agency's CO<sub>2</sub> emissions database. For electric cars, the GHG emissions are estimated based on the GHG emission intensity of electricity generation at country level extracted from <https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emission-intensity-of-1/greenhouse-gas-emission-intensity-of-electricity-generation-country-level> and the estimated consumption of an electric car.

- For sovereign , we collect countries' total emissions in tCO<sub>2</sub>e from the European Commission's Emissions Database for Global Atmospheric Research (EDGAR).

PCAF requires financial institutions to report the absolute Scope 1 and Scope 2 emissions of the clients they lend to or invest in across all economic sectors. Reporting of Scope 3 emissions must be done separately, detailing the sectors to which they relate. If Scope 3 emissions are not reported due to data unavailability or uncertainty, this should also be disclosed.

Most of the emissions financed by the Group are derived using the economic indicators mentioned above or from average emission factors applicable to commercial buildings, residential buildings or vehicles. Currently, only a limited number of customers in the Group's portfolio report Scope 1 and Scope 2 emissions volumes. Therefore, Scope 3 emissions related to customer activities in the portfolios of subsidiaries included in the calculation of financed emissions are not included in this report.

In order to determine which categories of emissions are covered by the data taken from public sources and used in our calculation algorithm to determine the funded emissions, we conducted a review of the methodologies published by the respective data providers. Our findings indicate that these data - with the exception of commercial buildings and residential buildings - mainly cover only direct Scope 1 emissions.

For commercial and residential buildings, we use indicators from the public database provided by the PCAF, which contains information on emission factors for European buildings. We assume that these data include both Scope 1 and Scope 2 emissions. This assumption is based on the correlation between the requirements of the PCAF standard, which requires financial institutions to account for absolute Scope 1 and Scope 2 emissions associated with the energy consumption of financed buildings over the lifetime of their use for existing properties, and the information on emission factors for European buildings publicly available from the PCAF.

#### Data collection and assumptions used

Financial data as well as issues related to clients financed or invested in by the Group are taken either from our internal databases or from various external sources.

**Financial information** such as assets, liabilities and shareholders' equity, as well as total revenues reported by clients that are credited or in which the Group invests through equity, debt and sovereigns, is obtained from our internal databases or from external sources such as the Bloomberg platform. The data is primarily derived from individual client financial statements. Where this information is not available on an individual client basis, we rely on information available from the consolidated financial statements of the groups to which they belong. It is important to note that there is a one-year lag between the reporting date of BT Group funded issues and the date of the financial information (e.g. for a reporting date of December 31, 2024, the financial information would be as of December 31, 2023). This mismatch arises because of the different reporting deadlines for financial institutions and



corporates, with the latter having a longer timeframe. For financial disclosures in foreign currency, the conversion into RON is made using the exchange rate prevailing at the date of the financial statements.

**The market capitalization** required to calculate the Enterprise Value Including Cash (EVIC) indicator for listed companies is taken either from the BVB website.

**Emissions data** is taken from the Bloomberg platform or from sustainability reports published by clients and refers to Goal 1 and Goal 2.

In order to derive the emissions associated with the portfolio of government tilings, we collect GDP at purchasing power parity (PPP) (international USD) data from [Worldbank](#) and total reported country emissions of TCO<sub>2</sub> equivalent from the [EDGAR](#) database. These data are then converted into RON equivalent using the exchange rate applicable for the year to which the reported data refer.

For commercial and residential buildings, the emission indicators in TCO<sub>2</sub> per square meter are taken from the [PCAF](#) database .

To derive emissions from car credits, we use data on GCO<sub>2</sub> emissions per kilometer from the [European Environment Agency's](#) database.

The multiplier applied to the emission intensity factors calculated for Romania reflects the ratio of GHG emissions per unit of GDP PPP (tCO<sub>2</sub>eq/kUSD/year) of each country relative to Romania's and is calculated based on information extracted from the report [EDGAR](#) with GHG emissions of all countries in the world.

For commercial and residential real estate loans as well as for vehicle loans we apply a number of assumptions:

- EPC ratings and floor area are standardized when actual data are not available (assume EPC class C and a floor area of 70 m<sup>2</sup>)
- the distance traveled by the vehicle is set at 50,000 km.

We have several commercial real estate loans in our portfolio for which the collateral consists of residential properties such as single-family or multifamily homes. Due to the uncertainty of the use of the property (e.g. either as office space, doctor's office, etc.), the Group has taken a conservative approach by classifying these collateral as "Non-Residential" in accordance with the classification in the PCAF database on European building emission factors for commercial real estate.

For vehicle loans financing electric cars, the Group estimates emissions based on the vehicle's electricity consumption. This estimate is based on the GHG emissions intensity of electricity generation at country level, together with an estimated consumption of 15.5 kWh per 100 km for electric vehicles.

## Determination of attribution factors

These factors determine the share of emissions that can be attributed to the Group based on the volume of financing provided. Attribution factors are calculated by taking the balance of a loan or investment and relating it to some measure of total value (such as the value at origination for real estate or vehicles or the enterprise value for loans to companies). This factor is always limited to 1.

The following formulas are used to calculate the attribution factor:

- Loans to companies, project finance loans, equity instruments and debt securities with listed counterparties:
  - Attribution factor = credit balance / EVIC
- Loans to companies, loans for project financing, investments in equity instruments and debt securities with counterparties that are not listed entities:
  - Attribution factor = loan balance / (total debt + equity)
- Sovereigns:
  - Attribution factor = investment balance / PPPGDP\_USD (RON equivalent)
- Commercial real estate and residential real estate loans:
  - Attribution factor = Loan balance / Property value at the time of origination
- Vehicle loans:
  - Attribution factor = Loan balance / Vehicle value at time of origination

## Calculating total emissions

These are the total greenhouse gas emissions of counterparties. We prioritize the emissions reported by companies to calculate emissions. Where these emissions are not available or could not be collected we apply the following algorithm depending on the type of financing:

- Corporate loans, project finance loans, debt and equity instruments: Total emissions = Total revenue (before adjusting for inflation) \* Emissions by industry (in tCO<sub>2</sub> per million ron)/10<sup>6</sup>
- Sovereigns: Total emissions = Total emissions of the country (in tCO<sub>2</sub> equivalent)
- Commercial real estate loans: Total emissions = Built area \* Emissions per square meter for commercial buildings (in tCO<sub>2</sub>)
- Residential real estate loans: Total emissions = Built area \* Emissions per square meter for residential buildings (in tCO<sub>2</sub>)
- Vehicle loans: Total emissions = Distance traveled by vehicle \* Emissions per kilometer for cars (in gCO<sub>2</sub>)/10<sup>6</sup>

## Calculation of financed emissions

Financed emissions are determined using the following criteria:

- For exposures with an attribution factor greater than 1: the financed emissions will be equal to the total emissions associated with the respective exposures.
- For exposures with an attribution factor less than 1, the financed emissions will be calculated by multiplying the attribution factor by the total emissions.

When the attribution factor or total emissions are equal to 0, an average intensity is calculated on the basis of exposure class and economic sector. This average intensity shall be derived from the sum of the on-balance sheet exposures in the asset class and sector and the total funded issuance related to the asset class and sector.

## Allocation of Data Quality Score (DQS)

The Data Quality Score (DQS) in the context of the CFAP methodology refers to the reliability of the data used to calculate the financed emissions. The PCAF framework understands that the accuracy of carbon accounting can be affected by the availability, specificity and quality of the underlying data. Therefore, it introduces the concept of SQD to encourage transparency and improve data quality over time.

Quality levels: The PCAF methodology usually categorizes data into different quality levels. Thus, reported and verified company emissions data score better than estimated or default emissions.

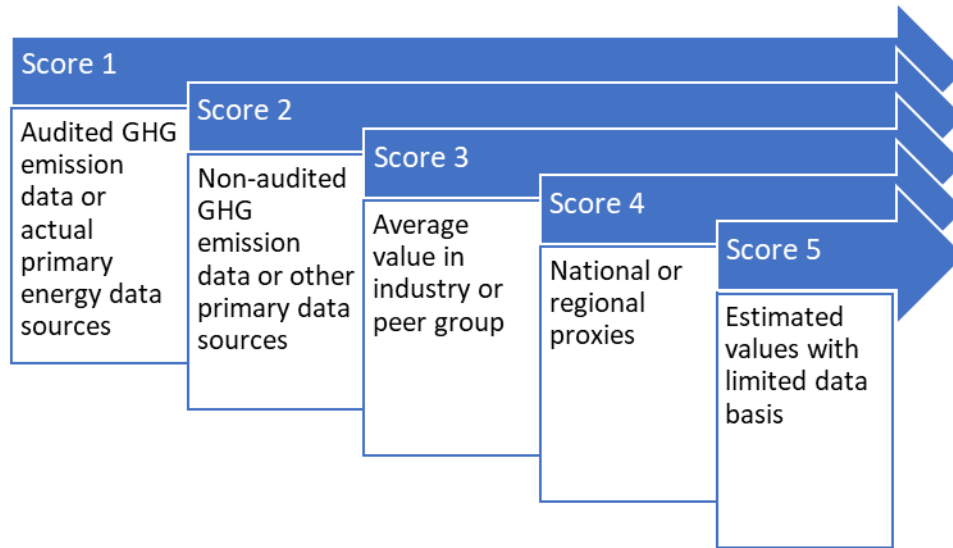
Implications of the score: The DQS informs users about the degree of confidence they can place in the calculated financed emissions.

Continuous improvement: The DQS is not just a static indicator, it is intended to encourage financial institutions to increase the accuracy of the data they use and improve their emissions calculations over time. As funded companies also disclose more detailed and verified emissions data, financial institutions can review and improve their DQS.

Transparency: By publishing the DQS, financial institutions provide stakeholders with insight into the robustness of their carbon accounting practices. This allows stakeholders to understand potential uncertainties in the reported financed emissions.

Decision-making: Financial institutions can use DQS to prioritize their engagement efforts with the companies they invest in, focusing on those with lower data quality scores to improve the overall accuracy of their emissions calculations.

The diagram below shows the scale of DQS scores where a low score means good data quality and as the score increases the data quality decreases.



In the case of the Group:

Score 2:

- Where emissions have been reported directly by the counterparty in their annual reports

Score 3: Residential Real Estate, Commercial Real Estate

Score 4: Loans to companies, debt and equity instruments

Score 5: Vehicle loans

Score 5.1: For all exposures for which the average intensity by asset class is applied to derive the funded emissions.

The table below shows the funded issues related to the loan and investment portfolio by asset class as at December 31, 2024 and December 31, 2023.

Asset class	Balance sheet Exposure million RON		Financed Emissions thousand tonsCO <sub>2</sub>		Financed Emissions thousand tonsCO <sub>2</sub>		Intensity tonsCO <sub>2</sub> /Million RON		Intensity contribution to the Group average	Weight Data Quality in mil RON	Average Data Quality (1 = high, 5 = low)	Data Quality Contribution to Group average
	2024	2023	Scope 1	Scope 1&2*	Scope 1	Scope 1&2*	Total	Total				
			2024	2024	2023	2023	2024	2023	2024	2024	2024	2024
Loans to companies	35,561	29,744	1,508	235	2,184	432	49.01	81.32	40.82%	145,387	4.0883	34.06%
Commercial real estate loans	1,490	694	-	57	-	27	38.54	82.73	1.34%	4,470	3.0000	1.05%
Vehicle loans	5,373	3,226	311	-	128	-	57.92	39.62	7.29%	26,864	5.0000	6.29%
Mortgage loans	18,678	9,143	-	120	-	220	6.45	13.17	2.82%	56,035	3.0001	13.13%
Loans to financed projects	7,622	2,009	58	23	44	-	10.74	33.68	1.92%	30,783	4.0385	7.21%
sovereigns	69,717	53,542	1,947	-	1,823	-	27.92	34.05	45.59%	139,434	2.0000	32.66%
Equity instruments	799	433	1	0	0	1	2.37	1.46	0.04%	2,896	3.6245	0.68%
Debt Instruments	5,648	5,932	7	1	12	1	1.38	2.20	0.18%	21,042	3.7254	4.93%
<b>Total</b>	<b>144,888</b>	<b>104,722</b>	<b>3,832</b>	<b>438</b>	<b>4,191</b>	<b>683</b>	<b>29.47</b>	<b>44.20</b>		<b>426,911</b>	<b>2.95</b>	

\*emissions collected on the basis of data reported directly by customers for and applied to loans to enterprises, project finance loans, investments in corporate bonds and equity instruments as well as issues collected from the PCAF databases for commercial real estate loans and residential real estate loans

In 2024 the Group revised the classification of exposures into asset classes as defined by the PCAF. This process resulted in a more relevant categorization of exposures according to the use of funds. Thus the changes in the balance sheet exposure in 2024 compared to 2023 also reflect this revision, in addition to the organic growth of the portfolio and that resulting from acquisition processes.

The above analysis shows a decrease in financed emissions intensity by 33% although exposures across all asset classes increased by 38% on average. At the same time, data quality has remained at the average level of around 3 (2.95 in 2024 vs. 2.94 in 2023) as defined by the PCAF scores, due to the significant weight in the eligible portfolio of sovereign exposures for which the score is 2.

Data quality remains at a low level for vehicle loans due to the estimates made for the number of kilometers traveled, which is information that the Group does not currently collect.

The causes of the variation in intensities in 2024 compared to 2023 are:

- Updating sector-specific emission factors, which are determined as the ratio of the average emissions generated by each economic sector to the sector's turnover. The increase in turnover has been greater than the increase in average emissions at the sector level resulting in significantly lower intensities than in 2023. This variation is reflected in the funded issuance related to corporate loans, project finance loans, corporate bond investments and equity instruments, for which we apply these intensities. The calculated intensities refer only to Scope 1 issues.
- Update country-specific emission factors that have decreased compared to the previous year and have influenced the emissions of the government tilt portfolio.

- Update emission factors for commercial and residential buildings reported by PCAF that have decreased from the previous year.
- For the year 2024, emissions from vehicle loans financing electric cars were also estimated. The estimate was based on the GHG emission intensity of electricity generation at the country level, and on an estimated consumption of 15.5 kWh per 100 km traveled. Emission factors estimated by applying a multiplier to the factors calculated for Romania were also used for the exposures granted to entities outside Romania. This multiplier reflects the ratio of GHG emissions per unit of GDP PPP (tCO<sub>2</sub>eq/kUSD/year) of each country in relation to those of Romania. This reflects an update of the methodology since last year when emission factors for Romania were used for all exposures regardless of country.

### Analysis of the climate and transition risks to which BT's customers' activities and financed projects are exposed

Climate change is one of the most pressing global challenges with major economic, environmental and social implications. As a financial institution, our direct environmental impact is relatively small. However, the significant material impact that we do generate is manifested indirectly through the activities that we finance. Financing economic sectors with high greenhouse gas emissions or high exposure to climate risks can amplify the effects of climate change and, at the same time, generate relevant financial risks for the Bank.

In this context, the integration of climate criteria into the funding decision-making process is essential.

#### Corporate lending policy and the ESG flow review

The Lending Policy for Corporate customers regulates the entire lending process of the legal entity clients, including the general aspects related to the analysis of the non-financial aspects of the Bank's clients (sub-chapter Environmental, Social and Corporate Governance (ESG) Risk Analysis). At the same time, the lending policy for corporate customers integrates the list of exposures applicable at Banca Transilvania level.

The ESG analysis is performed using five distinct analysis forms, applicable to clients depending on the proposed exposure. The complexity of the forms increases predominantly with the client's proposed exposure (e.g. a client with a proposed exposure of less than RON 5 million, subject to the ESG screening and endorsement procedure, will complete a simplified form containing questions on compliance with ESG legal requirements - labor and environmental protection, and a client with a proposed exposure of more than RON 25 million will have to fill in a detailed form covering a wide range of topics, including issues related to the company's exposure to climate risks, waste management process, measures to improve consumption, energy efficiency and others).

At BT Group level, Banca Transilvania's subsidiaries are adopting the Banca Transilvania model and developing and implementing their own ESG policies, regulations and standards. The table below shows the situation of the subsidiaries that have adopted a policy or standard for ESG risk management.

<b>Name of the Subsidiary</b>	<b>Type of document</b>	<b>Short description</b>
BT Microfinance IFN S.A	Internal standard on risk analysis	Regulates the ESG review process adopted by BT
BT Asset Management S.A.I S.A	Sustainability policy	Regulates ESG issues applicable at level of the company
BT Direct IFN S.A	Rules of operation of the Environment Committee	Regulates the duties of the ESG committee set up at level of the subsidiary
BT Leasing Transilvania IFN S.A	Internal standard for environmental and social risk management	Regulates the ESG review process applicable at the level of the subsidiary
BT Pensii SAFPF S.A	Policy for assessing the good governance practices of investee companies	Regulates the criteria for good governance practices of investee companies

An ESG officer has been appointed in all subsidiaries whose main responsibility is to develop, implement and update measures, procedures and policies for ESG risk management. At the same time, they are in permanent contact with the members of the ESG Risk Analysis Department, ensuring the subsidiaries' liaison with Banca Transilvania on ESG issues.

### Policy scope and exclusions

Both the Lending Policy for Corporate customers and the ESG Review Flow apply to all corporate customers of Banca Transilvania.

However, certain categories of financial products are excluded from ESG analysis (e.g. credit card applications - excluded products are defined in the ESG Analysis Flow on page 10). The flow also outlines the conditions for ESG approval (proposed exposure, implicit environmental risks, other legal criteria such as the need to obtain an environmental license to operate).

Complex forms (at least 14 questions covering all ESG areas) to be filled in by clients, differentiated by certain exposure thresholds (category 1, exposure less than RON 5 million, category 2, exposure between RON 5 and 25 million, category 3, exposure greater than RON 25 million), category 3, exposure greater than RON 25 million) and differentiated by implicit environmental risk (from very low to very high), are used to collect information on the measures taken by the client to manage ESG issues (such as pollution and measures taken to mitigate or reduce it, record of sanctions, management of waste and energy resources, as well as labor protection issues and governance policies implemented). The forms are continuously developed to meet regulatory and stakeholder requirements.

Based on recommendations made by Banca Transilvania's authorized department, each subsidiary decides how to implement and apply ESG risk assessment procedures for its own clients. For example, BT Microfinanțare IFN SA has also implemented an ESG risk assessment form, applicable in particular to companies with a high environmental risk, which checks legal aspects (existence of an environmental permit and compliance with ISU rules), waste management, climate risk impact, possible anti-discrimination policies and governance experience of the management bodies. It has also successfully implemented an exclusion list that includes at least the same activities as BT's exclusion list. Victoria Bank has also implemented an ESG policy, integrated a simplified form of the ESG risk assessment form, and is in the process of appointing staff responsible for conducting ESG analysis. There is a person responsible for developing and implementing policies to manage ESG risks and opportunities. BT Leasing has implemented an internal policy, integrated the list of excluded activities and implemented an ESG scorecard to concretize the result of the ESG analysis of customers.

The Corporate Lending Policy is approved by the Leaders Committee and falls under the responsibility of all departments involved for the implementation and enforcement of the policy. The ESG Risk Analysis Flow is approved by the Executive Director, Corporate Credit Risk Management Division, and it is the responsibility of the ESG Risk Analysis Department to ensure its implementation.

The policies, regulations and internal rules implemented at the level of each subsidiary are endorsed and approved by the Boards of Directors and the Managing Directors of the subsidiaries.

The EBRD and IFC recommendations and guidelines are used for both the Lending Policy and the ESG Analysis Flow. The ESG Analysis Forms will be updated in line with regulatory requirements and adapted to facilitate the collection of relevant information to be collected and reported.

The ESG policies and procedures implemented and applied at the level of the financial group's subsidiaries are based on the recommendations of external partners (IFC, EY, EBRD and others, as appropriate) and on the recommendations of Banca Transilvania. The measures implemented at the Group level are aligned as much as possible, in order to streamline the process of collecting information at the collective level and to ensure data comparability

The Policy and the Flow are made available to all employees, financial group companies and stakeholders to whom the Bank is required to report. However, the Internal Policies are not made available to all stakeholders and are not public. This also applies to Financial Group companies.

#### Policy implementation

The Bank monitors relevant sustainability factors (waste management, resource use management and any energy efficiency measures implemented by clients, as well as other aspects of the company's environmental impact, workers' rights, workplace accident reporting and corporate governance policies) through ESG forms and analysis of ESG analysis completed by clients.



Responses to these forms are used to assign ESG scores and ESG risk rankings to each client, ranging from very low to very high. Based on the information provided, ESG Risk Analysts can make specific improvement recommendations based on the Risk Opinion. The Risk Opinion is the document that contains the ESG Risk Analyst's final assessment of the client's work and/or the funded project, as applicable.

In order to reinforce efforts to conduct a comprehensive and accurate ESG analysis, regular training is provided to relevant staff (relationship managers, agency heads, credit and risk analysts) on the application of the credit policy provisions and the ESG analysis process.

In 2024, an internal training course was developed that is mandatory for all relevant employees. The course was attended and completed by 1,100 employees.

Training for ESG Risk Analysis staff is provided on an annual basis through various external specialized institutions and organizations (e.g., in 2024, the entire department, along with other relevant functions, participated in the course offered by IFC - Climalab - starting in late 2024, with an extension in 2025). Depending on the needs of each risk analyst, the optimal courses and training programs for professional development have been identified.

At the BT Group level, each subsidiary decides the training plan and the courses its employees must attend. However, Banca Transilvania provides, through the ESG risk analysis department and other relevant departments (e.g. The Green Loans Department), training and guidance to the subsidiaries.

In addition, measures are taken to support and guide the Bank's corporate clients in the implementation, application and maintenance of sustainability measures. This is done by organizing specific courses and workshops in different locations throughout the country. These events aim to promote issues such as energy efficiency and help customers get in touch with specialized companies that can offer them energy efficiency and other services.

In 2024, three such events were held in Iasi, Constanta and Oradea. In addition, a multi-stakeholder event entitled "Financing the Transition to a Climate Neutral Economy" was organized in Cluj Napoca in partnership with the British Chamber of Commerce.

#### Policy effectiveness

The Bank uses an ESG score to assess client performance, derived from the completion of analysis forms. The scoring and risk rating is based on a mathematical calculation that considers the scores obtained by answering the questions.

To date, the Bank has not set targets and objectives through internal policies that apply to the entire corporate client portfolio in terms of ESG risk analysis and, implicitly, circular economy issues (materials used, product outputs, waste). The only sustainable goals and targets set by the Bank are related to its own internal operations (e.g., maximize green energy in energy consumed, reduce fuel consumption,

reduce emissions, reduce waste and/or increase recycling). However, the Bank does monitor issues such as how clients manage their waste and supply chain and, where appropriate, requests information on clients' carbon footprints and makes recommendations for improvement and mitigation.

However, even though the Bank has not set goals and targets for its clients, ESG analysis is in a continuous process of development, and the baseline year against which to assess the evolution of the process is 2022, when ESG analysis will be fully modeled and integrated into credit risk analysis. Until the ESG analysis is developed, the Bank verifies the client's compliance with legal requirements through a different opinion model, which is simpler and has a lower level of detail in the information requested and collected.

### Climate risk analysis

The ESG analysis process implemented at Banca Transilvania also takes into account qualitative aspects of the exposure of BT's customers' activities and/or financed projects to physical and transitional climate risks.

The Bank has developed internally a system for categorizing environmental (including transition and climate), social and governance risks. Based on this system, each activity (reported at NACE code level) is assigned a default risk rating for each factor - the best available sources (studies, publications, official documents, databases, EBRD recommendations) have been used to establish the default risk ratings. The geographical location of the client's business or the geographical location of a project (county level) is also taken into account when determining transition and climate risks. Each ESG analysis includes implicit and analyzed risks.

The process of analyzing climate and transition risks starts with establishing a default risk rating (on a scale from "very low" to "very high") associated with a bank's activity. The Bank has developed an internal tool to determine this risk rating based on historical information available in public databases. It assesses aspects such as wind speed, temperature, precipitation, seismic risk (physical climate risks), CO<sub>2</sub> emission risk, regulatory risk, technological risk, market risk, and reputational risk (transitional climate risks). In order to determine the level of climate and transitional climate default risk, both the activity carried out by the company and the geolocalization of the activity or project financed at county level are taken into account - thus it is possible to differentiate between two companies carrying out the same activity (e.g. cereal cultivation) in different locations (for example, the default risk associated with the activity of cereal cultivation in Galați County is considered "very high", while for the same activity carried out in Cluj County the physical climate risk is considered "medium").

The final (analyzed) level of physical and transition climate risk is determined through the ESG analysis. Four of the five ESG risk assessment forms include at least one question on the exposure of the activity to physical and transitional climate risk and how the impact of this exposure is managed. At present, only qualitative information is collected, but the process is being developed to enable quantitative information to be collected. In the ESG risk assessment form for clients with a proposed exposure of between RON 5 million and RON 25 million, as well as in the form for clients with an exposure of more

than RON 25 million and very low or low default environmental risk, clients are required to provide an answer on the impact of physical and transitional climate risk on the business, and there is also a field for details that the client can use to illustrate the measures in place to manage the impact. There is also a question on the existence of a monitoring/reduction plan and/or consumption improvement plan and on the energy sources used. For clients with an exposure of more than RON 25 million carrying out activities with a significant environmental impact (implicit environmental risk of at least "medium-low"), the granularity of the qualitative information is increased, with questions on the calculation of greenhouse gas emissions, the monitoring of ESG indicators and the preparation of the sustainability report, possible measures implemented for energy efficiency and on water consumption, in addition to the three questions mentioned above.

Following the assessment of the client's response via the form, the ESG risk analyst determines the final physical and transitional climate risk by adjusting (positive or negative) the default risk. Recommendations may also be made to improve and/or mitigate the risks identified by the ESG analyst

Banca Transilvania's corporate customers are informed as early as possible in the lending process about the non-financial information collected by the bank. No clear sustainability targets (e.g. reduction of greenhouse gas emissions) have been set in the client relationship, but the ESG screening process allows recommendations to be made to the client and the implementation of these recommendations is followed up during the course of the relationship. Based on BT's exclusion list, a client may be denied financing if the activity is on the list. In this case, the client will be promptly notified of the financing rejection.

#### Exposure by activity sectors and risk classes by type of climate risk (default risk)

##### Implicit Climate Risk (Physical)

Sectors of activity	Very high	Very Low	Medium	Medium High	Medium Low	High	Low	Total
A -Agriculture, forestry and fishing	12,28%	0,00%	8,98%	19,25%	1,49%	58,00%	0,00%	100,00%
B - Mining and quarrying	0,85%	0,00%	43,38%	39,53%	0,00%	16,25%	0,00%	100,00%
C - Manufacturing	0,00%	0,00%	38,92%	20,69%	29,65%	0,00%	10,75%	100,00%
D - Electricity, gas, steam and air conditioning supply	39,05%	0,00%	22,62%	24,07%	0,00%	14,26%	0,00%	100,00%
E - Water supply; sewerage; waste management and remediation activities	0,00%	0,00%	35,61%	10,21%	17,83%	0,07%	36,28%	100,00%
F - Construction	0,00%	3,73%	18,57%	21,59%	40,83%	6,40%	8,87%	100,00%
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	0,00%	10,40%	34,88%	0,00%	32,03%	0,00%	22,69%	100,00%
H - Transportation and storage	0,00%	0,12%	60,92%	21,07%	9,40%	7,24%	1,25%	100,00%
I - Accommodation and food service activities	0,00%	0,00%	41,82%	27,42%	9,85%	20,91%	0,00%	100,00%
J - Information and communication	0,00%	40,25%	0,00%	0,00%	53,13%	0,00%	6,62%	100,00%
K - Financial and insurance activities	0,00%	76,15%	0,16%	0,00%	20,16%	0,00%	3,53%	100,00%
L - Real estate activities	0,00%	43,45%	0,00%	0,00%	37,23%	0,00%	19,32%	100,00%
M - Professional, scientific and technical activities	0,00%	41,46%	0,00%	0,00%	35,85%	0,00%	22,69%	100,00%
N - Administrative and support service activities	0,00%	23,24%	1,91%	6,49%	50,08%	0,00%	18,29%	100,00%
O - Public administration and defense; compulsory social security	0,00%	41,17%	0,04%	0,01%	25,39%	0,01%	33,38%	100,00%
P -Education	0,00%	42,17%	0,00%	0,00%	21,90%	0,00%	35,93%	100,00%

Q - Human health and social work activities	0,00%	0,04%	22,02%	26,83%	7,72%	43,36%	0,03%	100,00%
R - Arts, entertainment and recreation	0,00%	16,00%	0,00%	0,00%	78,45%	0,00%	5,56%	100,00%
S - Other services activities	0,00%	44,04%	0,00%	0,00%	20,66%	0,00%	35,31%	100,00%
<b>Total</b>	<b>2,46%</b>	<b>20,40%</b>	<b>21,97%</b>	<b>10,78%</b>	<b>24,69%</b>	<b>8,91%</b>	<b>10,79%</b>	<b>100,00%</b>

#### Implicit Climate Risk (Transition)

Sectors of activity	Very high	Very Low	Medium	Medium High	Medium Low	High	Low	Total
A -Agriculture, forestry and fishing	0,00%	0,00%	0,00%	2,73%	97,27%	0,00%	0,00%	100,00%
B - Mining and quarrying	1,05%	0,00%	97,50%	0,00%	1,45%	0,00%	0,00%	100,00%
C - Manufacturing	0,00%	0,00%	27,20%	23,28%	39,28%	10,24%	0,00%	100,00%
D - Electricity, gas, steam and air conditioning supply	0,00%	0,00%	100,00%	0,00%	0,00%	0,00%	0,00%	100,00%
E - Water supply; sewerage; waste management and remediation activities	0,00%	0,00%	95,80%	0,00%	3,34%	0,00%	0,86%	100,00%
F - Construction	0,00%	0,00%	57,44%	23,90%	18,67%	0,00%	0,00%	100,00%
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	0,00%	0,00%	0,00%	0,00%	100,00%	0,00%	0,00%	100,00%
H - Transportation and storage	0,00%	0,00%	82,88%	2,97%	0,00%	0,00%	14,15%	100,00%
I - Accommodation and food service activities	0,00%	0,00%	0,00%	0,00%	53,16%	0,00%	46,84%	100,00%
J - Information and communication	0,00%	0,00%	0,00%	0,00%	48,76%	0,00%	51,24%	100,00%
K - Financial and insurance activities	0,00%	0,00%	0,00%	0,00%	99,27%	0,00%	0,73%	100,00%
L - Real estate activities	0,00%	0,00%	0,65%	0,00%	0,00%	0,00%	99,35%	100,00%
M - Professional, scientific and technical activities	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%	100,00%
N - Administrative and support service activities	0,00%	15,49%	0,00%	0,00%	48,65%	0,00%	35,86%	100,00%
O - Public administration and defense; compulsory social security	0,00%	0,00%	100,00%	0,00%	0,00%	0,00%	0,00%	100,00%
P -Education	0,00%	0,00%	0,00%	0,00%	100,00%	0,00%	0,00%	100,00%
Q - Human health and social work activities	0,00%	0,00%	0,00%	0,00%	100,00%	0,00%	0,00%	100,00%
R - Arts, entertainment and recreation	0,00%	0,00%	0,00%	0,00%	9,07%	0,00%	90,93%	100,00%
S - Other services activities	0,00%	0,00%	0,00%	0,00%	1,15%	0,00%	98,85%	100,00%
<b>Total</b>	<b>0,00%</b>	<b>0,21%</b>	<b>22,11%</b>	<b>5,76%</b>	<b>59,63%</b>	<b>1,39%</b>	<b>10,90%</b>	<b>100,00%</b>

### 2.3. Circular economy

In terms of the circular economy, BT Group has identified a significant risk associated with the sectors it finances, although it does not have a significant direct impact. The risk relates to inefficient waste management across a range of sectors including agriculture, forestry, fisheries, manufacturing, construction and other key sectors. Improper management of chemicals, fuels, oils, filters, batteries, used tires, and construction and demolition waste can lead to environmental contamination, resource depletion, and increased greenhouse gas emissions. These risks, if not properly managed, can result in significant compliance costs for the Group, financial losses related to penalties and remediation, and potential reputational damage to the Bank if it is perceived to be supporting unsustainable practices. There are also direct financial risks associated with the inability of financed companies to repay loans due to high waste management costs or penalties for non-compliance with environmental regulations.

#### Integrating circular economy issues into the ESG analysis workflow

At portfolio level, circular economy issues have been integrated into the Lending Policy for Legal Entities and the ESG Analysis Flow.

The ESG analysis is conducted through five separate analysis questionnaires applicable to clients by exposure. Three questionnaires include questions on waste management. Four questionnaires include questions on the development of a monitoring/reduction/improvement plan for resource consumption and on the energy source used. The most complex form includes questions on waste management (recycling or landfilling), as well as a question on calculating ESG performance indicators, calculating emissions, and preparing a sustainability report. In addition, three of the forms include a question on supply chain management.

Risks related to the management of circular economy issues at the client level are integrated into the environmental risk analysis.

The risks analyzed relate to the adjustment of the implicit risks specific to each client and activity, based on the ESG risk analyst's assessment of the client's responses. Depending on what is observed, the implicit risks may be reduced or increased to reflect as accurately as possible the client's actual situation.

For example, in the case of a company that manufactures furniture, the standard risk is environmental. The ESG risk analyst considers the measures the company has implemented (e.g., it has an ISO-certified environmental management system) as well as the company's environmental track record (events likely to cause accidental pollution). Depending on what is observed, the risk may or may not be adjusted. Specifically, if the company has been sanctioned for non-compliance with environmental regulations, if the technological equipment is very outdated, and if a lack of pollution prevention measures is observed, the analyst will increase the default risk by at least one class (from medium to medium or higher). If the company has implemented effective pollution prevention measures, has an ISO-certified environmental management system, has a positive environmental track record, and has a satisfactory level of

technological equipment (modern, energy-efficient equipment), the analyst may decide to reduce the risk (from medium to medium-low or below). Depending on the specifics of the activity, more significant adjustments may be observed (e.g. if the company does not have a workplace where it carries out its activities, but provides services to third parties, no environmental permit is required and the environmental risk is adjusted accordingly).

So far, none of the forms include questions about the origin of raw materials, but the forms do include questions about waste management. The department responsible for updating the forms aims to update them to include more questions on circularity by 2025.

### Exposure by sectors of activity and risk classes by environmental risk

#### Medium implicit risk

Sectors of activity	Very high	Very Low	Medium	Medium High	Medium Low	High	Low	Total
A -Agriculture, forestry and fishing	0,00%	0,00%	7,52%	9,83%	80,04%	2,61%	0,00%	100,00%
B - Mining and quarrying	93,73%	0,00%	0,00%	0,00%	0,00%	6,27%	0,00%	100,00%
C - Manufacturing	4,83%	0,00%	39,88%	43,33%	0,22%	11,73%	0,00%	100,00%
D - Electricity, gas, steam and air conditioning supply	0,00%	0,00%	0,00%	0,04%	51,03%	48,93%	0,00%	100,00%
E - Water supply; sewerage; waste management and remediation activities	7,82%	0,00%	0,00%	2,84%	0,00%	89,34%	0,00%	100,00%
F - Construction	0,00%	31,74%	8,20%	32,69%	0,00%	18,19%	9,18%	100,00%
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	0,00%	0,00%	1,62%	1,85%	1,00%	3,13%	92,39%	100,00%
H - Transportation and storage	0,00%	0,00%	65,65%	0,00%	0,07%	19,31%	14,97%	100,00%
I - Accommodation and food service activities	0,00%	0,00%	91,52%	0,00%	0,00%	0,00%	8,48%	100,00%
J - Information and communication	0,00%	53,44%	0,00%	0,00%	0,00%	0,00%	46,56%	100,00%
K - Financial and insurance activities	0,00%	32,21%	0,00%	0,00%	0,00%	0,00%	67,79%	100,00%
L - Real estate activities	0,00%	99,35%	0,00%	0,00%	0,65%	0,00%	0,00%	100,00%
M - Professional, scientific and technical activities	0,00%	91,11%	4,71%	0,00%	0,00%	0,00%	4,19%	100,00%
N - Administrative and support service activities	0,00%	37,70%	3,85%	0,00%	0,00%	0,00%	58,45%	100,00%
O - Public administration and defense; compulsory social security	0,00%	0,06%	0,00%	0,00%	0,00%	0,00%	99,94%	100,00%
P -Education	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%	100,00%
Q - Human health and social work activities	0,00%	0,00%	4,31%	0,00%	0,00%	0,00%	95,69%	100,00%
R - Arts, entertainment and recreation	0,00%	9,07%	0,00%	0,00%	0,00%	0,00%	90,93%	100,00%
S - Other services activities	0,00%	7,58%	19,02%	0,00%	0,00%	0,00%	73,40%	100,00%
<b>Total</b>	<b>0,88%</b>	<b>15,61%</b>	<b>14,00%</b>	<b>10,09%</b>	<b>8,68%</b>	<b>7,65%</b>	<b>43,11%</b>	<b>100,00%</b>

# 3


## SOCIAL INFORMATION

The BTFG team

Customers and users of products  
and services

Sustainable financing

### 3. SOCIAL INFORMATION

#### 3.1. The BTFG team

Employees are the engine of the BT Group's development and performance and are at the heart of its sustainable growth strategy. In a dynamic financial environment, the Group constantly invests in the professional development, well-being and diversity of its team, ensuring an inclusive, fair and motivating working environment. BT Group's organizational culture is built on principles of collaboration, innovation and accountability, promoting both operational excellence and a positive employee experience. By implementing continuous training programmes, well-being initiatives and HR policies tailored to today's needs, the BT team remains well prepared and committed to achieving strategic objectives.

#### DR S1-6 - Characteristics of the Undertaking's Employees

In December 2024, the Banca Transilvania Financial Group had a total of 14,669 employees, of which 73% were female and 27% male. At the same time, the average number of employees was 13,793. The increase of approximately 16% in the number of employees compared to the previous year is largely due to the takeover of the OTP Group entities.

In terms of external workers working on the Group's premises, at the end of 2024, the number of external workers was 1,020.

As at 31.12.2024, the number of employees of Group entities operating in the Republic of Moldova does not exceed 10% of the total number of employees at Group level.

Total number of employees	Women	Men	Total
BTFG	10.676	3.993	14.669

Type of employees	Women	Men	Total
Number of permanent employees	9.837	3.747	13.584
Number of temporary employees	839	246	1.085
Number of employees with non-standard working hours	0	0	0
Number of full-time employees	10.532	3.934	14.466
Number of part-time employees	144	59	203

In 2024, the total number of employees leaving the company was 1,657, with a turnover rate of 12.01%.



## Data collection

Employee data has been calculated based on Group employee reports extracted from internal systems. No estimates were used, and the number of employees was reported as headcount. The average headcount has been obtained by analyzing the fluctuations in headcount during the reporting period and has been calculated as the arithmetic average of the number of employees at the end of each quarter.

Both the indicator on the number of employees at the end of the reporting period and the indicator on the average number of employees during the reporting period have been used throughout the statement, where the calculation methodology requires it (e.g. average number of training hours per employee).

## DR ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with business strategy and business model (s)

For the purposes of the dual materiality analysis and the data reported in this chapter, all BT Group employees have been included in the scope of ESRS 2 reporting.

The impacts identified in relation to our own employees reflect BT Group's commitment to providing a safe, fair and inclusive working environment. Providing secure and attractive jobs, supported by competitive pay, contributes to the economic stability of employees and the development of local communities. In this context, collective bargaining plays a key role in ensuring a clear framework of rights and obligations for employees, which has a positive impact on the stability and transparency of employment relationships.

The health and safety of employees is also important, supported by access to medical services and benefits designed to provide long-term protection and stability. In parallel, the BT Group pays particular attention to training and skills development, supporting the professional development of employees through dedicated programs, essential to adapt to a dynamic business environment. Diversity and inclusion remain a priority in the Group's culture and are promoted through equal opportunities policies and a working environment free from harassment or violence. These measures contribute to strengthening a respectful and safe environment, which has a positive impact on the well-being and mental health of employees.

At the same time, BT Group recognizes that there are potential forms of negative impact that require monitoring and proactive action to minimize. Pay differentials and unequal opportunities between employees based on gender can create inequities within the organization and affect motivation and perceptions of internal fairness. Violations of employees' right to privacy can also have a negative impact on employee satisfaction and confidence in their relationship with their employer. Through clear policies

and concrete actions, BT Group aims to minimize the impact of negative effects and to create a balanced, transparent and fair working environment for all employees.

The forms of impact identified may also generate *significant risks* for BT Group, both in terms of its own operations and its relationships with upstream partners. Inadequate training and education processes can leave employees without the necessary skills to carry out their roles effectively, which can lead to decreased productivity, limit innovation and, by extension, affect the company's financial performance. This risk becomes even more critical in the context of the need to adapt to digitization and rapid market transformation. In addition, data privacy and cybersecurity risks are major challenges, and potential data breaches could compromise customers' personal information, affecting their trust and the bank's financial stability. Cyber-attacks also have the potential to disrupt banking operations, which could have a negative impact on BT Group's reputation and position in the market. Therefore, careful management of these risks and the implementation of proactive measures become essential to ensure operational sustainability and security.

*The opportunities identified* in the own workforce provide BT Group with a competitive advantage and support the development of a high-performing and inclusive working environment. Offering attractive remuneration packages enhances the bank's ability to attract and retain top talent, contributing to both enhanced reputation and financial performance. At the same time, supporting a healthy work-life balance creates a positive organizational climate that boosts employee productivity and loyalty, positioning BT as a trusted employer.

Investing in employee health and safety, through prevention and wellness programmes, reduces absenteeism and improves engagement, while reinforcing the bank's image as a responsible employer. BT's commitment to gender equality and fair pay also demonstrates an inclusive approach that encourages diversity and provides equal opportunities for all employees, aligning with the principles of the Diversity Charter.

Facilitating training and professional development is another important opportunity, supporting employee growth and helping to maintain a high level of skills in the organization. These initiatives, integrated into a coherent human resources strategy, not only support workforce development but also strengthen BT Group's position as an industry leader, promoting a sustainable model of growth and innovation.

#### [The material impact on its own workforce that may result from the transition to a green economy](#)

The Group has not identified a material negative impact on employees as a result of the transition to a green economy. This is due to the implementation of training and qualification programmes that support the continuous adaptation of the workforce to changes in the banking and finance sector, in particular those generated by new regulatory requirements for sustainability. These initiatives ensure that employees not only maintain their professional relevance, but also benefit from development opportunities in emerging areas such as managing ESG requirements and integrating sustainability principles into lending policies.

As financial institutions adopt more sustainable practices, new career opportunities are also emerging, particularly in the areas of non-financial reporting, analyzing clients' sustainability performance and implementing specific legislative frameworks. Rather than resulting in job losses, this transition offers the prospect of internal mobility and skills development needed in a changing banking landscape.

To support these transformations, dedicated training programmes are in place to familiarize employees with new reporting requirements, ESG risk analysis and the impact of regulation on financial activities. At the same time, educational programmes are organized to raise sustainability awareness among both executive staff and management. These measures contribute to the effective integration of new compliance requirements, maintaining a stable working environment and providing employees with the tools to proactively adapt to industry developments

### [Supporting employees exposed to specific risks](#)

Within the BT Group, dedicated programmes have been developed to understand and support employees who, due to the nature of their work or lack of experience, may be exposed to higher risks. Young employees, who may find it difficult to manage complex tasks or may be subject to stress and risk of operational errors, benefit from mentoring programs whereby experienced employees guide and support them in their first months of employment. Training and professional development sessions are also organized to improve technical and interpersonal skills.

For employees who work with cash, BT Group provides a safe working environment with clearly established protocols for each action, psychological support when needed and two extra paid days off. Staff in shopping centers, where the workload is high, benefit from specific training programs and additional financial rewards tailored to the requirements of this work environment.

As for front office and call center employees, who are exposed to high levels of stress due to constant interaction with customers, the BT Group has implemented clear internal rules and procedures to effectively manage difficult situations. In addition, they have access to psychological support whenever necessary to prevent burnout and maintain a healthy work-life balance.

### [RD S1-1 - Own workforce policies](#)

[The Group's policies dealing with human resources issues cover all employees, regardless of their position in the company or the type of work performed, and do not include provisions for specific groups of employees.](#)

Employee policies are the foundation of a balanced and responsible relationship between the company and its workforce, ensuring a safe, fair and motivating work environment. They are designed to address identified impacts on employees, minimizing risks and enhancing opportunities for professional and personal development. Through a strategic approach, the implemented policies contribute to creating an

organizational climate based on transparency, respect and inclusiveness, while reinforcing the company's commitment to the well-being and performance of its teams.

### Code of Ethics and Conduct

In the Code of Ethics and Conduct, the company reaffirms its commitment to a fair and inclusive work environment where equal opportunities are guaranteed for all employees. The document sets out clear principles on avoiding any form of harassment and discrimination, promoting mutual respect, diversity and a professional climate based on integrity and fairness. In this way, the company provides a safe and motivating environment in which every employee has the opportunity to develop and contribute to the organization's success.

### Remuneration policy

Within the Group, the Staff Remuneration Policy and the *Internal Rules and Regulations* govern the remuneration principles and form the basis for the development of remuneration policies at the level of all Group subsidiaries. These documents include well-defined principles for promoting respect, diversity and performance within the Group

The remuneration policy is oriented towards generating progress for the Bank and the Group. It seeks alignment with shareholder interests and prudent risk management. Thus, the fundamental principles underlying the remuneration policy within BT Financial Group are:

- long-term performance generation;
- attract and retain the best professionals;
- reward level of responsibility and professional track record;
- ensuring the BT Financial Group's profitability and competitiveness;
- ensuring transparency in remuneration policy;
- respecting the interests of customers.

The main objective of the policy is to encourage teamwork and cooperative relationships between colleagues, to ensure a strong link between remuneration and performance while respecting the interests of customers, to create a reward mentality based on individual and team performance, to attract, retain and motivate employees in key positions as defined in the policy on selection, monitoring, evaluation and succession planning within Banca Transilvania, to be flexible so that it can be quickly adapted to the Bank's objectives, to comply with the legislative framework.

The Bank's Remuneration Policy is endorsed by the Chief Executive Officer and approved by the Board of Directors and is subject to an annual review and updating process or whenever internal or external factors so require. The review process aims to update the policy in line with changes in the banking sector as well as the Bank's short, medium and long-term objectives.

Each subsidiary has developed its own employee remuneration policy, in compliance with the legislative regulations in force, based on the principles defined by the Bank's policy.

#### DR S1-10 – Fair Remuneration

Both in Romania and in the Republic of Moldova, the two countries where BT Group operates, the appropriate minimum wage is regulated by the Labor Code and by Government decisions.

In Romania, Law 53/2003 of the Labor Code regulates the definition of the minimum wage. Every year, the Government issues a decision setting this threshold. For the year 2024, the minimum wage was set at RON 3,700 by Decision 598 of 06/06/2024. In addition, Law 283/2024 aligned the Labor Code to Directive (EU) 2022/2041. In Moldova, the minimum wage threshold for the year 2024 was set at 5,000 Moldovan Lei according to Decision 985/2023.

The BT Group complies with these regulations and remunerates its employees above the legal minimum.

#### RD S1-16 - Remuneration indicators (pay gap and total remuneration)

The ESRS standards for determining gender pay gap focuses on the unadjusted ratio at the level of the Banca Transilvania Financial Group as well as at the level of the credit institution Banca Transilvania based on the gross data reported by the scope entities. It shows only the difference between the average salary levels of female and male staff, expressed as a percentage of the average salary level of male staff. This approach is a simple calculation without any adjustment for other key factors that would have a statistically significant impact in explaining pay differences, such as work experience, job position, performance, geographical location, education and time with the company. Therefore, the unadjusted ratio has very limited significance in this form with little to no accurate insights, being uncorrelated with factors that may provide much more pertinent explanations for the pay gap, apart from the gender element. At 12.31.2024, the ratio at individual level (Banca Transilvania) of unadjusted gender pay gap is 25.9%, and at consolidated level within BTFG is 25.4%.

In order to better reflect the reality of the pay structure at the level of the entities involved, Banca Transilvania has performed a much more detailed analysis of the gender pay gap at the individual and consolidated level, after taking into account all factors in the regression model used (measured by the regression coefficient for the gender variable) with the aim of obtaining an adjusted result that provides a relevant insight into those pay differences that are statistically correlated with the gender pay gap. Deep analysis of the pay gender gap is required in our view not only to allow for further nuancing, but mostly to present a more realistic picture of the status quo which is then to be used for taking steps in further strengthening the company culture and improve employee motivation. Thus, after considering the relevant variables and together with the gender variable and modeling the data at a high level in terms of accuracy, the adjusted gender pay ratio at the individual level (Banca Transilvania) is 6.4%, and at the consolidated level within BTFG is 6.8%. The overall results are presented below:

Entity	Unadjusted gender pay gap 2024	Adjusted gender pay gap 2024
BT	25.9%	6.4%
BTFG	25.4%	6.8%

Also, in the context of ESRS reporting, the annual total remuneration ratio is a key indicator for assessing pay inequalities and promoting transparency within a company. This ratio is calculated by comparing the annual total pay of the highest paid person in the organization to the median pay, calculated based on the pay of all employees after excluding the pay of the highest paid employee, allowing companies to reflect pay discrepancies across the organization, and according to ESRS, it is important that this data is presented in a transparent manner to ensure accountability to stakeholders. It also provides a detailed picture of pay equity and can support strategies to reduce internal inequalities, in line with our sustainability objectives and our company-established equal opportunities policies. Individual and consolidated results are shown below:

Entity	Median (expressed in RON)	Ratio (determined according to ESRS standards)
BT	157.166	82,0833
Banca Transilvania Financial Group	158.164	81,5653

FX Exchange: 1 MDL = 0,25802 RON

In year 2023 the rate was calculated by excluding members with mandates, only employees with individual employment contracts were considered and monthly salary was taken into account. This year the total remuneration in 2024 was taken into account according to the gender pay gap methodology (annualized etc.) and also members with mandates were included (CC, CA was not included). Moldova is still missing from the remuneration rate and the gender pay gap.

### Employee training and skills development policies

Education and training have a significant impact by providing opportunities for developing employees' skills and abilities, thereby increasing the quality and efficiency of their work and contributing to the success of the organization. **The Internal Rules of Procedure** in the bank is the document that regulates, among other things, the training of employees

Through coaching and training, employees can acquire new skills and knowledge that enable them to adapt more easily to changes within the organization and in the external environment. Training and professional development contribute to the development of employees' capacity to innovate, so the Bank has created a number of procedures to support employees in the training process: the **Remote Learning Procedure** and the **Group Teleworking Procedure**. The bank comes to the aid of employees who prescribe specific services and activities, thus the **Procedure on the training of staff providing relevant services under the Markets and Financial Instruments Directive (MIFID II)** was developed in order to comply with the training requirements of BT staff in accordance with the provisions of Law 126/2018, on financial markets and instruments.

The content, teaching methods and the effects of the training programme itself to see if they are in line with organizational objectives and meet the development needs of employees are evaluated by the BT Academy.

At subsidiary level, each entity establishes its own Internal Rules and Regulations, adapted to its needs and operational specificities. In addition, each subsidiary follows and implements training procedures specific to its field of activity, thus ensuring compliance with applicable regulations and the continuous development of employees' skills.

### Gender equality policy

Within the Group, the Equal Opportunities Policy, in place since 2020, provides a clear and well-defined framework for promoting a fair and inclusive working environment. It is intended to guide employees in understanding discrimination and harassment, outlining everyone's responsibilities and the measures available for reporting and dealing with any instances of harassment or exclusion. The policy encourages the correction of attitudes and behaviors that can lead to the marginalization of people, regardless of gender, and highlights the benefits of an organizational culture based on diversity, inclusion and mutual respect. It also sets out clear provisions for the application of the principle of equal opportunities in all aspects of employment, including recruitment, promotion, training, working conditions, pay and social security.

The aspects of diversity, inclusion and equal opportunities describing the behavior that the Bank expects from all its employees are also included in BT's **Rules of Internal Order** and **Code of Ethics and Conduct**.

The **Policy on Equal Opportunities** between men and women and the Rules of Internal Order set out in a very clear manner the forms of discrimination, both direct and indirect, based on sex, sexual orientation, genetic characteristics, age, nationality, race and color, ethnicity, religion, political and social options, disability and family situation or responsibility.

In order to prevent and combat all forms and acts of harassment on the basis of sex and harassment in the workplace, Banca Transilvania is committed to:

- ensure equal opportunities and equal treatment between women and men in employment relationships of all kinds;
- to keep employees permanently informed about their rights in terms of equal opportunities and equal treatment between women and men in employment relations, including by organizing training courses;
- inform the public authorities responsible for implementing and monitoring compliance with legislation on equal opportunities and equal treatment between women and men;
- prohibit and sanction any actions that may lead to harassment in the workplace or on grounds of sex.

At the same time, **the Policy for the promotion of diversity within the management body of BT** sets out how to promote diversity within Banca Transilvania S.A. in the management body (the Board of Directors and the Management Committee).

In 2023, the bank joined the Diversity Charter, reaffirming its commitment to promoting an inclusive and equitable work environment. Continuing this approach, in 2024, the entity became a member of the Diversity Chamber of Commerce, thus reinforcing its active involvement in initiatives that support diversity, equal opportunities and inclusion in the business environment.

#### DR S1-17 – Identified cases of severe human rights issues and incidents

At Group level, Banca Transilvania alone recorded 8 cases of incidents of discrimination. As a result of the investigations carried out, it was found that there were no cases of direct or indirect discrimination or harassment of the complaining employee by the person against whom the complaint was made.

Complaints were received through the following channels:

- 4 complaints received by e-mail sent directly to HR
- 2 complaints forwarded to the designated employee
- 1 complaint sent to superior
- 1 complaint received via Call Center

In addition to the 8 incidents of discrimination, the Group registered two other complaints through the Salt and BT Direct channels. Investigations were undertaken and action taken to address the issues raised. Both situations have been resolved.

During the reporting period, the Group did not record:

- serious human rights incidents,
- complaints lodged with OECD National Contact Points for Multinational Enterprises,
- serious human rights issues and incidents related to their own workforce that are cases of non-compliance with the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises,
- fines, penalties or compensation for damages as a result of violations related to work-related discrimination and harassment,
- fines, penalties or compensation for damages following incidents of human rights violations.



## Specific provisions for the inclusion of vulnerable persons

Within the Rules of Internal Order, there are clear mentions on the protection of breastfeeding mothers recognizing them as a vulnerable category when returning to work. In addition, for employees returning from parental leave, the bank offers a reduction in working time for the first four weeks without affecting their salary entitlements, thus easing their transition back into the work environment. At the same time, in support of vulnerable groups (employees with disabilities), a case-by-case telework procedure is applied, providing flexibility in work organization and ensuring an optimal work-life balance. In accordance with the collective bargaining agreement, disabled employees are granted additional rest leave of at least 3 working days.

### RD S1-9 - Diversity indicators

		Women	Men		Total
Diversity of governance structures	13	29%	32	71%	45

In the case of Banca Transilvania and Victoriabank, senior management is represented by the members of the Management Committee and the Leaders Committee, and in the case of the subsidiaries, by the General Manager and the Deputy General Manager.

### Employee diversity by age

Under 30	3.260
Between 30 and 50	9.733
Over 50	1.676
<b>Total</b>	<b>14.669</b>

### Workplace health and safety policies

At the level of BTFG in Romania, issues related to the occupational health and safety of employees are regulated internally in the **Policy on Health, Safety at Work (HSW) and Emergency Situations (ES)**, under the responsibility of the Physical Security Department. At the level of BT Group companies in the Republic of Moldova, the occupational health and safety management system is carried out in compliance with the legislation in force. The risks of accidents at work are identified and mentioned in the *Workplace Accident Prevention and Protection Plan*, approved annually by of the Chief Executive Officer, which describes the assessed occupational risks and the technical, hygienic-sanitary, organizational or other measures necessary to ensure the safety and health of employees, as well as the human and material resources required to achieve them. The plan may be revised whenever there are

changes in working conditions or new risks. The risk assessment methodology is developed by an external provider of health, Safety and Work consultancy services. Both employees and workers are instructed to report any hazards or situations hazardous to their health and safety by call or e-mail.

### Prevention of work accidents

The Bank has a robust health, safety at work and emergency policy in place since 2008, which is supported by an effective risk management system that ensures employee protection and continuity of operations. The Bank, together with the Group, is committed to maintaining a safe and compliant working environment, ensuring both prevention and rapid intervention in case of need. The Bank's health and safety activity is coordinated by the Deputy General Manager, CRO through the Office for Occupational Safety and Health and Emergencies. The Occupational Safety and Health Committee is established within the Bank to ensure employee involvement in the development and implementation of HSE decisions. The Occupational Safety and Health Committee is composed of 8 employee representatives with specific responsibilities in the field of occupational safety and health, 8 employer representatives with responsibilities in the field of occupational safety and health, the occupational physician contracted by Banca Transilvania, the Chairman of the Committee in the person of the Deputy General Manager, CRO and the worker from the Occupational Safety and Health Office as the Committee's secretary. The duties and functioning of this Committee are those laid down in the specific legislation (H.G. 1425/2006 art. 67) and in the Committee's own Rules. Employee representatives are appointed and elected respectively for a period of 2 years. If one or more employee representatives withdraw from the Committee, they will be immediately replaced by other appointed/chosen representatives. The right to elect employee representatives is a prerogative held exclusively by all employees of Banca Transilvania. The procedure for the election of employee representatives is laid down in the Internal Regulations of Banca Transilvania.

At branch level, a person responsible for prevention and protection in relation to occupational health and safety (OHS) and emergency situations (ES), as well as training/coordination in relation to OHS and ES, shall be designated. The designated person in charge of prevention and protection with regard to occupational safety and health (OSH) and emergency situations (ES) shall implement the instructions received from the Office for Occupational Safety and Health and Emergencies.

## DR S1-14 - Health and safety indicators

All BT Group employees are covered by an occupational health and safety management system.

In 2024 there were no fatalities among its own workforce or workers as a result of work-related accidents or occupational diseases.

In 2024, a total of 11 accidents at work were recorded in the BT Group. Of these, 8 accidents occurred at Banca Transilvania, including 2 minor accidents that did not require the intervention of the Territorial Labor Inspectorate (ITM). Also, since the takeover of OTP Bank, 3 accidents have been reported. There have been no cases of illnesses due to occupational diseases.

As far as workers are concerned, there was only one minor accident at work.

The BT Group's recordable injury rate is 0.50 per 1,000,000 hours worked, reflecting a safe working environment and a low number of workplace injuries. This rate is calculated by dividing the total number of recordable accidents by the number of hours worked and then multiplying by 1,000,000. As a result of the 11 accidents at work, there were 177 lost workdays.

## Framework policies

The Rules Internal of Order, the Equal Opportunities Policy and the Collective Bargaining Agreement are the main pillars of the regulatory framework governing labor relations within the Group. These documents ensure transparency and fairness in pay, facilitate collective bargaining and the improvement of working conditions, as well as work-life balance. They also include measures to prevent workplace harassment and violence, promoting a safe and inclusive environment. By applying to the entire workforce, these regulations contribute to an organizational climate based on respect, fairness and sustainable performance.

## Relevant human rights policy commitments

Banca Transilvania complies with the requirements of the International Labor Organization Conventions ratified by Romania (ratified ILO Conventions) and implemented in the National Labor Code. Therefore, the Bank's permanent priority is to create a fair and equitable working environment characterized by diversity, inclusion and equal opportunities. Furthermore, the Bank's policies are aligned with the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the International Labor Organization's Statement on Fundamental Principles and Rights at Work and those set out in the International Bill of Human Rights.

Respect for fundamental rights is established by the internal framework, which clearly regulates the basic principles of safe and fair working conditions. The Board of Directors is responsible for approving these policies and ensuring that they comply with legal and ethical standards. The Human Resources

Department, assisted by the Nominating Committee and the Remuneration Committee, is responsible for developing, implementing and updating the policies.

In order to verify compliance with working conditions, the Internal Audit Department assesses the correct application of policies. For external audit, the territorial labor authorities are responsible for verifying compliance with applicable legislation.

The fundamental rights of employees are also set out in the Collective Bargaining Agreement and are established in accordance with European legislation transposed into national law. It applies to all employees and provides additional rights and benefits over and above the Labor Code.

At the same time, in order to ensure that employees' right to work is respected, the bank has implemented the Code of Ethics and Conduct, which defines the fundamental principles of employee behavior and labor relations, as well as the human resources policy package, which covers issues related to hiring, salaries, benefits and promotion. In addition, the Diversity and Inclusion Policy ensures equal opportunities and the prevention of discrimination, reinforcing Banca Transilvania's commitment to a fair and inclusive work environment.

In order to respect human rights and respond adequately to situations where they are affected, the Bank has put in place a governance framework in line with the sound principles also imposed by its financing partners (IFC, EBRD), as well as an effective identification, monitoring and redress mechanism.

The whistleblower reporting and whistleblower protection mechanism, the internal application My Alert, is an effective tool that ensures the confidentiality and protection of those who report violations and gives employees the opportunity to report possible abuses. The Human Resources Directorate manages the complaints and harassment referral register, ensuring a clear and structured process for dealing with complaints and referrals.

## DR S1-2 - Processes for engaging with own workforce and worker' representatives about impacts

### Engaging with own workforce

Within Banca Transilvania, the Regulation on the Organization and Functioning of the Employees' Representatives defines the structure of the employees' representatives and, at the same time, facilitates the social dialogue between the employer and the employees through these representatives. Drafted in accordance with the legislation in force, the Regulation aims to formalize the rights and obligations of the elected and specially mandated employee representatives, whose mission is to defend and protect the interests of the employees.

At the level of the Bank and its subsidiaries in Romania, employee interests are promoted and defended by employee representatives. They are elected at a general meeting of the employees by a vote of at least half plus one of the total number of employees. The term of office of employee representatives may not exceed 2 years. In order to fulfill the role of Employee Representative, any employee of Banca Transilvania with an employment contract of indefinite duration may stand as a candidate, and the application shall be made in person.

The last employee election process in Banca Transilvania took place in 2023 and involved voluntary, free candidatures. The Employee Representatives were nominated following the votes of approximately 4,900 colleagues. **7 candidates** out of the total number of those who submitted their candidacies were elected Employee Representatives.

Employee representatives are the interface between the bank and the workforce and have a high degree of involvement in the bank's decision-making process. The role of the employee representatives is to work with the bank to find and implement solutions to help the workforce, so an employee representative is always invited to attend HR committee meetings.

Among their various responsibilities, employee representatives are responsible for collective bargaining negotiations, ensuring that employees' rights are respected and defending employees' interests in terms of wages, working conditions, working hours, job security and other professional, economic and social issues related to employment relations. They also participate in the formulation of internal rules. In addition, they play a crucial role in reinforcing colleagues' proposals and engaging in negotiations with management representatives.

At the level of the Group companies in the Republic of Moldova, the notice period and the provisions for consultation and negotiation with employees are regulated by the legislation in force, the internal regulations and the collective labor contract. The minimum number of weeks of notice given prior to the implementation of significant operational changes (liquidation of the unit or reduction in the number or states of staff at the unit) is 2 months.

Persons working for BTFG under agency contracts are not covered by the Collective Bargaining Agreement.

## BT Employee Experience Index

One of Banca Transilvania's team objectives is to create a pleasant and motivating working environment that supports the professional development of employees, encourages collaboration and facilitates the formation of strong relationships within the organization, regardless of seniority or position.

In order to assess the employee experience, Banca Transilvania has introduced the BT Employee Experience Index (BT EEI), a tool that measures:

- Employee Net Promoter Score (eNPS) - the degree to which employees recommend BT as an attractive place to work;
- The quality of the professional relationship between the managers of Banca Transilvania and the teams they lead.

This measure helps the bank to ensure that all colleagues are properly and fully communicated with, professionally supported and cared for by their managers.

The internal BT Employee Experience Index (BT EEI) survey is a biannual survey with six main objectives:

- measuring the Employer Net Promoter Score (eNPS);
- measuring the quality of interaction between managers and the members of the teams they lead;
- the extent to which Banca Transilvania's strategy is known to the whole team;
- collecting suggestions/recommendations that can increase employee satisfaction;
- measuring the quality of collaboration with colleagues from other departments, based on frequent professional interactions;
- evaluation of the degree of collaboration with departments within the organization, based on the interaction during the year.

The information obtained by analyzing the survey is essential to develop specific initiatives and actions to enrich the employee experience.

The 2024 survey received 8,052 responses. These were analyzed and, based on them, a series of decisions were taken to improve the organizational climate. The participation rate of Banca Transilvania Financial Group employees in the survey conducted between July and August 2024 was 87%..

The results obtained through the BT Employee Experience Index (BT EEI) have provided a clear insight into employee expectations and needs, allowing for the adjustment of motivation and retention strategies. As a result, in 2024, Banca Transilvania implemented a series of measures aimed at improving the employee experience, both in terms of financial benefits, flexibility and pay equity.

- Increase the value of meal vouchers by 33%, starting 01.01.2024;
- Indexation of the salaries of all employees to the inflation index for the year 2023, starting 01.02.2024;
- Conduct an internal job re-grading process from January through June 2024 to ensure a more equitable salary structure;
- Maintain hybrid work schedules, offering the possibility of working from home 10 days a month for employees in less critical positions.

#### Stages of employee involvement

Stage	Involvement through	Type of collaboration	Frequency	Responsible function within the bank
Employee needs analysis	Exit forms	Consultative - collecting feedback	Every time an exit process takes place	Human Resources Committee
Discussions with employee representatives	Meetings with employee representatives	Negotiation & Consultation on specific topics	In need	Employers' representatives
Internal policy decision-making	Joint Committee (Occupational Safety and Health Committee, Human Resources Committee, Nomination Committee, Committee, Remuneration Committee)	Collaborative - direct influence in decisions	Whenever deemed necessary	Human Resources
Continuous monitoring and improvement	BT Employee Experience Index	Evaluative - data-adjusted	Bi-annual	Human resources

The effectiveness of employee engagement is tracked through specific HR indicators such as the BT Employee Satisfaction Index, Employee Net Promoter Score, employee retention rate, participation in internal initiatives, training/workshops.

However, the Group does not have specific mechanisms in place to collect feedback from vulnerable groups. All employees, regardless of category, can respond to and submit complaints, grievances and concerns through the feedback mechanisms described in the internal policies.

#### DR S1-3 - Processes for addressing negative impacts and channels of own workers and workers' representative to raise concerns

Currently, to manage potential negative impacts resulting from gender pay gaps, the company has developed a formal pay gap calculation methodology. The methodology describes the steps required to investigate whether there is a gender pay gap between female and male employees for the same work

or work of the same value (gender pay gap) and what the value of the gender pay gap is. The aim is to identify and quantify the factors contributing to these pay gaps, to the extent that they exist. In the event that the pay gap between male and female staff members in each internally determined category will be greater than 9% and cannot be justified by objective and gender-neutral criteria, the reasons for this gap will be identified and measures will be taken to reduce it within a reasonable timeframe that does not produce further imbalances (including in terms of financial, prudential indicators).

The entity also has robust privacy policies, which are highly transparent and publicly accessible on the official website. In addition, thanks to the rigorous security measures in place, there have been no incidents of data loss, thus ensuring the protection and integrity of the information managed.

In addition, to mitigate other forms of negative impact on employees, the company implements key support measures. Thus, access to psychological counseling is facilitated for employees affected by burnout, a service that enables them to receive professional support to overcome difficult times. Additional training sessions are also organized, focusing on stress management and dealing with difficult customer interactions, which are key to reducing daily pressures and improving professional relationships. In addition, the workload is adjusted by redistributing tasks among employees by hiring additional staff, thus ensuring a better balance and preventing overload of teams. Also to prevent overload, a special emphasis is placed on digitizing as many activities as possible. Many actions done by employees have been taken over by robots. All these actions contribute to a healthier and more productive work environment, where employees feel supported and motivated to perform their tasks successfully.

#### [Specific channels for collecting feedback from own workforce](#)

There are clear and accessible channels for raising concerns and complaints throughout the bank. These mechanisms enable issues to be identified and resolved in an efficient manner, contributing to continuous process improvement and maintaining a fair work environment. Employees have the right to report any perceived discriminatory treatment or behaviors that may amount to harassment.

In the event of a complaint, in addition to the complaint, the employee may submit multiple evidence to prove the issues complained of.

Banca Transilvania offers several options for reporting cases of harassment or discrimination:

- direct referral to the hierarchical superior; Each manager who receives such a referral is obliged to inform the Human Resources Department/designated employee within the Human Resources Department within 24 hours of receiving a complaint;
- direct referral to the designated employee in the Human Resources Department responsible for equal opportunities and equal treatment between women and men, who will provide guidance and assistance; In both of the above situations, the complaining employee may do so in writing or verbally if unable to write, describing the nature of the discrimination/harassment and the



details of the incident, as well as any other information regarding witnesses or other complainants.

- through the internal whistleblower application "MyAlert".

For more complex problems or those requiring a formal approach, there are well-defined formal mechanisms that follow certain steps: filing a written complaint, case report, investigation, complaint resolution

To carry out detailed and objective investigations, a committee will be set up to receive and resolve cases of harassment, made up of at least 3 impartial and objective members with voting rights.

The following will be considered when appointing the committee to receive and resolve cases of harassment: gender balance - equal representation of women and men, ethical and professional conduct of the persons appointed to the committee that will investigate the harassment case. None of the persons directly or indirectly involved directly or indirectly in the reported events may be part of the investigation committee

The parties will be informed in writing of the outcome of the investigation and the action to be taken within 45 working days from the date of the complaint. Whether the complaint is upheld or not, a decision will be taken on how best to manage the working relationship in the future

To carry out internal reporting in conditions of confidentiality, the following channels are available to BTFG staff:

- e-mail address [myalert@btrl.ro](mailto:myalert@btrl.ro). This is a dedicated e-mail address which allows for the confidential reporting of legitimate concerns by staff or others who are entitled to make such reports under the law. Each case received will be analyzed by the members of the Group\_Alert and, if it qualifies under this procedure, will be assigned for investigation, by insertion in the specific application. Messages can be sent from any e-mail address (internal or external). The sender receives a reply message with a unique reference code that it can be used to track the status of this report.
- the internal MyAlert application is the special communication channel, available to the Group staff or, as the case may be, to other persons who can make reports, through which they can draw attention, with the assurance of confidentiality and without fear of being punished, to legitimate and substantial concerns about aspects of the business management framework, such as potential fraud, possible violations of the BT Financial Group Code of Ethics and Code of Conduct, of the Rules of Internal Order or of internal regulations specific to the subsidiaries, as well as violations of the law, including the legal provisions set forth in Law 361/2022. This method is based on a web application available through the intranet page of BT/entity BTFG. The MyAlert application allows the confidential transmission of reports from workstations within the Group. Each alert is assigned a unique reference code, which the reporter can use to track the status of his/her report.

- exclusively for reports concerning the violation of the legal provisions set forth in Annex 2 of Law 361/2022, at the request of the reporting person, this may also be done through a personal meeting. In this case, the person making the report must request the meeting through the above-mentioned channels (myalert@btrl.ro, internal application MyAlert). No later than 7 days after the request, he/she will be informed of the proposed date and location of the report. The face-to-face meeting will take place no later than 15 days from the date of the request made in accordance with the provisions of this paragraph.

At the meeting, the person designated by the Corporate Governance and Litigation Department to receive the report shall, subject to the consent of the person making the report, make a permanent and accessible record of the meeting. The Designated Person shall provide the Reporting Person with an opportunity to review, correct and sign the minutes of the meeting.

If the person making the report does not consent to the transcription or recording of the conversation, he or she will be instructed to report the information in accordance with (i) and (ii) above.

BTFG staff will also be able to carry out external reporting under the conditions provided by law. In this case, external reporting will be carried out using the channels made available to them by the authorities competent to receive such reports and carry out subsequent actions (e.g. Banca Nationala a Romanie, Autoritatea de Supraveghere Financiara).

The well-defined and comprehensive complaint handling process ensures that complaints are processed efficiently. They are received and reviewed by the relevant structures. Irrelevant information is forwarded to the responsible director for decision according to internal rules. Relevant complaints are reviewed by a designated committee, which acknowledges receipt of the report within 7 days and provides feedback within a maximum of 3 months.

At present, the Group does not have a formal process in place to assess the level of employee confidence in these structures and processes as a means of voicing their concerns or needs. However, it recognizes the importance of such an initiative and aims to implement an appropriate mechanism to measure the perception and usage of these channels, thereby contributing to the continuous improvement of their effectiveness and accessibility. At the same time, these mechanisms are popularized through the intranet, internal rules and punctual communications, ensuring clear and constant information to employees.

**The BT Group subsidiaries** have implemented specific measures to ensure an equal opportunities and harassment-free working environment. A chapter dedicated to equal opportunities and harassment policy is included in the Rules of Internal Order (ROI) of each subsidiary.

Each subsidiary either has its own referral channel or has access to the Bank's "My Alert" channels, as follows: Victoriabank, BT Direct, BT Insurance Broker, BT Insurance Broker, Improvement Credit Collection, BT Microfinance use the Bank's channel, while BT Pensions, BT Capital Partners, BT Asset Management and OTP Asset Management, BT Leasing Moldova have their own referral channels.

## Protection against retaliation

The policy on protection against retaliation for persons using the reporting channels is included in the internal whistleblowing procedure and complies with applicable laws. In this regard, any form of retaliation, threat of retaliation or attempted retaliation against the reporting persons is strictly prohibited throughout the reporting process, as well as after its resolution, in accordance with the provisions of Law 361/2022. The Group is committed to protecting the integrity and rights of all individuals who report concerns or needs through these channels, and to ensuring a safe and fair environment for their expression.

## DR S1-4 - Taking action on material impacts on own workforce and the effectiveness of these actions

### Managing the impact on own workforce: action plans and mitigation measures

The Bank has identified and assessed all significant impacts on its own workforce, including working conditions, health and safety, fair pay and prevention of discrimination, using both internal survey mechanisms, audits as well as reporting mechanisms. As a result of these actions, appropriate measures have been implemented, such as improving working conditions, adjusting wage policies and strengthening employee reporting and protection mechanisms. The impact of these actions is constantly monitored through performance indicators, internal feedback and regular audits, with results demonstrating a reduction in complaints and an increase in employee satisfaction

Our responsibility to our employees involves constant attention to the impact the organization has on them. The way we address and ameliorate the various challenges that arise in the relationship with the BTFG team translates into concrete actions taken to support the well-being and professional development of each team member:

- **Adjusting salaries in line with inflation:** in February 2024, BT implemented a significant measure to ensure the financial wellbeing of its employees by indexing salaries in line with the inflation index for 2023.
- **Investing in extra-salary benefits:** BT recognizes the importance of a comprehensive employee benefits package, including not only salaries, but also private health insurance and voluntary pensions.
- **Retention policies and reducing staff turnover:** Between February and September 2024, BT participated in the Visa Facilitation Programme, in collaboration with the Chamber of Commerce of the US Embassy in Romania, benefiting 239 employees. This programme supports international mobility and contributes significantly to strengthening BT's brand as a top employer in the labor market. In addition, internal job re-grading efforts, carried out in the first half of 2024, aimed at aligning the salary structure to market levels, promoting fairness and financial sustainability within the company. Thus, at the beginning of 2024, analyzing the results of the salary surveys (PWC and AIMS), the positions within the BT structure were re-graded for grid fit.

- **Safety and wellbeing at work:** BT places particular emphasis on reducing the risk of injury through the implementation of comprehensive safety and wellbeing programmes. One notable example is the wellbeing programme, which focuses on prevention in mental and physical health, developed based on a detailed report that identifies specific risk factors by gender, age and prevalent medical conditions.
- **Prevent stress and burnout:** Balancing workload and providing psychological support are priorities for BT, which recognizes the negative impact of stress and burnout on employee productivity and satisfaction. The support programs are designed to provide employees with the resources they need to effectively manage daily pressures.
- **Continuity and professional development plans:** Reducing staff turnover and the continuous development of employees are essential to BT. Development programmes, such as Be the Manager and the Leadership Program, provide managers with the tools they need to excel in their roles, helping to create a strong organizational culture and a solid talent base.
- **Developing skills through continuing education:** BT invests in continuous employee training through courses, workshops and access to online learning platforms. Initiatives such as School Differently in BT underline the company's commitment to financial education and extend it into the community.
- **Internal mobility programmes:** The BT Career Plan and initiatives such as BT Bridge are designed to provide employees with opportunities to explore new roles and responsibilities, promoting a culture of internal growth and job satisfaction.
- **Process automation and digitization:** Efforts to automate and digitize processes are crucial for BT, allowing employees to focus on value-added tasks and improve operational efficiency.

The Bank has identified and assessed all significant impacts on its own workforce, including working conditions, health and safety, fair pay and prevention of discrimination, using both internal survey mechanisms, audits, and reporting tools. Following these actions, the measures described above have been implemented.

Within the Bank, we ensure that our human resources practices are designed to protect and support employees, thereby avoiding any possible significant negative impacts.

The effectiveness of actions and initiatives implemented for its own workforce is monitored and evaluated through a structured process based on the collection and analysis of relevant data. Monitoring is carried out through specific KPIs such as: employee satisfaction level - eNPS (Employee Net Promoter Score), turnover rate, compliance with occupational health and safety standards. Effectiveness is assessed through feedback sessions with employees, as well as internal audits to verify the compliance of implemented measures. In addition, analyzing long-term trends and comparing the results with the objectives set allows for continuous adjustment and improvement of policies and initiatives. All these mechanisms ensure a proactive approach to maintain a safe, fair and motivating working environment for all employees.

## Managing workforce risks and opportunities at Banca Transilvania

Within Banca Transilvania, managing material risks related to the workforce is essential to ensure operational continuity and efficiency. Actions planned and underway to mitigate material risk related to training and skills development programs.

The Bank invests in the continuous development of its employees' skills:

- Continuous investment in training and development of employees to improve their skills and enable them to adapt to new technologies and processes
- Organize courses and workshops to develop technical and leadership skills, ensuring a flexible and well-trained workforce.

Through these measures, the Group aims to reduce the risks associated with labor dependency and ensure high operational efficiency.

To capitalize on opportunities for growth and innovation, the Bank implements extensive professional development programmes, which include specialized training, mentoring, as well as upskilling and reskilling initiatives tailored to market needs. Competitive benefits packages are also offered to support employee well-being and motivation. At the same time, organizational development initiatives are undertaken to optimize internal processes and strengthen an organizational culture based on collaboration, performance and innovation.

### Resources allocated to employee development

BT Group annually allocates a significant budget to the Human Resources department in order to implement the necessary measures to help maintain the positive impacts it generates for the team, as well as to mitigate any negative effects resulting from impacts identified as material. The realization of this budget is reflected in the 2024 Financial Statements in the Consolidated Statement of Profit or Loss in the Personnel Expense line, representing approximately 50% of the total operating expenses recorded at the consolidated level.

### RD S1-5 - Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities

The Bank aims to diversify its recruitment by addressing new niches of potential employees, including disadvantaged social groups, to reduce staff turnover in key positions such as front office and call center. In addition, regular online courses on diversity, ethics, safety and anti-corruption are organized, and the MyAlert mechanism ensures confidentiality and the resolution of complaints about unfair treatment. The workspace is adapted to health and safety criteria and security measures comply with internal policies and E&S regulations. Professional development is prioritized through retraining and attractive training programmes, including the launch of an onboarding platform for subsidiaries, which includes materials on sustainability and BT Group's organizational culture.

Objectives are measured through key performance indicators (KPIs) such as:

- eNPS of at least 50 and a minimum 70% participation rate in training programmes;
- at least 40 hours training/year per employee (excluding on-the-job training);
- involving at least 70 students in internship programs;
- volunteering and CSR actions;
- monitoring gender, age and diversity balance within the organization.

Direct involvement of stakeholders in setting objectives is through internal surveys (e.g. ENPS) and structured feedback, helping to identify challenges and opportunities.

Employees become an active part of the process of defining, monitoring and improving the bank's objectives through several well-implemented mechanisms: periodic evaluations and benchmarking, comparing internal results with industry benchmarks, consultations with employee representatives, and annual review of objectives based on performance and market changes.

### 3.2. Customers and users of products and services

DR ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

The Group's business model is designed around meeting the financial needs of consumers and end-users, recognizing the essential role that these stakeholders play in shaping the Bank's operations, products and services. The Group defines consumers and end-users as customers, individuals and organizations that access the Bank's services and products.

Individuals accessing products such as savings and current accounts, loans, mortgages and deposits are the core of the Bank's operations. Their needs drive the design of financial products, digital platforms and service initiatives. The Bank provides services to corporate clients for capital raising and risk management, which impacts other end-users of the funded entities but also focuses on small and medium-sized businesses that are equally dependent on the Bank for funding, advisory services and risk management solutions.

Types of consumers and end-users of the company's products

The Group serves a wide range of consumers and end-users, including individuals, legal entities and small and medium-sized enterprises (SMEs), who use the financial services offered to meet their various economic needs.

- Individuals are a category of customers who benefit from essential financial services such as savings accounts, deposits, consumer loans, mortgages and real estate loans. These services provide them with the possibility to save, invest or access finance for the purchase of a home, thus contributing to their financial stability and security
- Corporate customers include large companies that use the Bank's financial products to manage their cash flow, access financing to expand their business or invest in new growth opportunities. By offering tailored financial solutions, the Bank supports the development and consolidation of business activities at the corporate level.
- SME and Mid Co customers are a strategic segment, playing a key role in the local and global economy. They require flexible financial solutions such as working capital loans, lines of credit, equipment financing or real estate mortgages for the acquisition of commercial premises. By ensuring access to finance and promoting financial inclusion, the Bank contributes to the growth and sustainability of these businesses, facilitating the development of the entrepreneurial environment.

Thus, through the diversity of services offered - from deposits to mortgages to real estate loans - the Group responds to the specific needs of each type of customer, supporting both individual consumers and business development of any size, ensuring fair financial access and promoting financial inclusion.

The types of end-users and consumers that can be affected by the Bank's products and services include both individual and corporate customers and SMEs that depend on accurate and accessible information to make informed financial decisions. These customers rely on the transparency and clarity of the Bank's contracts to fully understand the features, costs and risks associated with the products and services they use. The Bank also identifies and pays particular attention to vulnerable groups among its customers, such as low-income people, retired or young people with no financial experience, rural populations or those at risk of financial exclusion who may be more exposed to financial risks. These groups may have difficulty managing debt or understanding complex products, which can increase their vulnerability to over-indebtedness or adverse financial decisions. Therefore, financial education, increased transparency, and regulatory compliance to ensure fair and responsible interaction with vulnerable customers are the main mitigation mechanisms employed by the Bank

#### Material negative effects at level customers

The Bank offers a wide range of financial products that can have a significant impact on consumers and end-users, both in terms of the benefits and risks involved. These include variable interest loans, which can become a financial burden when market fluctuations occur, high-risk investment products, which can generate substantial losses, and other complex financial instruments that require detailed understanding on the part of users. For example, certain lending products may lead to over-indebtedness or financial difficulties for customers who are not fully aware of the repayment terms, associated costs or the risk of debt accumulation in the event of adverse economic circumstances. In addition, the Bank provides services that may affect the privacy, data protection and rights of users, exposing them to risks related to the security of their financial information. Unauthorized access to data, misuse of personal information or cyber-attacks can compromise customers' financial security and undermine their confidence in the services provided. The Bank therefore ensures that end-users and consumers are informed in a transparent manner about the implications of these products and services and that strict cybersecurity measures and clear data protection policies are in place to prevent risks and ensure a safe and fair financial environment for all Bank customers. The Bank is committed to ensuring full transparency by providing clear and accessible information so that customers can understand in detail the full costs of financial products, the fees charged, the investment risks and the impact that financial decisions may have on their economic stability. This information is presented in simple, easy-to-understand language to prevent wrong choices that could lead to negative financial consequences.

#### Activities that have an impact on BTFG customers

Banca Transilvania's positive impact on the Romanian economy is significant, given its role as the main supporter of the business environment and of the population by financing a wide range of customers. As the largest bank in Romania, BT supports economic development by facilitating access to finance for entrepreneurs, SMEs, corporates and individuals, thus contributing to sustainable economic growth and the creation of new market opportunities. Through financing programmes tailored to customers' diverse needs and strategic partnerships, Banca Transilvania plays an active role in stimulating investment,



innovation and financial inclusion, thus strengthening the resilience and competitiveness of the national economy

The Bank carries out a range of activities that have a positive impact on consumers and end-users, helping to improve financial accessibility and inclusion

- The Group promotes inclusive financial products, such as commission-free bank accounts for low-income people or low-interest loans for start-up entrepreneurs. These initiatives help increase access to finance for vulnerable groups, supporting economic development and reducing financial barriers. Financial education is also a priority, and the Bank offers training programmes for customers focused on effective personal budget management, preventing over-indebtedness and understanding complex financial products.

The Bank also supports SMEs with customized financial solutions and develops sustainable products such as green loans to finance sustainable projects

### Material risks and opportunities

The bank faces material risks related to access to information and access to financial products and services, which can affect consumer trust and loyalty. A lack of transparent and clear communication can lead to misunderstandings, and consumers who do not fully understand the terms and conditions of financial products may make uninformed decisions, increasing the risk of non-performance and complaints. Also, limited access to products due to financial, technological or economic barriers can reduce the customer base, particularly among people in rural areas or those with low digital literacy. However, the Bank is managing these risks by improving the accessibility of information through interactive digital platforms, chatbots and financial education programs, using simplified language in contracts and communications. In terms of identified opportunities, the Group, by facilitating access to products through flexible financial solutions and intuitive mobile apps (My BT Leasing), is attracting new customer segments thereby increasing the use of services. The Bank's strategic approach is built on a sustainable business model, focused on the needs of consumers and end-users

The Bank has not identified any significant risks and opportunities affecting specific groups of consumers, but recognizes the existence of key risks, such as dependence on vulnerable segments. These include older people, who prefer traditional banking services and may find it difficult to use digital platforms, and young people who access financial products without adequate education, which can lead to over-indebtedness.

The Bank has developed customized products to support these segments, including loans with flexible terms for young entrepreneurs and microfinance solutions dedicated to the agricultural sector.

In this respect, part of the Group, BT Microfinance, provides a wide range of loans for

- Small business loans: [\*Small Business Credit\*](#)

- Loans for small businesses in agriculture: [Loans for farmers - Over 5,000 businesses financed](#)
- Loans for small businesses in education: [Loans for schools and kindergartens with European guarantee](#) Loans for schools and kindergartens with guarantee

An important strategic direction is to improve access to financial services in rural and disadvantaged areas by expanding the branch network, developing remote banking solutions and adapting financial products to local needs. The BT Pay and BT Go digital platforms play a key role in this strategy, with BT Go having over 200,000 customers online, over RON 21 billion payments processed and over 40,000 invoices issued through e-Factura functionality, while BT Pay is used by over 3.5 million customers, with over 300,000 Round-up savings accounts and 4.5 million digital cards enrolled.

The Bank also facilitates access to personal loans 100% online and has the most extensive POS network in Romania (~150,000, +17.3% vs. 2023), 1,937 ATMs (+3.8% vs. 2023), of which 651 are multifunctional (+5.6% vs. 2023), and network of 513, in over 180 locations. In addition, the BT Visual Help platform, which allows customers quick access to account, card and transaction information through a digital self-service area, registered over 4 million accesses in 2024, reinforcing the digitalization and efficiency of the Banking services

#### [DR S4-1 – Policies related to consumers and end-users](#)

##### [Policies to manage material impacts, risks and opportunities related to consumers and end users](#)

The Bank's policies on consumer and end-user protection are structured around four main areas, each of which has the role of ensuring a regulated and effective framework for the safety and rights of customers, as well as for the smooth conduct of the Bank's activities.

Through these strategic directions, the Bank aims to create a safe, transparent and inclusive financial environment, thereby strengthening consumer confidence in the services it offers.

Depending on the area covered, all internal documents and frameworks applicable to consumers and end-users may be valid at both Bank and Group-wide level and approved by the Chief Executive Officer or the responsible line managers. These policies are accessible to employees via the Bank's intranet and are published on the Bank's official website and, in the case of subsidiaries, on their platforms.

#### Pillar I: Lending

**The first area is the lending area**, where customers are protected by the **General Terms and Conditions of Business**, applicable to both individuals and legal entities, a document that regulates the general terms and conditions applicable to the relationship between the bank and the consumer. It includes essential information about the products and services offered, fees, contractual rights and obligations, ensuring transparency and compliance with financial regulations in force. **The Internal Lending Rule for Individuals**, the **Lending Procedure for Corporate Customers** and the **Lending Procedure for the**

**Doctors' Division (Divizia pentru Medici)** set out the minimum requirements for lending to individuals and corporate customers, outlining the eligibility criteria and procedural controls for the lending process.

#### Pillar II: Cyber Security

**The second area of focus is information security**, a key area for protecting BT's business, employees and customers. The Bank has developed an extensive framework of information security standards, applicable at both group and individual level, which includes a set of **30 regulations**. These define the essential organizational and technical requirements to ensure a secure and compliant information security environment.

In this context, the fundamental documents governing information security within BT include: the General Payment Services Security Policy, the It Security Regulations Policy, the Information Access Control Policy, the User Access Management Policy, the User Responsibilities Policy, the General Information Security Policy and the Information Classification Procedure. Each of these documents clearly sets out the scope, specific objectives, underlying principles, roles and responsibilities of those involved, and compliance with external requirements imposed by applicable information security regulations

These policies and procedures have been created with the main purpose of ensuring the protection of the Bank and all its activities, as well as its employees and customers, while maintaining a high level of security and compliance. By implementing these measures, the Bank aims to effectively manage the risks associated with cyber threats and prevent any incident that could compromise the confidentiality, integrity or availability of data. At the same time, these measures help to protect the institution's reputation and ensure business continuity, reinforcing the confidence of customers and partners in the services offered by BT.

#### Pillar III: Responsible marketing practices

**The third area of interest focuses on ensuring access to quality information** and promoting responsible marketing practices, which are essential for maintaining a strong and trusting relationship with BT customers. In this context, the Bank is implementing a series of measures and procedures aimed at assessing customer perceptions of the services and products offered, as well as constantly improving the customer experience

A key tool in this process is the **Procedure for Measuring Customer Perception of Service Quality in BT**, which describes in detail the actions and methods used to collect and analyze customer feedback. A key tool in this process is the Procedure for Measuring Customer Perception of Service Quality at BT, which describes in detail the actions and methods used to collect and analyze customer feedback. This procedure aims to assess not only the quality of the Bank's services and products, but also the quality of the interactions between customers and BT employees in the various banking processes. By collecting and interpreting customer opinions, the Bank can determine the extent to which its services meet

customer expectations and needs and take effective action to continuously improve the customer experience.

This procedure aims to assess not only the quality of the Bank's services and products, but also the quality of interactions between customers and BT employees in the different Banking processes. By collecting and interpreting customers' opinions, the Bank can determine the extent to which its services meet their expectations and needs, which enables effective measures to be taken to continuously improve the customer experience.

In addition, the **Group-wide ICT Event Reporting Guidelines** govern the process for the management and reporting of ICT incidents. This instruction sets out how such events are reported, investigated and resolved within the Group, ensuring an efficient flow of information between the relevant structures. Through clear and timely communication of technological incidents, the Bank can minimize their impact on its activities and on customers, thus maintaining a high level of security and operational continuity

#### Pillar IV: Confidentiality

The fourth area applicable at the level of Banca Transilvania Financial Group (BTFG) is the **GDPR regulatory framework**, which concerns the protection and processing of personal data. In compliance with the provisions of the General Data Protection Regulation (GDPR), the Bank and the entities within the Group have implemented several internal regulations aimed at ensuring compliance with the legal obligations regarding the processing of personal data, as well as guaranteeing an adequate level of security for such data. The protection of personal data is essential, given that it includes confidential information subject to professional secrecy in the financial-banking sector.

To ensure rigorous compliance with GDPR regulations, the Group has adopted a set of internal policies and procedures structured along several key lines

- **General rules on the processing and protection of personal data** - These rules establish the general framework for lawful, fair and transparent processing of personal data in all entities of BTFG, ensuring respect for the rights of data subjects and the implementation of appropriate security and privacy measures.
- **Procedures for handling security incidents and personal data protection breach situations** - These procedures define the steps for identifying, reporting, investigating and remediating security incidents that may compromise personal data, as well as for notifying the competent authorities and affected individuals in accordance with legal requirements.
- **Procedures for ongoing employee training** - All employees of all Group entities are subject to regular training programmes on the protection and processing of personal data. These training sessions ensure that staff are always up to date with GDPR regulations, GDPR best practices, and their obligations in relation to the personal data they handle.
- **Strict data confidentiality rules** - Group employees are required to respect the confidentiality of personal information and financial data protected by banking professional secrecy. These rules

impose clear restrictions on the access and use of such data to prevent any unauthorized use or improper disclosure.

- **Rules on the exercise of data subjects' rights** - Individuals whose data is processed by BT or its entities have the right to request access to their data, rectification, erasure or restriction of processing, as well as to object to the use of their data in certain circumstances. The procedures in place within the Group set out how these requests are handled so that they are dealt with in an efficient and GDPR compliant manner.
- **Rules on data processing in direct marketing activities** - Any direct marketing activity carried out by BT or group entities complies with the GDPR rules, which involves obtaining the data subjects' explicit consent, providing clear unsubscribe options and using data only for the stated purposes.
- **Procedures for managing relationships with contractual partners** - BTFG sets out clear data protection requirements for dealing with third parties, including suppliers, partners and collaborators who have access to personal data. Through these regulations, it ensures that all partners comply with the same high standards of data protection required by the GDPR.
- **Data Protection Impact Assessment Procedures** - Where certain processing activities pose a high risk to the rights and freedoms of data subjects, impact assessments are conducted. These assessments allow risks to be identified and mitigated through the implementation of appropriate data protection measures.
- **Data processing activity record-keeping and risk management regulations** - BT and group entities maintain detailed records of personal data processing activities to ensure transparency and compliance with the reporting obligations imposed by the GDPR. Mechanisms are also in place to identify, analyze and mitigate the risks associated with these activities

To ensure transparency in the processing of personal data, the Bank and its affiliates provide data subjects with general and specific information notices tailored to each type of processing. These documents are intended, for example, for customers and contain clear and accessible information on the purpose and use of their data, their rights and the safeguards in place.

By applying this extended regulatory framework, Banca Transilvania Financial Group reaffirms its commitment to comply with GDPR requirements, protect privacy and ensure a high level of personal data security. In doing so, the Bank strengthens the reputation and trust of its customers, partners and regulators by demonstrating a responsible and proactive approach to data protection.

#### [International standards implemented by BT for the safety of customers](#)

Banca Transilvania conducts its activities in accordance with a rigorous set of **international standards and legal frameworks** designed to ensure the protection of consumers and end-users of banking services. By implementing these regulations and guidelines, BT reinforces its commitment to **financial security, data protection, human rights and corporate social responsibility**. The standards adopted ensure a stable and secure environment for customers, partners and employees, contributing to increased transparency, resilience and trust in the financial system

## 1. MiFID II - Investor protection and market transparency

BT operates under the **Markets in Financial Instruments Directive (MiFID II)**, a key European legal framework designed for investor protection and increased transparency in financial markets. MiFID II regulates **investment and trading services**, with the main objectives of **protecting investors**, improving **market transparency** and ensuring **fair and ethical practices** in the interaction between financial institutions and customers. BT's business complies with the requirements of MiFID II, **ensuring that our customers receive safe, transparent financial services that meet the highest standards of investor protection.**

## 2. PSD2 - Enhanced security and innovation in digital payments

BT is rigorously applying the **Payment Services Directive (PSD2)**, which redefines standards in electronic payments and the security of banking transactions. This regulation improves **consumer safety** and promotes **innovation** in the financial sector. BT has integrated PSD2 requirements across **its digital platforms**, ensuring customers **transactions are secure, fast and compliant with European regulations.**

## 3. EBA Guide - Stability and Security in the European Banking Sector

**The European Banking Authority (EBA)** imposes a set of **binding guidelines** on all financial institutions in the EU, ensuring their **stability, security and resilience**. BT complies with **the EBA Guidelines**, applying **rigorous** cybersecurity and data protection **risk management measures, high ethical and compliance standards** designed to protect consumer interests. By directly applying these principles, BT protects its customers against financial and cyber risks, strengthening **confidence in Banking services.**

## 4. DORA - Operational Resilience in the Digital Age

The Digital Operational Resilience Act (DORA) is a key regulation for strengthening the operational resilience of financial institutions in Europe. BT enforces DORA standards by proactively monitoring and managing cyber risks, implementing stringent IT security measures, preventing security incidents and breaches, working with regulators to maintain a high level of consumer protection. By integrating DORA principles into its activities, BT ensures its customers that its digital services are secure, stable and compliant with European regulations.

## 5. ISO Standard 27001 - Informational Security

BT is aligning all its internal information security regulations with the international ISO 27001 standard, which provides a rigorous framework for data protection and cyber risk management. By implementing this standard, BT ensures:

- Protection of customer data and prevention of data leaks;
- Effective control systems to detect and prevent cyber attacks;
- Continuous monitoring and improvement of IT security processes.

This commitment to **information security** ensures that BT proactively protects its customers' data and interests.

## 6. Principles for Responsible Banking - Sustainability and Ethics in the Banking Sector

BT is committed to the **Principles for Responsible Banking (PRB)** in order to align the banking sector with the **Sustainable Development Goals**. In this regard, BT:

- Integrates sustainability criteria into its business strategy;
- Promotes responsible financing and ethical investment;
- Support initiatives that contribute to environmental protection and community development.

By adopting these legal frameworks and international standards, Banca Transilvania demonstrates a firm commitment to consumer protection, financial security and social responsibility. The implementation of these rules in day-to-day activities ensures customer safety, transparency of operations and the development of a stable and ethical banking sector.

BT Financial Group's Code of Ethics and Conduct describes the principles and rules of conduct that all BT Financial Group employees are expected to follow in their dealings with customers. The Group supports the right of consumers to receive clear, accurate and easily accessible information about financial products and services, enabling them to make informed decisions. This commitment includes the transparent presentation of the true costs of loans, available on the Bank's website in the Fees and Services Brochure. At the same time, the Bank assumes its responsibility to protect consumer data by complying with the General Data Protection Regulation (GDPR) and other specific regulations, thus preventing abuse and misuse of personal information.

### Involvement and consultation of consumers and end users

The Bank adopts a well-defined and diversified strategy to ensure effective and continuous communication with consumers and end-users, with the main objective of understanding their needs, concerns and expectations regarding financial products and services.

To facilitate direct interaction with customers, the Bank uses various consultation and feedback collection mechanisms, including indicators such as the Net Promoter Score, which is calculated based on the responses of customers who have transacted at the Bank's branches, and Human Interaction indicators, which reflect the quality of interaction between customers and the Bank's representatives.

The Bank also provides users with multiple channels for submitting suggestions and complaints, including mobile applications, the official website, physical units, social networks and the Contact Center Service by phone call.

Another key aspect of the Bank's strategy is data analysis for continuous optimization of the products and services offered. By monitoring trends in the use of financial products and analyzing customer complaints to identify and remedy systemic problems, the Bank constantly adapts its offerings to consumer needs and expectations.

#### Measures in place to provide or contribute to remedying negative human rights impacts on consumers and end users

The Bank is implementing several concrete measures to address negative impacts on the rights of consumers and end-users in the financial sector, ensuring transparency, protection and effective problem resolution.

To handle complaints about unfair lending practices, unclear fees or data protection issues, the Bank provides customers with dedicated mechanisms, including specialized assistance services through the Bank's Call Center where consumers can request clarifications and quick solutions. The Bank works closely with regulators, such as the National Authority for Consumer Protection (ANPC) and the Center for Alternative Dispute Resolution in Banking (CSALB), to ensure compliance with applicable regulations and to provide consumers with fair and fast solutions to disputes.

In addition, as a signatory to the [Principles for Responsible Banking](#) (UNEP FI - Principles for Responsible Banking), we are committed to aligning our business strategy and practices with the Sustainable Development Goals and the Paris Agreement on Climate Change. This commitment involves respect for human rights, including the UN Guiding Principles on Business and Human Rights, the ILO Statement on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, where relevant to our business.

Given the nature of banking and our relationship with our clients, we focus on preventing and mitigating any risks of non-compliance with these principles through rigorous compliance policies, corporate governance and human rights due diligence

In addition, the Bank regularly publishes a report on alignment with these principles. The report can be consulted [here](#).

During the reporting period, we did not identify any significant cases of non-compliance with the above principles involving the Bank's customers. Monitoring of these issues is carried out on an ongoing basis through the feedback channels made available to customers, the complaints mechanisms and the internal audit process, as well as through regular sustainability and compliance reporting.

#### RD S4-2 – Processes for engaging with consumers and end-users about impact

To obtain an objective and detailed insight into the impact of its products and services, the Bank engages directly with consumers and end-users through regular consultations and independent analysis. To this



end, the Bank uses external consultants and independent surveys, such as those carried out by Kantar Romania, which measure the perceptions of individual customers. These studies allow the level of customer satisfaction to be compared with market benchmarks, providing a clear assessment of the Bank's position in relation to the competition and the macroeconomic context.

In the retail segment, the Bank ranks second, maintaining the upward trend of the last two years and closing the gap with previous years in terms of Net Promoter Score (NPS). In 2024, the Bank reached a new all-time high on this indicator, recording a score of 66 out of an annual sample of 1,000 respondents, exceeding the 2023 values. The research shows that at the market level, products and services remain the most valued aspects, followed by customer focus. In the case of BT, customers place particular emphasis on the quality of products and services, professionalism of staff and infrastructure, thus positively differentiating itself from the market average. This information enables the Bank to adjust its strategies and continue to improve the customer experience, maintaining high levels of satisfaction and loyalty.

In addition, the Bank collaborates with various relevant organizations and institutions to improve consumer protection and accessibility of financial services. These partnerships include collaboration with entities promoting financial inclusion and financial education (Romanian Banking Association) as well as with financial regulators and supervisors, actively contributing to debates and initiatives aimed at increasing the transparency and safety of banking services.

Aspect	Description								
Stage	Collaboration with consumers and end-users takes place throughout the process of developing and optimizing financial products and services. This includes identifying customer needs and expectations, testing and validating financial solutions, implementing and improving them based on feedback received.								
Type of collaboration	<table border="1"> <tr> <td>Satisfaction surveys</td> <td>Quarterly/Annual</td> </tr> <tr> <td>Focus groups with different segments</td> <td>Periodically when a product is launched</td> </tr> <tr> <td>Independent market studies by external consultants</td> <td>Periodically</td> </tr> <tr> <td>Working with regulators and independent organizations</td> <td>Periodically</td> </tr> </table>	Satisfaction surveys	Quarterly/Annual	Focus groups with different segments	Periodically when a product is launched	Independent market studies by external consultants	Periodically	Working with regulators and independent organizations	Periodically
Satisfaction surveys	Quarterly/Annual								
Focus groups with different segments	Periodically when a product is launched								
Independent market studies by external consultants	Periodically								
Working with regulators and independent organizations	Periodically								
Result and impact	We analyze customer satisfaction and compare with market benchmarks We measure the perceptions of working with BT, the macroeconomic context								
Responsible function	Customer Experience through Service Quality Division that ensures the implementation of experience improvement initiatives The Complaints Department ensures the timely resolution of complaints and complaints received from customers								
Effectiveness of the engagement	<p><b>Net Promoter Score (NPS)</b>, measures customer loyalty and the likelihood of recommending the Bank to others</p> <p><b>Customer Effort Score (CES)</b>, reflects the effort perceived by customers in their interactions with the bank's personnel</p> <p><b>Human Interaction</b>, assesses the quality and effectiveness of direct interactions with staff</p> <p><b>Complaints resolution time</b>, measuring how quickly and efficiently the Bank responds and resolves concerns</p>								

## Integrate customer feedback into product and service development and update processes

Through the Policy on the Approval and Launch/Deployment of a New Product/Modification of an Existing Product, assumed at the level of the Deputy CEO, Retail Banking and Deputy CEO, SME & MidCorporate, the bank ensures that the outcomes of the process are integrated into its overall strategy and the way it addresses the issues raised in the product development process. This approach involves identifying and establishing risk mitigation measures through a structured process of discussing and evaluating potential issues and determining the most effective solutions to minimize their impact. At the same time, the Bank constantly monitors the effectiveness of the measures put in place, ensuring that they produce the desired results or, if necessary, are adjusted accordingly. The process of business analysis, product approval, implementation and launch is structured into clear stages, each of which plays a key role in the successful integration of the product into the overall business strategy, ensuring alignment with market needs and the bank's strategic objectives.

Changes to an existing product can occur as a result of a number of variable factors, including:

- **The identification of unmet needs of** existing or potential customers, i.e. the emergence of new requirements in the market that require adjustments to the Bank's products or services.
- **The emergence of market opportunities** that justify optimizing products to respond more effectively to the demand and competitiveness of the Banking sector.
- **The possibility of offering new facilities to customers**, following the conclusion of specific contracts or agreements with institutions such as FNGCIMM or EIF.
- **Access to external funding or European funds**, which may allow the development of new products and services or the adaptation of existing ones to meet the eligibility and use of these funds
- **Group-wide synergy objectives**, through which the Bank aims to integrate and optimize its services in line with the overall BT Financial Group strategy.
- **The need to comply with legislative or strategic requirements**, which require product adaptations to comply with the regulations in force and to maintain market competitiveness

Proposals to launch or modify products may come from any Bank employee, regardless of their position, whether they work in a territorial unit, a branch or at Head Office. These suggestions may be submitted in various forms - documents, e-mails, telephone calls or other communication channels - and should be directed to the **departments responsible for** the administration of the products concerned or to those managing the relationship with the customer segment targeted by the product in question.

In case of **modification of an existing product or service**, it is mandatory to inform in writing and involve the relevant **Departments** at an early stage, so that the process is managed efficiently and in accordance with internal rules. This rigorous process ensures full risk assessment, optimal integration within the Bank's product portfolio and full transparency in communicating changes to stakeholders.

## Evaluating the effectiveness of engagement processes

The effectiveness of Banca Transilvania's engagement with consumers and end-users is assessed through the constant monitoring of key performance indicators (KPIs), such as the Net Promoter Score (NPS), Customer Effort Score (CES) and Happiness Index (HI).

The Bank also targets complaint resolution time as a key KPI, with response times shorter than those required by legal regulations. For non-payment service complaints, the maximum resolution time is 30 calendar days from the date of receipt, and for payment service complaints, the Bank responds within a maximum of 15 working days, with the possibility of extension up to 35 working days in exceptional circumstances. This approach reflects the Bank's commitment to providing a fast, efficient and customer-focused process, thereby enhancing consumer confidence and satisfaction.

KPI Complex Complaints and Requests:

- Average resolution time (calendar days) - 7 days
  - %resolution 2024 <=7 days – 75%
  - % settlement 2024<= 14 days – 90%

Complaints are handled by a specialized structure - the Complaints Management Service within the Contact Center & Customer Care Division - which analyzes and resolves each complaint individually. This structure monitors the entire process, works with other departments to identify optimal solutions and implements corrective measures to prevent similar problems in the future.

In order to ensure impartiality and to avoid conflicts of interest, complaints concerning a member of staff or collaborator of the Bank may not be handled by the person concerned or by a direct subordinate. In addition, if a staff member receiving a complaint identifies a possible conflict of interest, he/she must immediately inform the Complaints Office and his/her line manager and refrain from taking any action related to the referral. If a complaint signals a possible conflict of interest involving members of Banca Transilvania's management, it shall be escalated to the Compliance Risk and Conflict of Interest Management Service of the Compliance Department.

The following complaint options are available to customers:

- **Handing in person the complaint** at any Banca Transilvania branch or office;
- **Transmission in writing** by an address sent to the Bank's head office;
- **Phone call** via the Contact Center Service;
- **E-mail** to a dedicated address for complaints;
- **Online form** available on Banca Transilvania website.

Monitoring and evaluation of the complaints handling process is carried out through a set of specific indicators:

- **Performance indicators**, which measure the effectiveness of complaint handling;

- **Risk indicators**, which identify potential problems in customer relations and consumer protection;

Banca Transilvania has implemented a well-structured system for handling complaints, with the main objective of ensuring an efficient, transparent and legally compliant resolution. The activity is organized in such a way as to respect the rights and interests of the complainants, providing clear, reasoned and documented answers within the legal deadlines

By analyzing these indicators, the Bank aims to identify the common causes of complaints, improve the way complaints are resolved and comply with legal requirements on transparency and consumer protection.

#### [Dedicated channels for customers to communicate their concerns or needs directly to the company for resolution](#)

Consumers and end-users can address complaints through various different channels made available to them including dedicated email addresses, letters addressed to the Bank, through the Bank's website or each subsidiary's website, social media or even in person at the Bank's head office or in each branch.

Continuous feedback mechanisms through digital channels, physical units and online platforms are available to the customers:

- By filling in the contact form on website;
- Via secure messaging from BT24 Internet Banking;
- By call - Contact Center Service: 0264 308 028, \*8028 (can be called from any national landline or mobile network);
- Social Media: Facebook;
- At any BT branch/agency
- In writing, by handed in at any BT branch/agency or sent to our Head Office (Cluj-Napoca, Cluj, Calea Dorobantilor str. 30-36, 400117)
- By scanning dedicated QR codes when visiting agencies or interacting with BT's fleet of machines;
- In app stores (Android, IOS)

#### [Processes by which the company supports or requests channel availability](#)

In the field of payment processors and digital service providers, Banca Transilvania operates from two main perspectives: (1) as an issuer and (2) as a payment acceptor. As an issuer, the services offered by the bank to BT cardholders, be they individuals or companies, enable them to make payments and transactions securely. Payment Acceptor, on the other hand, includes services offered to merchant companies that accept card payments, either through physical POS terminals or online solutions. For both categories of services, the Bank provides customers with complaint mechanisms through several

accessible channels, including in the Bank's branches, through the Call Center or by using a dedicated e-mail address, thus ensuring a transparent and efficient process for resolving complaints.

### Complaints received through reporting channels

In 2024 Banca Transilvania received 10,615 requests related to the processing and protection of personal data (of which 65% related to the processing of this type of data in the Credit Bureau system), of which 4,539 were resolved in favor of the data subjects.

At Banca Transilvania and BT Financial Group entities, the protection of personal data is a fundamental priority. To this end, dedicated individuals have been appointed to fulfill the role of Data Protection Officer (DPO), ensuring compliance with specific regulations and protecting the rights of data subjects. To facilitate transparency and accessibility, the contact details of the DPO are publicly available, enabling consumers and users to effectively exercise their rights regarding the processing of personal data. This approach underlines Banca Transilvania and BT Financial Group's commitment to information security and privacy, providing customers and partners with an environment of trust in managing their personal data. The Personal Data Protection Officer designated for Banca Transilvania can be contacted at the dedicated e-mail address [dpo@btrl.ro](mailto:dpo@btrl.ro) , publicly available on the Bank's website, within the BT Privacy Policy

The situation of GDPR requests received by Banca Transilvania in the period 2021 - 2024 that were resolved in favor of the customers/data subjects is broken down below

	2024	2023	2022	2021
<b>Total no. of requests/complaints regarding the processing and protection of personal data (GDPR requests), which have been resolved in favor of the Customer/ Data subject</b>	<b>4539</b>	<b>3248</b>	<b>3116</b>	<b>4790</b>
GDPR requests received through the Center for Alternative Dispute Resolution in Banking (CSALB)	132 of which 64 settled in favor of the client	136 of which 72 settled in favor of client	75 of which 66 settled in favor of the client	59 of which 52 settled in favor of the client
GDPR requests received via ANPC	15 of which 7 settled in favor of	15 (of which 6 settled in favor of the Client)	10 (of which 9 settled in favor of the Client)	7 settled in favor of the client
GDPR requests received via BNR	1 of which 0 settled in favor of		12 (of which 1 settled in favor of the Client)	1
Complaints about unauthorized access/ disclosure of personal data/ confidential information resolved in favour of clients/ data subjects*	2	1	2	5
Investigation referrals** received from ANSPDCP***	2 (following the transmission by Banca Transilvania of 2 personal data breach notifications)	1	3	3

\*Number of General Data Protection Regulation rights (GDPR requests) resolved in favor of data subjects (includes also exercises of rights in relation to data processed in the Credit Bureau's records). Some of the cases recorded in the internal systems as 'resolved in favor of the customer' are situations where, although not considered justified by the Bank, an attempt was made to offer a solution to the customer.

\*\*Investigation requests are requests for information sent to Banca Transilvania (BT) by this authority, as the case may be, as a result of: the submission by BT of personal data breach notifications under Article 33 GDPR or, as the case may be, following the receipt by the authority of complaints from data subjects complaining about the non-compliant processing/protection of their data by BT/other entities of the BT Financial Group

\*\*\*ANSPDCP: National Supervisory Authority for Personal Data Processing.

\*\*\*\* Settled in the customer's favor does not necessarily imply a mistake by the Bank

At the level of the other entities of the BT Financial Group, in terms of referrals representing requests settled in favor of customers/data subjects concerning the exercise of rights guaranteed by the legislation on the processing and protection of personal data, the situation is as follows:

	<b>2024</b>	<b>2023</b>
BT	1,032 of the registered requests were resolved in favor of the data subject	900 of the registered requests were resolved in favor of the data subject
BT	6 of the registered requests were resolved in favor of the data subject	19 of the registered requests were resolved in favor of the data subject
BTA	none of the registered requests has been resolved in favor of the data subject	18 of the registered requests were resolved in favor of the data subject
BTC	9 of the registered requests were resolved in favor of the	5 of the registered requests were resolved in favor of the
Salt Bank	57 of the registered requests were resolved in favor of the data subject	17 of the registered requests were resolved in favor of the data subject
Victoriabank	4 of the registered requests were settled in favor of the data subject	
BT Leasing IFN	none of the registered requests has been resolved in favor of the data subject	
BT Building BT Investment	no requests have been received	
BT Pensii	only one of the registered requests was resolved in favor of the data subject	
BT Leasing Moldova	no requests have been received	
BCR Chisinau	no requests have been received	
Avant Leasing	1 registered request was resolved in favor of the data subject	

BT Broker	none of the registered requests has been resolved in favor of the data subjects
OTP Bank	
OTP Asset Management	no requests have been received

In 2024, 4 leaks/thefts of personal data likely to create risks for data subjects were detected at the level of BT Financial Group entities, which were managed and notified to the competent supervisory authority.

In handling customer referrals, in accordance with the provisions of the Code of Ethics and Conduct, BT Financial Group employees are obliged to respect **essential principles** such as **honesty, fairness and professionalism**, always acting in the best interest of the customer. They must also provide **accurate, clear and comprehensive information**, avoiding any possibility of misleading, and provide services that take into account the **profile and requirements of each investor**.

[DR S4-4– Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities and taking action on material impacts on consumers and end users and effectiveness of those actions](#)

The Bank has implemented a number of key measures to manage the impact on consumers and end-users, with the main objective of building trust and improving their experience. Key actions include digitization of processes, development of new products to meet customer needs, financial education programmes, providing mechanisms for transparency and customer protection.

[Developing inclusive financial products](#)

The bank offers its customers a range of solutions that support Romanian individuals or entrepreneurs, regardless of their location, income level or business size, facilitating access to financial products and services including people in unbanked areas. As part of the solutions offered by BT for young people, they have the option to choose a youth card with specific dedicated benefits. Thus, with the BT Omnipass card, they benefit from free current account opening and card issuance, free travel abroad insurance, discounts within the Omnipass programme. The criteria for the product: customers must be aged between 14 and 30. BT also has products and services dedicated to children, such as the Kiddo debit card and the BT Pay Kiddo app, with the aim of helping to form positive financial habits with parental guidance.

Our desire is to build a solid foundation for financial education and independence, under the guidance of parents, to provide them with the knowledge and tools to understand and manage money responsibly and intelligently

The Group offers access to financing through dedicated products for a diverse range of corporate clients:

- a. Financing and/or refinancing SMEs with the aim of generating employment and programmes aimed at preventing and/or alleviating unemployment caused by socio-economic crises, climate transition projects and/or other "just transition" considerations (including through the potential effect of SME finance and microfinance). The targeted SME categories are:
  - those located in socio-economically disadvantaged areas\* (country-wide),
  - owned by women,
  - owned by young people,
  - start-ups (newly established, not older than three years),
  - owned by self-employed farmers in socio-economically disadvantaged areas,
- b. For access to healthcare, financing and/or refinancing the construction and/or operation of health care, palliative and/or primary palliative care and/or dialysis and/or oncology facilities:
  - healthcare facilities: private hospitals affiliated to the national system
  - primary care facilities: free primary health care facilities affiliated to the national health system
  - palliative care centers: private palliative care facilities (hospices) affiliated to the national health system
  - Dialysis and oncology facilities: private dialysis and oncology centers affiliated to the national health system
- c. Financing and/or refinancing the construction and/or operation of educational facilities and/or student housing:
  - Education facilities: public education facilities such as schools, universities, student housing and level 3 housing, educational establishments and vocational training centers

\*Socio-economically disadvantaged areas = areas that meet the following criteria: (i) GDP per capita is lower than the national average; (ii) GDP PPS (purchasing power standard) per capita is less than 75% of the EU-27 average

The bank promotes transparency and consumer protection by:

- Multiple reporting channels: complaints can be submitted via e-mail ([investor.relations@bancatransilvania.ro](mailto:investor.relations@bancatransilvania.ro), [sesizariesg@btrl.ro](mailto:sesizariesg@btrl.ro)) or call center
- Clear complaint handling procedures, with shorter deadlines than required by legislation
  - 30 calendar days for complaints not related to payment services
  - 15 working days (extendable to 35 working days) for payment service complaints

The actions are implemented across the Bank's entire network, including both physical and digital environments. The financial education programmes targets vulnerable communities and inclusive



financial products target climate impacted sectors. Consumer protection measures are applied across the financial services value chain.

Each action that the Bank implements for customers has a clear timetable for implementation:

- Financial education programme - ongoing, with annual targets
- Inclusive financial products - gradual development and roll-out, updated based on client feedback
- The malpractice reporting mechanism - annual updates for improvement

To minimize negative impacts on consumers, the Bank implements:

- Continuous review of contract terms for clarity and accessibility
- Partnerships with consumer protection institutions to handle the complaints

The Bank monitors the progress of actions by:

- Performance indicators: Net Promoter Score (NPS), Customer Effort Score (CES) and Human Interaction Score (HI)
- Monitor complaint handling times, keeping deadlines shorter than legal deadlines
- Regular reports on the effectiveness of financial education programmes and use of inclusive products

Financial resources are allocated according to the set budget, with planned investments in digitization and financial education. The Bank seeks to work with authorities and non-governmental organizations to support financial inclusion and accessibility of information for vulnerable consumers

#### [Actions planned or underway to prevent, mitigate or remedy significant adverse effects on customers](#)

Training of employees on the processing and protection of personal data is carried out in accordance with the Procedure on the organization and testing of BT Financial Group employees in the field of processing and protection of personal data (for BT and subsidiaries that have appointed DPOs at the level of Banca Transilvania). The other entities of the Group have appointed DPOs at entity level or, as the case may be, do not meet the criteria requiring them to appoint a DPO.

<b>BT</b>	<b>2024</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>
Total hours of training on data protection completed by employees	35,419	35,706	36,820	22,500

In 2024, at Group level, the total number of hours of training on personal data protection completed by employees was 39,877.

## BT Alert

BT Alert constantly informs BT customers about their account balances, as well as account receipts and payments, via messages on their mobile phones. Customers have permanent control and find out in maximum 15 minutes information about their transactions, so they can act immediately in case of suspicious or undetermined transactions.

24-hour call-center line available on 0264 308 028\* or \*8028\* (numbers can be called from any national network).

For Romanians abroad there is a direct line: 0264 303 303 003\*. Banca Transilvania also offers assistance in English for BT products.

## BT Visual Help

BT Visual Help is an alternative to banking without going to the bank. Banca Transilvania has created [BT Visual Help](#) as a way of digital self-service, that allows you, as an account holder or legal representative of the company, to do it yourself, without having to call the call center.

## Întreb BT

Întreb BT is an online platform, designed as a search engine, with over 2,000 questions and answers about banking, as well as about the products and services of Banca Transilvania Group companies. Thanks to the integration of artificial intelligence, people who search for information using AI Search receive a comprehensive answer to the questions asked online, based on all the details available on Întreb BT on the subject.

## Agentiile BT Dialog

BT Dialog branches offer free, personalized financial advice, from loans, related products or insurance to digital solutions - this is the perfect place for the Bank to have an open dialogue and find personalized solutions for each customer.

[There is currently a network of 46 Dialog agencies, and customers can find their locations directly on the website, in the network section.](#)

## [Measures put in place to provide or enable the remedy of a real material impact](#)

To address the real impact on consumers and end users, the Group has taken concrete steps to ensure easy access to relevant information about the products and services offered. For example, consumers have access to up-to-date information through microsites dedicated to each of the Group's entities, and in BT branches, key information such as the list of fees and charges is available in the customer information booklet.

As far as consumer safety is concerned, Banca Transilvania places particular emphasis on informing and protecting consumers in the digital environment. A **dedicated blog page** has been created, available at [BT Online Safety](#), where key topics related to **fraud, cyber-attacks, online shopping safety, the use of ATMs and the protection of entrepreneurs** against risks in the digital environment are addressed

This page includes a **special section** dedicated to online security **news and updates**, providing up-to-date information on **types of fraud** and ways users can protect their data and bank accounts. In addition, **BT has launched online safety campaigns in 2024**, aimed at raising awareness and providing practical guidance on **protecting against cyber threats**.

Additional initiatives or processes with the primary aim of producing positive impacts for consumers and end users

Since its inception, **Banca Transilvania** has been actively involved in supporting entrepreneurs by providing **affordable financial products and services, financial education and personalized advice**. Through these initiatives, BT has facilitated the development of small businesses and start-ups, ensuring that they receive **clear, transparent and easy-to-understand information** to make responsible financial decisions.

To support entrepreneurs even more effectively, BT has created **dedicated business lines**, helping to build a strong and sustainable entrepreneurial ecosystem. In doing so, the Bank remains **committed to adding value to the communities** in which it operates by offering financial solutions tailored to the specific needs of start-up businesses.

An important pillar of BT's strategy is the continuation of partnerships with international financial institutions (IFIs), such as the European Investment Fund (EIF) and the International Finance Corporation (IFC), the European Bank for Reconstruction and Development (EBRD). These collaborations allow the implementation of programmes with a social component aimed at supporting education, female entrepreneurship and financial inclusion.

In addition, BT integrates into its social finance framework categories of customers in need of **access to essential services** (in line with **SDG 11 - Sustainable cities and communities**) and supports **job creation** (aligning with **SDG 8 - Decent work and growth**). A major objective of the Bank is to **facilitate access to finance for groups that are not normally supported through state aid**, thereby providing wider opportunities for economic growth and sustainable development

For start-ups and entrepreneurs, BT has developed **dedicated financial packages**, which include **special benefits tailored** to the specifics and challenges faced by early-stage businesses. The bank also remains a **valuable partner for national programmes to support entrepreneurs**, helping to strengthen the SME sector and develop competitive and innovative businesses

In addition to financing, **BT continues to support start-ups and small businesses with initiatives that go beyond lending**, promoting entrepreneurship education, digitalization and access to mentoring

networks. These efforts underline BT's role as a **strategic partner** for the Romanian business environment, providing entrepreneurs with the resources they need to grow and contribute to the economic and social development of their communities

Banca Transilvania has strengthened its commitment to sustainability through green lending and financial initiatives, with a significant impact on the economy and the environment. After its first sustainable bond issue of EUR 500 million in November 2023, BT published in September 2024 its first Impact and Allocation Report, and in the same month launched its second sustainable bond issue, a EUR 700 million Senior Non-Preferred 6NC5 MREL-eligible Senior Non-Preferred 6NC5, of which 64% was subscribed by investors with an ESG mandate. Green lending saw accelerated growth in 2024, with green loans to companies totaling RON 1,787 million, up 60% from 2023, and renewable energy project financing advanced 76% year-on-year, alongside a more than 60% increase in financing for special climate projects, including water efficiency.

In the mortgage sector, 5.27% of the loans disbursed in 2024 were green loans (EPC grade A), totaling RON 586 million, and the total retail loan portfolio included green loans amounting to RON 2.26 billion, representing 7.3% of the total. BT Leasing has had a significant impact in supporting sustainable mobility, such that 1 out of 2 finance leases granted in 2024 was for hybrid and/or electric vehicles, totaling almost RON 1,230 million, marking a 54% year-on-year increase, while at the end of 2024, 48% of the total leasing portfolio was for hybrid and electric vehicles

Banca Transilvania continues to strengthen its leadership position in strategic areas such as healthcare and agribusiness through dedicated divisions offering customized financial solutions. The Medical Division (DPM) achieved a market share of 40.06% in December 2024 for open accounts, consolidating its position as a trusted financial partner for healthcare professionals. At the end of 2024, the number of active DPM clients - legal entities - reached 31,933 including large corporates, and new financing production for DPM's legal entities amounted to RON 1.2 billion.

At the same time, the balance of deposits for legal entities amounted to approximately RON 2.9 billion, while the balance of loans granted to them amounted to RON 2.56 billion. In parallel, the Agribusiness division continued to support the development of the agricultural sector, with a market share of 21.28% and a portfolio of 36,319 active customers, including large companies.

In 2024, the Bank provided new financing in Agribusiness amounting to RON 3.99 billion, reflecting a strong commitment to the growth and modernization of this critical sector. The balance of Agribusiness deposits at the end of 2024 stood at about RON 2.61 billion, while the balance of loans extended reached RON 5.9 billion, confirming BT's role as a leading supporter of farmers and agricultural entrepreneurs

#### [Monitoring and evaluating the effectiveness of actions or initiatives implemented for customer](#)

The NPS resulting from responses from customers who transacted in the unit for 2024 is 82.45, and the HI (the Human Interaction indicator measures 3 aspects in the customer- BT colleague interaction:

courtesy offered, complete answers given and the way they responded to the customer's need) 98.24, up versus the previous year (+3.27p). The results are based on more than 100,000 feedbacks (107,528, of which individual customers - 99,065 and corporate customers - 8,463)

Internally, we measure customer satisfaction at different touchpoints - at account opening, after a transaction in the unit, at product level, to find out what customers think about new features of certain applications or even in relation to the whole relationship with BT.

In the transactional study, we find the NPS resulting from a visit to a BT unit - we register a slight decrease compared to 2023 in terms of increasing the response base on e-mail (more objective feedback), as well as in terms of the overall collaboration with the bank compared to the last visit (2023 methodology). Again, there is a difference between the NPS recorded on e-mail and telephone - human interaction leads to a higher NPS (86.9 versus 76.81).

The desk concept implemented in the BT Network, leads to high satisfaction for the second consecutive year. When customers notice the reception (the colleague who greets them, ensuring fast reception and predictability), NPS increases by almost 34 points. Similarly, satisfaction goes up when customers are given alternatives to complete transactions online or at machines (over 40 points).

Implementation of the closed-loop feedback process, resolving/clarifying each actionable feedback has led to the conversion of 72% of passive customers into promoter customers and 35% of detractor customers into promoter customers, another 27% of detractor customers became passive following the resolution of situations mentioned in the feedbacks. In 2024, the situations of more than 8000 customers were resolved in less than one day

#### [Resources allocated to manage material impacts](#)

To ensure equitable access to quality information, relevant financial products and services, and the confidentiality of client information, the Group devotes significant resources to the development and implementation of the measures described above. These resources come both from its own sources and from funds raised through bond issues or by participating in financing programs developed in partnership with international and supranational organizations. This mixed approach ensures the sustainability of the investments needed to effectively manage material impacts and meet our commitments to our customers.

### 3.3. Sustainable financing

Sustainable financing has the potential to generate a long-term positive environmental and social impact, supporting the achievement of the Sustainable Development Goals.

Banca Transilvania developed for the first time the Green Finance Framework ("GFF") in 2022 and will continue to update it in the following years. It covers 8 categories of financing that contribute to positive environmental impact:

#### 1. RE - Renewable Energy - SDG 7 Clean and Accessible Energy

Financing in this category is defined as installation or construction measures implemented by an entity aimed at investing in fixed assets that enable the efficient generation or use of electricity, heat, cooling or any other form of energy from renewable sources, including solar, wind, hydro, biomass, biogas, geothermal, tidal or other similar forms of energy.

In the case of RE equipment the eligible project should directly produce or supply the component that is exclusively for the purpose of producing or supporting RE.

Renewable energy sources: wind - wind; solar - photovoltaic panel systems; water - micro-hydro; biogas (including waste); biomass.

#### 2. EE - Energy Efficiency - SDG 9, Industry, Innovation and Infrastructure

Grants in this category are defined as measures implemented by a company to purchase, replace, redesign, or refurbish equipment, systems, or contract services/products to reduce energy consumption for each unit of service offered by that entity. This includes the use of waste to energy (circular economy) or any measure for the efficient use of energy (or reduction in specific energy consumption) of the system directly impacted by the project initiated, based on minimum requirements:

- a) reducing absolute energy consumption by at least 30%; or
- b) a reduction of greenhouse gas emissions by at least 25,000 tCO<sub>2</sub> e/year, or
- c) a reduction of electricity consumption by at least 50 GWh/year.
- d) appliances and lighting that display an energy efficiency comparison label representing at least 30% of the energy savings compared to the benchmark.

In the case of EE equipment or products, the eligible project should be the manufacture or direct supply of energy efficient technology (equipment or appliances). The EE equipment or product should be verified as energy-efficient based on a representative benchmark in the market of the technology or product sold, or be supplied directly to EE projects (as defined as eligible EE project above). **T - Transport - SDG 11, Sustainable Cities and Communities**

In the transport sector, the following products can be financed: electric or plug-in hybrid cars; energy efficiency for vehicles that will be used to replace existing vehicles using the same fuel. The new vehicles require a 30% improvement in fuel consumption, expressed in miles or kilometers/gallon or liters of fuel, compared to the vehicles being replaced (a condition of funding is the borrower's obligation that the replaced vehicles will be withdrawn/discharged from its business, evidenced by an affidavit that within 12 months it will withdraw/dischARGE from its business the existing vehicles being replaced).

Replacements that involve switching from a gasoline-fuelled vehicle to one that runs on the following fuels automatically qualify: liquefied petroleum gas (LPG); blending gasoline with at least 15% ethanol (CNG); vehicles switching from diesel to biodiesel.

### 3. CV - Green Buildings - 11, Sustainable Cities and Communities

Green buildings are buildings that meet green building standards, such as:

- IFC certificate of excellence in designing for high efficiency (EDGE);
- Leadership in Energy and Environmental Design (LEED) certification;
- US Green Building certificate;
- "BREEAM" certificate for the Building Research Environmental Assessment Method as defined by Building Research;
- bronze, silver or gold issued by the German Sustainable Building Council (DGNB);
- RoGBC or other certifications;
- nZEB certified buildings with pollution standard 10% better (net zero energy building - 10%).

### 4. EA - Water Efficiency, SDG 14, Marine Life and SDG 13, Action for Climate Change

This type of funding represents investments that materially reduce water use per production unit. These projects can be accomplished through a retrofit of an existing facility, a water recycling/reuse project, or a project that will use alternative water sources such as groundwater, desalinated water, or implementation of advanced (tertiary) wastewater treatment on an entity's premises and are investments in fixed assets designed to reduce water consumption, provided that the decrease in water use from baseline meets minimum requirements:

- annual water savings (m<sup>3</sup>/year) from water efficiency projects;
- water use per unit of production (water consumption/tonne, water consumption/night for hotel guests, water consumption/square meter in commercial buildings or shopping malls, water consumption/product equivalent, etc.);
- percentage/age of wastewater discharged;
- evidence of a water management strategy that will lead to minimum 10% reductions in water consumption.

#### 5. ACC - Adapting to climate change - SDG 15, Earth Life

This category refers to funding that aims to reduce the vulnerability of human or natural systems to the impacts of climate change and the risks associated with climate variability by maintaining or increasing adaptive capacity. A climate change adaptation project should reduce the risk, exposure or sensitivity to climate change, increase resilience to climate change, or build problem-solving capacity to develop responses to identified risks, vulnerabilities or impacts.

#### 6. SEF - Special Environmental Financing - SDG 12, Responsible Consumption and Production

This category includes funding that contributes to climate change mitigation but for which greenhouse gas (GHG) reduction calculations cannot be quantified:

- Financing from the previous categories for which greenhouse gas (GHG) reductions cannot be calculated - e.g. working capital financing for energy efficient equipment manufacturers;
- financing providers or users of technologies and services that contribute to climate-smart agriculture by reducing agricultural losses or increasing productivity, thereby directly or indirectly supporting climate change mitigation or adaptation;
- capacity building, training centers, farmer training, research and development, and other agricultural extension and research services that serve to increase the adoption of technologies that contribute to smart agriculture.
- financing companies that carry out certified organic farming;
- reducing GHG emissions other than from energy sources: reducing fugitive emissions, reducing emissions from industrial processes to mitigate the effects of climate change;
- afforestation activities, forest plantations, forest shelterbelts, cross-compliance, biomass certificates, etc.;

#### 7. BF - Blue Financing - SDG 6, Clean Water and Sanitation and SDG 12, Marine Life

Funding with a direct impact on aquatic ecosystems such as oceans, seas, watersheds or water resources, distribution networks or water treatment and purification plants. This funding mainly covers the following projects:

- water supply and treatment sector: investment in research, design and implementation of water efficiency, drinking water supply and water treatment solutions;
- water, ocean/sea friendly products: investments in the value chain, including the production, packaging and distribution of environmentally friendly products that avoid pollution of water, oceans or seas;
- water-friendly chemicals and plastics economic sectors, oceans/seas: investment in research, design, development and implementation of measures to manage, reduce, recycle and treat plastics, pollution or chemical waste in coastal and watershed areas;



- Sustainable maritime transport and logistics in port sectors: investment in research, design, development and implementation of water management and waste reduction measures for maritime transport vessels and ports;
- fisheries, aquaculture and seafood value chain: sustainable production, waste management and reduction measures that meet, maintain or exceed Marine Stewardship Council standards or equivalent IFC approved standards;
- offshore renewable energy installations;
- other (eligible activities in sustainable tourism sectors, etc.).

Banca Transilvania uses the CAFI - Climate Assessment for Financial Institutions application, made available by the IFC (International Finance Corporation), to check the potential of an investment loan to qualify as "green finance". The platform is a tool that helps to determine the climate eligibility of financed projects and to measure their development impact.

Within BT there is the European Programmes and Green Lending Department, specifically created to coordinate and brand the sustainable lending activity. The activities of the department involve:

- identification of sectors/industries, customers, programs and funding opportunities;
- realizing sustainable lending structures, flows and rules;
- know-how transfer to the network and business lines;
- flexible transposition of European/ national regulations/ provisions into rules;
- organizing campaigns and events to promote special products, producing information and materials.

The total volume of financing granted during 2024 under the umbrella of the Green Financing Framework for corporate customers of Banca Transilvania in 2024 amounted to RON 1.788 million, 73% more than during 2023. The main categories under which these financings were granted were projects for renewable energy production, green building construction and special environmental financing, as follows:

<b>Green loans granted in 2024 (RONmn)</b>	<b>2024</b>	<b>%</b>
ER	1,050.3	59%
CV	516.8	29%
WSF	182.0	10%
Other	38.4	2%
<b>Total</b>	<b>1,787.6</b>	<b>100%</b>

Special environmental funding includes funding for equipment for the collection and recycling of waste, including waste from farms, the recovery of parts of waste and its revalorization, equipment such as batteries for energy storage or for stabilizing energy grids, equipment for collecting information on reducing carbon footprint.

As specified in the presentation of the targets under the BT Group's Sustainability Strategy, Banca Transilvania has committed to grant green loans amounting to RON 3.5 billion over the period 2023-2025. In view of the performance recorded during 2023 and 2024, totaling RON 2.8 billion (80% of the target), the target has been revised upwards to RON 5 billion for the period 2025-2027.

Loans granted until December 31, 2024, in number of 734 (+60% compared to the period until December 31, 2023) under the umbrella of the Green Financing Framework reached RON 2,656 million (balance as of December 31, 2024), 35% more than on December 31, 2023.

Beyond its role as the main financier of the Romanian economy, the BT Group considers it essential to constantly dialog with local entrepreneurs and companies in Romania about the opportunities and benefits they can have by accessing green financing products. Thus, BT has continued to organize and host events dedicated to these topics: technical solutions, financing opportunities, green energy production, energy efficiency solutions for companies, while facilitating companies' access to expert knowledge and financial resources. These events reinforce BT Group's commitment to support Romanian entrepreneurs and companies in their transition towards a more sustainable future.

In line with its sustainability strategy, the BT Group issued during 2023 the Sustainable Finance Framework ("SFF"), which enables it or its subsidiaries to issue financial instruments to finance and refinance projects that facilitate the transition to a low-carbon and climate resilient economy and/or have a positive social impact and mitigate social problems. This framework is based on the ICMA Green Bond Principles, ICMA Social Bond Principles, ICMA Sustainable Bond Guidelines, LMA/APLMA/LSTA Green Credit and Social Credit Principles, which provide guidance on the use of funds, the project appraisal and selection process, the management of unallocated funds and reporting.

The categories included in the SFF include green finance, starting from the most representative Green Financing Framework categories, but is complemented by categories that address social issues, such as:

Green categories: green buildings (including green mortgages); renewable energy; clean transportation and environmentally sustainable management of living natural resources and land use;

Social categories: employment generation and programmes aimed at preventing and/or alleviating unemployment caused by socio-economic crises, climate transition projects and/or other considerations for a just transition (including through the potential effect of SME financing and microfinance); access to healthcare; access to education.

With regard to the employment generation category, this is aligned with SDG 8, Decent work and growth, in particular SDG 8.3 - promote development-oriented policies that support productive activities, decent employment creation, entrepreneurship, creativity and innovation and encourage the formalization and growth of micro, small and medium enterprises, including through access to financial services and SDG 8.10 - strengthen the capacity of national financial institutions to encourage and expand access to banking, insurance and financial services for all.

Given the alignment with BT Group's business strategy and market positioning, the Bank has adapted this category that addresses SDG8 in a more granular manner, including the financing of micro, small and medium-sized enterprises (as classified at European level) located in socio-economically disadvantaged areas (NUTS 2 regions with GDP per capita below the national average and GDP per capita below 75% of the European average, including self-employed farmers; start-ups; women-owned or youth-owned businesses).

In terms of the importance of SDG8 in Romania, it should be noted that although Romania's GDP has grown at one of the highest annual rates in Europe, Romania currently has the second lowest GDP per capita in the EU, in addition to the continuing problems of poverty and inequality. In 2020, Romania had a Gini index of equalized disposable income of 34.8 out of 100, the fourth highest in the EU, indicating that inequality continues to be high. Although Romania has seen a modest increase in shared prosperity - just 1% between 2015 and 2020 - around 40% of the core population remains largely excluded from the benefits of this economic development. Half of this segment face unemployment, reflecting persistent structural inequalities in the distribution of opportunities and progress.

Small and medium-sized enterprises in Romania employ 65% of the labor force and account for 99.8% of all non-financial sector companies, which employ 21% of the total population. Romania's €29.18 billion Recovery and Resilience Plan (RRP) and the national share of the Structural Funds (€31.5 billion for the period 2021-27) have the potential to boost the economy. Small and medium-sized enterprises can benefit from both the financial allocation and the RRP reforms. However, access to finance remains an issue for business expansion, especially for SMEs: in 2021, Romania ranked 20th among the EU-27 in the EIF SME Access to Finance Index, representing a constraint in accessing external finance, and had the fourth highest share of enterprises facing financial constraints in the EU in 2022.

Banca Transilvania issued under SFF two sustainable bonds programmes: its first sustainable bond in December 2023, with an allocation of 40% for green finance and 60% for social categories, and the second in September 2024. The first Allocation and Impact Report was issued by Banca Transilvania in September 2024 and includes the impact assessment of the loan portfolio for micro and SMEs, estimating the gross value added and employment supported by providing financing to them. An input-output (I-O) analysis approach was used to estimate the impact on employment and gross value added resulting from supporting micro and SMEs in the Romanian economy.

More details about the Sustainable Finance Framework and related information can be found on the BT website as follows:

- BT Group Sustainable Finance Framework;
- Second Party Opinion
- Allocation and Impact Report
- MSME Impact Report
- Independent Auditor's Limited Assurance Report (ISAE 3000).

The BT Group intends to continue financing micro, small and medium-sized enterprises in Romania, which will increase job creation and support the Romanian economy, and therefore increase GDP growth and reduce poverty in Romania. Banca Transilvania has committed to use EUR 1.2 billion, drawn from international markets, to finance or refinance loans eligible under the CFD criteria.

In terms of sustainable financing for individuals, Banca Transilvania offers its customers products that encourage them to purchase energy-efficient real estate (green mortgages), as well as special offers for credit card holders at partner stores that offer sustainable products.

Thus, during 2024, a total of 1,747 green mortgages worth 587 million lei were granted, representing 13% of the total mortgage loans granted in 2024.

The balance of green mortgages as of December 31, 2024 amounts to RON 2,265 million representing 12% of the total mortgage and real estate loans outstanding as of December 31, 2024. In 2024, approximately 1 in 9 mortgage/real estate loans originated qualify as green mortgages.

Banca Transilvania has also integrated sustainable financing practices in its subsidiaries.

The financing provided by Victoriabank in the Republic of Moldova during 2024, qualified as green loans, aimed to support renewable energy and energy efficiency projects. Victoribank benefited from both the expertise of Banca Transilvania and the assistance of the European Bank for Reconstruction and Development. By December 31, 2024, Victoriabak had supported 33 clients with financing worth RON 85 million, 175% higher than at December 31, 2023.

Through BT Group's leasing subsidiaries, both in Romania and in the Republic of Moldova, green mobility solutions are supported, offering customers the opportunity to purchase electric or hybrid cars. As of December 31, 2024, the number of electric and hybrid cars financed by them, as well as the outstanding amount of the financing granted are detailed below:

Categories	number	Romania		Moldova	
		balance (RONmn)	number	balace (RONmn)	
Electric cars	2,383	208	56	5	
Hybrid cars	13,463	1,495	488	49	
<b>Total</b>	<b>15,846</b>	<b>1,702</b>	<b>544</b>	<b>54</b>	
% of car portfolio	35%	48%	38%	54%	

Sustainable financing is an ongoing process, with objectives that are reviewed in line with the sustainability strategy, so there are no specific time horizons defined for the completion of these actions.

### 3.4. Entrepreneurship and financial education

Entrepreneurship education is of paramount importance for companies as it provides them with the necessary tools to effectively manage resources, minimize financial risks and maximize profit, thus contributing to their long-term growth in a sustainable way. For individuals, financial education is essential as it helps to improve their ability to make informed decisions about savings, investments and spending, contributing to their personal financial stability. By providing such educational resources, the BT Group contributes to the development of a robust business ecosystem, preparing individuals capable of effectively managing their finances and starting sustainable entrepreneurial ventures.

#### STUP

Together with Banca Transilvania, BT Mic is involved in the development and management of the "STUP" concept in Bucharest, a unique project in Romania, a "one stop shop", a true ecosystem for entrepreneurs and aspiring entrepreneurs. The entrepreneurial initiatives and STUP-branded events target both existing entrepreneurs, whether they already have a business relationship with BT Group entities or other financial institutions, and aspiring entrepreneurs in the process of becoming entrepreneurs. Through STUP, BT Small enhances support for startups and micro-enterprises by expanding access to finance, but in particular facilitates access to a wide range of non-financial services offered through partners.

In the area of education, free workshops and seminars are organized daily at STUP for entrepreneurs, or future entrepreneurs, which also enhance the assimilation of information and facilitate networking. For a more applied understanding, a deeper learning process and better business management and coordination, STUP has developed customized learning programmes for the entrepreneurial environment. These are offered free of charge to all entrepreneurs, whether they are BT Group customers or not, some of which are available 24/7 in the STUP online platform.

STUP emphasizes educational programmes, workshops, workshops and community engagement as a means of strengthening ties with the entrepreneurial community. Understanding the needs of entrepreneurs, through a learning and cooperation ecosystem suitable for entrepreneurs and by maintaining direct and constant contact with them, opens up opportunities for new business, strengthens the reputation of the entire BT Group as a supporter of entrepreneurship and aligns with its objectives to support Romania's economy. From this perspective, STUP can be considered the most important entrepreneurial initiative in the country.

Structured on several modules, the educational programmes come with valuable content, bringing business knowledge with a high level of applicability, explained in a way that any entrepreneur can understand. Designed and organized together with leading partners (Ascendis, Trend Consult, Burcash Association, Mavericks), the programmes require a constant involvement of entrepreneurs over several weeks and combine theoretical understanding with practical applications or examples, so that entrepreneurs can apply the concepts presented in their own business. Examples of such programmes

are: the Sprint in Entrepreneurship Programme (6 cohorts in total until the end of 2024), the Sales in Entrepreneurship Programme (4 cohorts), the From Numbers to Money Programme (2 cohorts at Hive), the Digital Marketing - How to attract new customers through digital marketing and performance media programme (2 cohorts).

STUP represents, on the one hand, a commitment to accelerate entrepreneurship-specific educational initiatives and, on the other hand, this ecosystem represents a solid foundation for future initiatives dedicated to entrepreneurs.

In 2024, the number of people who attended STUP's entrepreneurship education events was 8,872.

### Community financial education programmes

#### "FIT - Finance for All"

FIT is the financial education programme for all age and education groups. The FIT - Finance for Everyone project was launched in 2023 by Banca Transilvania, with the ambition to turn FIT into the largest national financial education programme, aiming to contribute to mitigating Romania's deficit with the European Union in terms of financial education and inclusion. Concrete and simple questions in the field of financial education become topics of discussion, with the aim of raising the level of financial literacy of children and young people. Questions such as what it means to save, what you do with the money you put aside and where it ends up, what interest rates are and how they work, or the difference between investing and spending, are answered in simple, easy-to-understand terms.

The bank's planned actions had a significant impact on consumers and end-users, reflected in concrete results. The program "De Toti Bani", an online financial education show, recorded over 100,000 views on YouTube, 50 million views on TikTok and 5 million views on social media, contributing to increasing financial awareness. The FIT Quiz, an interactive platform where participants test their financial knowledge, was taken by 35,000 people, of which 8,500 answered all questions correctly, winning over 150 prizes, including electronic devices and festival passes. The Bank also gave over 200 presentations in schools and colleges across the country, reaching over 25,000 pupils and students, who were given physical financial education kits. 'Finance for Everyone', the largest national financial education programme, was designed to inform consumers about the risks of over-indebtedness and the importance of responsible personal financial management, using both online and offline channels. Relevant information materials, covering topics as diverse as personal budgeting, investments, loans and investment funds, were made available to consumers on the official website of this programme, thus facilitating access to the financial knowledge essential for effective management of one's resources. FIT also developed Edu Fin, an edutainment platform for children and young people, through which financial concepts and topics are covered alongside two characters: Edu & Fin.

In 2024 FIT involved organizing 50 financial education seminars and distributing guides on how to properly manage a personal budget to 100,000 people.

Monitoring shows that 70% of financial literacy programme participants reported a better understanding of financial products and made more informed borrowing decisions within six months.

### School Differently

Through **School Differently**, colleagues from BT's units engage in financial education directly in schools. They are invited directly by their teachers. The initiative is aimed at children aged between 4 and 18 and aims to help young people realize the importance of good money management. Pupils participate directly in school in a variety of interactive learning-by-doing activities, while at the same time being introduced to basic financial concepts in a way that makes sense to their age group. Through financial education activities, pupils will see the consequences of how they choose to spend their pocket money, learn to differentiate between wants and needs, and different money management strategies.

### BT Club

**BT Club** - The Romanian Entrepreneur's Club. Established by Banca Transilvania in 2006, BT Club is an exclusive platform for entrepreneurs interested in business and skills development through access to educational resources and networking opportunities. Members have free access to a wide range of trainings, workshops, webinars, seminars and conferences covering topics ranging from strategic management and employee motivation to sales, human resources and innovative solutions for business growth. The BT Club also facilitates meetings and partnerships with other like-minded entrepreneurs who share the same ideas and values, strengthening a dynamic and supportive community. The Club also offers free consultancy through club partners and the European Programs Department of Banca Transilvania, supporting entrepreneurs in accessing and developing projects eligible for Structural Funds.

### Intreb BT

Intreb BT is an online platform, designed as a search engine, with over 2,000 questions and answers about banking, as well as about the products and services of Banca Transilvania Group companies. Thanks to the integration of artificial intelligence, people who search for information using AI Search receive a comprehensive answer to the questions asked online, based on all the details on Intreb BT about the topic.

- 5.6 million people visited the site in 2024, +13% compared to 2023, setting a new record.
- visitor interest has changed from one year to the next, so the most sought-after information is about products and services.
- 70% of visitors came to the site directly.
- 3 questions, on average, visitors ask through AI Search and stay in the conversation for about 3 minutes.

- from abroad, the site is mainly visited from Germany, UK, Italy, Spain and France. Visits from Moldova have increased year on year.

Banca Transilvania is the first banking institution in Romania to integrate artificial intelligence in its online communication, services and processes, using both Robotic Process Automation (RPA) and Large Language Model (LLM).

#### "Sprint in Entrepreneurship" Programme

Delivered by partners at Ascendis, the program, already completed by 6 cohorts, offers a Business Model Canvas-based "journey" that takes learners through core business areas such as: understanding the market and customers, the sales process, the marketing plan, as well as financial information and calculating business health indicators and cash projection for the period ahead.

#### „Sales in Entrepreneurship” Programme

It offers the opportunity to get to know in depth, at the grass roots, the entire sales process, with the steps, methods and practical techniques of approach, starting from prospecting and qualifying potential customers and identifying their needs. A real "Customer Journey" already delivered in 4 editions by trainers with experience from Trend Consult, plus the practical component of negotiation - behaviors, approach, communication - as well as competitive analysis - identifying the differentiator, the value statement.

#### „From Numbers to Money” Programme

Based on the "Profit First" method, the programme delivered by Eusebiu Burcas - the first independent financial education programme - addresses small and medium-sized companies and provides clarity on medium and long-term business finances, calculation and interpretation of key financial indicators, complete identification of expenses and profit allocation.

The learning model is dynamic, specially designed and very practical, so that participants gain more clarity of the business, understand its financial situation even better, learn how to manage debts and financial resources, what are the differences between CashFlow and P&L and plan for further growth of the business.

#### "How to attract new customers through digital marketing and performance media" Programme

The latest programme of Stup , in the "digital" area, developed in an applied concept and organized in 3 distinct layers, an "open class" followed by 2 workshops and then individual consulting session. It is delivered by Mavericks agency, specialized in performance media and web analytics. It was developed specifically for the STUP community, starting from the identification of business development needs in the digital age and has been received with great interest by entrepreneurs.



The buying stages a customer may be in and the right digital marketing mix, the main online promotion channels and their categorization according to the buying stages.

In addition to these initiatives, the Bank works with educational institutions to promote financial inclusion, helping to create a more equitable economic environment.

### Financial education and youth projects at Victoriabank

#### „A Memorable Day at the Bank” Project

In 2024, Victoriabank's headquarters hosted over 200 children, ready to explore the secrets of banking in an interactive and exciting way, from first graders to teenagers. The Human Resources team devised a tailor-made programme designed to capture the attention and enhance the curiosity of both the students and their accompanying teachers. During the financial education activities, the children learned about the history of banking and banknotes, the structure of a commercial bank, how ATMs work, as well as about money management and digitalized banking.

#### Victoriabank - AIESEC Partnership

In 2024, Victoriabank continued its partnership with AIESEC Chisinau - the largest global youth organization focused on developing leadership and entrepreneurial skills among young people. AIESEC is an international organization run by young people, students and recent graduates of higher education institutions, passionate about global issues, leadership and management. This partnership reflects the joint commitment of Victoriabank and AIESEC Chisinau to support the personal and professional development of young people in Moldova and to actively contribute to the good of the community.

In 2024, although no joint events were organized, the Bank participated in meetings with students as partners, where it presented the opportunities offered by Victoriabank as an employer. Victoriabank employees also held training sessions for young people, sharing their professional experience.

#### Victoriabank - Diez Partnership

In 2024, Victoriabank has started new initiatives by collaborating with the platform [www.diez.md](http://www.diez.md), known for its mission to support young people in Moldova and to be a useful guide in their professional development. Thus, Victoriabank and Diez jointly organized the event "Career Guidance", held in speed-dating format. Students had the opportunity to interact directly with Victoriabank professionals in short, focused sessions. Ten students participated in successive meetings with representatives of the Human Resources, IT, Legal, Audit, Marketing, Operations, Treasury departments. During each session, they asked questions about the professional background of the interlocutors, their work in the bank and the specifics of their field of activity. The event provided valuable practical experience and a genuine learning context for young people interested in a career in banking.

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GOVERNANCE  
INFORMATION

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## 4. GOVERNANCE INFORMATION

### RD G1-1 - Policies on professional conduct and corporate culture

Banca Transilvania's corporate governance framework clearly defines the roles and responsibilities of its administrative, management and supervisory bodies, with the main objective of ensuring ethical business behavior and effective supervision. The strategic leadership of the Bank is exercised by the General Meeting of Shareholders, which has the role of setting strategic organizational objectives and allocating the necessary resources to achieve them. The powers of ordinary and extraordinary general meetings are governed by the specific legislation in force and by the Bank's Articles of Incorporation.

From an organizational point of view, the bank is structured into two main components: the management structure, consisting of the Board of Directors and the Management Committee, and the operational structure, which includes the head office and the territorial network of units. The Board of Directors plays a key role in overseeing the Bank's business and providing strategic direction, while the Management Committee is responsible for operational management, implementing the established strategy and managing the day-to-day business. To optimize performance, the Board of Directors has created specialized committees, such as the Audit Committee, the Remuneration Committee, the Nomination Committee and the Risk Management Committee, which contribute to good governance and effective risk management. The members of the Leadership Committee, including the Chief Executive Officer and Deputy Chief Executive Officers, coordinate the various areas of activity, promoting an organizational culture based on integrity and accountability.

Business ethics and responsibility are fundamental principles guiding the Bank's interactions with stakeholders and society at large. Compliance with ethical standards implies making decisions based on integrity, fairness and transparency in all business practices, while recognizing the impact of activities on employees, customers, suppliers and the community. In this regard,

BT Financial Group has clear policies and procedures governing business conduct. The Board of Directors is responsible for the approval and implementation of the Group-wide Code of Ethics and Conduct, ensuring that the values and principles adopted by employees and management are respected. This Code is aligned with the ethical and professional standards promoted in the financial-banking sector, in accordance with the guidelines and codes developed by the professional associations of which BT Financial Group is a member.

The Code of Ethics and Business Conduct regulates key aspects of business behavior, including the relations with suppliers, political activities, avoidance of conflicts of interest, fair competition, human resources policy and the conduct of employees and management. All employees and members of the governing bodies are required to be aware of and comply with the provisions of the Code, and any misconduct will result in disciplinary proceedings. This document does not replace the Rules of Internal Order (ROI) or the Rules of Organization and Administration (ROA), which detail the activities of each company in the BT Financial Group, including human resources issues.

Compliance with integrity standards and the management of risks associated with non-compliant behavior are monitored by the Internal Audit and Compliance Departments. They carry out regular checks and ensure that internal policies are in line with external regulations, thus contributing to maintaining an ethical and responsible working environment.

At the BT Financial Group level, the fight against bribery and corruption is regulated by the ABC Commitment, also available on the bank's website, which sets out the reporting channels and how to report irregularities. The internal compliance framework includes the Code of Ethics and Conduct, Whistleblowing Policy, Conflicts of Interest Prevention and Management Policy, Procurement Policy and specialized due diligence platforms used for third party reputational screening. All employees and members of management are regularly informed and trained on these policies and are updated on relevant legislative changes.

Within the BT Group, it is strictly forbidden to offer, accept or solicit undue advantage in any form whatsoever, whether in the public or private sector. They are expressly prohibited:

- Receiving money or benefits from clients or third parties for the performance of work duties.
- Granting payments or benefits in contravention of internal laws or regulations.
- Providing incentives for business advantage.

At the subsidiary level, the control of business conduct is twofold. The General Meeting of Shareholders sets the strategic direction, and the subsidiary's management, made up of experts with various qualifications, ensures the rigorous implementation and monitoring of these principles in the operational framework.

#### [The expertise of the administrative, management and supervisory bodies in matters relating to professional conduct.](#)

The members of the Board of Directors of Banca Transilvania have extensive experience in banking, risk management, compliance, capital markets and financial strategy development. Their qualifications and professional backgrounds, available on the Bank's website, are aligned with the requirements of the Group-wide *Policy on the Assessment of the Suitability of Members of the Governing Body*. With international careers and continuous training, they ensure effective governance by adapting to financial market dynamics. Similarly, the members of the Leaders Committee have expertise in key areas such as financial management, audit, SME finance, retail banking, risk, legal compliance and banking IT. Their studies cover areas such as economics, finance, accounting, law, marketing and engineering, contributing to informed leadership.

In 2024, they attended 116 individual training sessions in key areas including anti-fraud, GDPR, sustainability and leadership. Their expertise and leadership are essential to the good governance of BT Financial Group, and skills vary between subsidiaries depending on market specifics.

## Policies in place to manage material impacts, risks and opportunities related to business conduct and corporate culture

In order to manage the material impacts, risks and opportunities related to business conduct and corporate culture, Banca Transilvania and BT Financial Group have implemented a robust framework of internal policies, which include:

1. The Code of Ethics and Conduct - sets out the fundamental principles of integrity, accountability and transparency applicable to all employees and members of management.
2. Policy on assessing the suitability of the members of the management body - regulates the criteria for selection and assessment of the competencies and ethics of the bank's leaders.
3. Commitment against bribery and corruption - defines measures to prevent bribery, corruption and conflicts of interest.
4. Whistleblowing Policy - provides a secure and confidential mechanism for reporting ethical and compliance violations.
5. Conflict of Interest Prevention and Management Policy - provides measures to identify and eliminate conflicts of interest in banking activities.
6. Procurement policy - governs the supplier selection processes to ensure transparency and compliance with ethical standards.
7. Sustainability policy - integrates ESG (environmental, social, governance) criteria into the organizational strategy and culture.
8. Data Protection and Privacy Policy - sets out the rules for protecting the personal data of customers and employees.
9. Information Security Policy - aims to protect IT infrastructure and prevent cyber risks.
10. Rules of Internal Order (ROI) and Rules of Organization and Administration (ROA) - detail the rules of conduct, responsibilities and expectations regarding organizational culture.

These policies are periodically updated and apply to group entities and are communicated on the bank's internal intranet to ensure compliance with ethical standards and a sound corporate culture. The implementation of these regulations governed by the Group Relationship Policy and the Subsidiary Risk Management Framework ensures a sound operational framework, delivering optimal outcomes for customers, shareholders and the business environment.

## Establishing, developing, promoting and evaluating corporate culture

Corporate culture is anchored in the policy framework listed above that defines standards of integrity, professional ethics, social responsibility and transparency. These policies and commitments are regularly updated to reflect both regulatory requirements and changes in the economic and social environment.

The Board of Directors and management play an essential role in developing and promoting the corporate culture by assessing how the core values are implemented and respected at all levels of the company. To ensure understanding and ownership of these principles, regular training programs and training sessions are organized at group level on topics such as, compliance, sustainability and

responsible leadership, GDPR. These programmes are accessible to all employees and are designed to reinforce the organizational principles in day-to-day work. Corporate culture is also promoted through various internal communication channels, including digital platforms, newsletters, regular meetings and feedback sessions, which allow employees to stay up to date with company initiatives and actively engage in the company's development.

To ensure a continuous assessment of corporate culture, the bank uses performance indicators. A key element is the collection of feedback through regular surveys, such as eNPS, which measure employee satisfaction and engagement. In addition, a number of relevant KPIs are monitored, such as the participation rate in training programs, the number of ethical reporting and the level of employee retention. Regular assessments carried out by the Board of Directors and management teams contribute to the analysis of the state of the organizational culture, identify areas for improvement and adjust strategies according to identified needs.

Reward elements include bonuses and promotion opportunities for employees who demonstrate behavior aligned with company values.

#### [Mechanisms for reporting and investigating concerns about illegal behavior or behavior that contravenes the code of conduct or internal rules](#)

Banca Transilvania Financial Group has a clear and effective system for identifying, reporting and investigating unethical or illegal behavior. The company applies a zero-tolerance policy against bribery and corruption, and employees and members of management are not allowed to offer, solicit or accept improper benefits.

In order to report irregularities, Banca Transilvania has implemented a secure internal mechanism that guarantees the confidentiality and protection of those who report problems. Employees can report through the dedicated e-mail address [-myalert@btrl.ro](mailto:myalert@btrl.ro) or through the internal application MyAlert. All cases are analysed by a specialized group and each report is given a unique code for follow-up. Complaints are investigated by competent structures, including the bank's executive management.

My Alert is a confidential reporting channel available to GFBT employees for reporting possible fraud, violations of the Code of Ethics, Internal Regulations or legislation, including Law 361/2022. The application is accessible on the bank's intranet, with each alert receiving a unique tracking code. A face-to-face meeting can also be requested via [myalert@btrl.ro](mailto:myalert@btrl.ro). The procedure ensures the confidentiality and protection of the whistleblowers. Throughout the reporting procedure, as well as after its resolution, any form of retaliation, in accordance with the provisions of Law no. 361/2022, against the persons who have made the report is strictly prohibited.

Shareholders and investors can submit their complaints, grievances by e-mail to [investor.relations@bancatransilvania.ro](mailto:investor.relations@bancatransilvania.ro), as well as through the alternative channels available on the Bank's website. For other categories of stakeholders, complaints are registered through the BT call center. In addition, a dedicated e-mail address has been created for ESG complaints: [sesizariesg@btrl.ro](mailto:sesizariesg@btrl.ro).

The Corporate Governance Department will produce a summary analysis of all registered report and investigated incidents across the BT Group as follows: → Annually, to the Board of Directors in the first quarter of the following year, which will approve the annual report and adopt, if necessary, the necessary global measures for the BT Group; → Quarterly, to the Management Committee; → Whenever necessary, to the Executive Management Committee - in case alerts are of high importance and incidents are reported that may seriously affect the Group's reputation; → Whenever necessary, to the National Bank of Romania - Supervisory Directorate, in case of legitimate and substantial concerns that may affect the safety, soundness and reputation of the Bank.

In addition, for entities whose activity is carried out under the authorization, regulation and/or supervision of the ASF (Autoritatea de Supraveghere Financiara) and which provide non-banking financial services to individuals or legal entities that have the status of consumers, a procedure for receiving and resolving petitions is implemented at the level of each such subsidiary, in accordance with the applicable legal framework. In addition, Banca Transilvania has strict policies on conflicts of interest and public procurement, constantly monitoring compliance with ethical rules.

At the Group level, the issue of conflicts of interest is mainly addressed in the Code of Ethics and Conduct, and is also addressed in all the regulations adopted at the Group level that deal with the issue of compliance risk. It also benefits from a dedicated regulation, namely the Policy for the Prevention and Management of Conflict of Interest Situations at the level of Banca Transilvania S.A. with direct application at the level of subsidiaries. Employees of BT Group companies must complete the conflict of interest statement in the dedicated IT application, including those who do not identify such situations. Employees must inform their line manager and senior management of any existing or potential conflict of interest involving themselves or other employees. The competence for analysis belongs to the different committees as follows:

- **Members of the governing bodies** - Remuneration Committee and Nomination Committee
- Executive Directors and members of the governing body - the Administrative Board
- Managerial staff (e.g. agency, branch managers) - Management Committee
- Executive and lower management - Human Resources Committee

[The same rules apply to subsidiaries. Suspicions of bribery or corruption can be reported 24 hours a day to \[AlertABC@btrl.ro\]\(mailto:AlertABC@btrl.ro\) with the guarantee of protection against retaliation.](#)

### [Investigating incidents of business misconduct](#)

Business ethics and responsibility guide BT Financial Group in its dealings with stakeholders, ensuring integrity, fairness and transparency. The Code of Ethics and the Code of Conduct communicate the Group's values and principles, while adhering to ethical and professional standards in the financial banking system. Fair competition is essential, and the Competition Compliance Policy sets out the principles to be respected by employees and collaborators. Violations or non-compliance with competition rules may result in sanctions. The Code also covers relationships with suppliers, avoidance

of conflicts of interest, human resources policy and employee conduct. All employees and directors must comply with these rules, and violations may result in disciplinary action.

To ensure the prompt and fair investigation of incidents of misconduct, including corruption and bribery, the Bank implements a clear and rigorous procedural framework aligned with applicable legislation, including the provisions of Directive (EU) 2019/1937. This framework includes the following key measures:

- **Secure and confidential reporting mechanisms** - The Bank provides secure channels for reporting incidents, protecting the identity of whistleblowers and preventing any form of retaliation.
- **Rapid initial assessment** - Complaints are analyzed immediately to determine the seriousness and necessary action, ensuring a prompt response.
- **Clear procedures and deadlines** - Investigations are carried out according to well-defined methodologies within a reasonable timeframe to ensure efficiency and fairness.
- **Collection and analysis of relevant evidence** - All available data and documents are analyzed, including statements, records and other evidence necessary for a fair assessment.
- **Transparency and information** - Stakeholders are notified of the progress of the investigation while respecting the necessary confidentiality.
- **Adoption of corrective and sanctioning measures** - Depending on the findings of the investigation, the bank applies appropriate measures.
- **Continuous monitoring and improvement** - Investigation procedures are regularly reviewed to identify and correct any deficiencies, thus ensuring an efficient and compliant process.

In addition to the mechanisms for the subsequent follow-up of whistleblower reports, the Group applies the Operational Risk Event Reporting Procedure, which defines internal fraud as the intentional violation of banking rules and regulations by an employee for the purpose of obtaining undeserved benefits, damaging the bank's physical or intellectual assets or reputation. The Internal Regulation on Fraud Risk Management at TDBFG level also explicitly addresses the types of fraud involving corrupt behavior.

### [Business Conduct Training Policy](#)

Subsidiaries' management participates annually in training and professional development programmes, tailored to the field of activity and the position held, with a focus on conflict of interest avoidance, fraud prevention and AML and KYC policies. Key functions, such as compliance, risk management, internal control and audit, are regulated by authorities such as ASF (Autoritatea de Supraveghere Financiara), BNR (Banca Nationala a Romaniei) or BNM (Banca Nationala a Moldovei), requiring the maintenance of a high level of training through regular programmes. Within Banca Transilvania, the BT Academy offers mandatory and optional courses on business ethics, managed by the HR Department, which monitors the functional structure and the professional development of employees. Also, in line with the selection and succession planning policy, the Bank implements annually a plan for the identification and training of



future leaders, ensuring the continuous preparation of 1-3 successors for each key role through career management, specific training and involvement in strategic projects.

As far as subsidiaries are concerned, their staff and management participate at least annually in training and professional development programs, according to their area of expertise and field of activity.

At the bank level, the programme of mandatory training in the area of conflicts of interest covered a comprehensive general topic area, including key issues such as conflicts of interest, gaming risks and anti-money laundering in the context of the new European legislative package. These training programs were designed to strengthen the culture of compliance, raise employee awareness, and ensure compliance with applicable regulations, thereby contributing to the prevention and effective management of operational and reputational risks.

#### Functions most at risk from corruption and bribery

Within BT Financial Group, the functions with the highest risk of corruption and bribery are those involved in financial decision making, credit approval, large customer relationship management and procurement. These include the area of credit review for individuals, where employees may be at risk of receiving bribes for approving ineligible loans, and the Procurement, Investment and Logistics Directorate, where there is a risk of favoring suppliers. Commercial banking for corporate customers, including the Large Corporate, SME and Agribusiness segments, is also at high risk as account managers may be influenced to grant preferential conditions. Compliance and Internal Audit departments, although having a preventive role, may be exposed to the risk of corruption to conceal misconduct, and top management functions, with decision-making power over financial strategies, may be influenced in favor of private interests.

The granting process, depending on the size of the customer, follows a well-defined flow implemented directly in the bank's IT systems. These automated mechanisms ensure control at every stage, reducing the risk of errors or abuse. Thus, the possibility of fraud by the person performing the analysis is considerably limited as checks and approvals are built into the system.

Thus, in the area of procurement, Banca Transilvania implements clear specifications for the approval of contracts through the Procedure for the Procurement of Works, Goods and Services. Prior to the approval of a procurement, the Procurement Officer or the internal beneficiary will submit a request for an opinion on potential conflicts of interest and reputational risk with regard to the winner of the procurement procedure and the short-listed finalists in the tender procedure as well as the supplier whose contract is being extended or to whom the contract has been directly awarded.

100% of the functions at risk have been covered by training on corruption-related issues.

	Functions exposed to risks	Directors	AMSB*	Other own workers
<b>Coverage of training courses</b>				
Total	20,000	200	16	70,000
Total number of people trained	19,500	150	8	5,000
<b>Course organization and duration</b>				
Classroom-based training	5 hours		61 hours	
Computer-based training	1 hour	2 hours	130 hours	
Voluntary computer-based training			-	1 hour
<b>Frequency</b>				
Frequency of training	Annual	Annual	Biannual	
<b>Topics covered</b>				
Definition of corruption	x	x	x	x
Policy	x	x	x	x
Procedures on suspicion/testing	x	x		
Etc.	x			

### RD G1-3 - Prevention and detection of corruption and bribery

#### Policies and procedures in place to prevent, detect and resolve allegations or incidents of corruption or bribery

The Group has a regulatory framework for the prevention, detection and resolution of incidents of corruption and bribery, based on the principle of zero tolerance of such acts. The main reference document is the **Code of Conduct and Ethics of the Group**, which sets out the general guidelines in this area in line with national and European regulations. It integrates prevention and protection mechanisms into the existing infrastructure, ensuring increased efficiency and accessibility for all employees.

**The internal rule on fraud risk management at the level of group** details the concepts of bribery, corruption and fraud and the most common situations in which they may occur, facilitating the identification and understanding of the associated risks. The **Investigation Procedure at the level of the Group** also sets out the procedural flows required to investigate incidents of corruption, ensuring a clear and well-defined process.

Another key document is the **Conflict-of-Interest Prevention and Management Policy**, which looks at the circumstances in which conflicts of interest may arise and how they should be managed.

**The procedure regarding the conduct of investigations at the level of the group** defines a uniform standard in the bank in terms of reporting/investigating/researching events/incidents of fraudulent

nature and outlines the tasks and responsibilities of each TDBFG structure/entity with attributions within these processes.

Investigators may be internal or external, depending on the needs of the case. Internal investigators are usually employees of BT's Analytical Department (AD) or of the department responsible for analyzing potential fraud, depending on the specifics of the situation. DA staff report functionally to the Anti-Fraud Director and administratively to the Deputy Director General, CRO, an autonomous key function reporting to the management body responsible for overseeing the veracity and accuracy of the results of enforcement activities over a period of time. At the conclusion of the investigation, the investigation report is forwarded to those responsible for making decisions, taking appropriate action or providing information, depending on the results of the investigation.

External investigators refer to third parties authorized by the bank, in accordance with applicable legislation, to conduct investigations and who assist the bank in this process. When external investigators are appointed, an internal representative from the anti-fraud department or responsible department will be designated as the contact person.

Regardless of their internal or external status, investigators must respect the fundamental rights of the individual, such as the right to privacy and the right to private life, and conduct investigations in accordance with the law, in a thorough and systematic manner. They must gather all relevant evidence and maintain independence throughout the investigative process.

#### Process for reporting results to administrative, management and supervisory bodies

The outcome of the investigations shall be recorded in an investigation report submitted to the Board. It is prepared by the investigator or team of investigators and submitted for approval, unless the investigation does not require extensive verification, and the findings may be e-mailed with or without recommendations. All details of the investigation, the persons involved, and the results are treated confidentially in accordance with BT/GFBT internal regulations on classification of information.

If a referral does not clearly indicate a suspicion of fraud, the anti-fraud division may carry out preliminary checks to frame the incident appropriately (suspicion of fraud, operational error, disciplinary misconduct, etc.) and depending on the outcome, may initiate an investigation, redirect the referral to other relevant directorates or close the case if the suspicions are not confirmed. Investigations are exclusively fact-finding and do not target BT/GFBT individuals or employees.

Regardless of how the investigation is initiated (complaint, referral or self-referral), if, prior to or during the course of the investigation, there are indications of direct or indirect involvement of a member of the Board of Directors (BoD), the Leaders's Committee (LC), a Senior Executive Director, Executive Director, Coordinating Director, Director or Deputy Director of BT/GFBT, it is mandatory to obtain approval for the continuation of the investigation from the relevant bodies or persons, through the Audit Division's (AD) management, as follows:

- BT's Board of Directors (BoD) - in cases where the person involved is a member of BT's Board of Directors (the decision to be taken without the presence or information of that member), the Board of Directors of any subsidiary of BTFG, BT's Leaders Committee (LC), or is a Senior Executive Director/Executive Director of BT;
- The CEO and Deputy General Manager ,CRO - in cases where the person involved is a Coordinating Director, Director or Deputy Director within BT/GFBT;
- Deputy General Manager ,CRO - with regard to other BT/GFBT employees, only if the investigation is initiated by self-referral.

These measures ensure the integrity of the investigation process, preventing conflicts of interest and maintaining the objectivity of investigations within the Group.

### Communication of policies to prevent and detect corruption to relevant persons

Responsibility for the adoption of the internal regulatory framework lies with the management of each entity within the Group. In order to facilitate this process and to optimize the use of the Group's resources, the Bank has implemented an IT structure (BT Intranet), which also gives a large part of the subsidiaries access to IT resources, including the repository of applicable regulations. In accordance with the Group Relations Policies and the Group Risk Management Framework, the Bank's internal rules applicable at the subsidiary level are published on the BT Intranet in the section "Common Subsidiary Rules" and communicated to the management of the subsidiaries by e-mail. For those subsidiaries that do not have access to the BT network, the Internal Regulatory Management Service of the Compliance Department, together with the IT Operations Department, the Information Security Department and the non-banking subsidiaries of the BT Financial Group, work together to determine the most effective methods of disseminating the relevant regulations. The issuing department of the Bank identifies the scope of the regulations and communicates it to the subsidiaries, which analyze the impact on their own methodological framework and make any adjustments that need to be approved internally, but no later than the second meeting of the subsidiary's Board of Directors following the communication. The Subsidiaries will confirm the approval to BT's Financial Subsidiaries Department, which will monitor implementation of the requirement. For similar activities not covered by Group-wide policies, the relevant department communicates the principles of uniform operation to the subsidiaries, and they adapt or issue their own policies in accordance with the Group Relations Policies and Risk Management Framework flow. Subsidiaries in the Financial Institutions category align their internal policies with the requirements of the BT Financial Group.

### Nature, scope and depth of anti-corruption or anti-bribery training programs offered

The anti-corruption and anti-bribery training programmes developed at the Group level take into account the main challenges that may arise in the day-to-day work of the bank:

- Fraud and corruption
- Fraud prevention

- Prevention of money laundering and terrorist financing
- Know your customer
- Preventing and managing conflicts of interest.

All these programmes have different themes, depending on the level of difficulty of the respective course programme (i.e. beginner, intermediate or advanced level) and include elements of the internal procedures in place to prevent illegal or unethical behavior.

In addition, where it is not possible to carry out such training and development programmes on the basis of internal expertise, third party training services are used to ensure the necessary package of knowledge and expertise within the TDBFG companies.

As employees of the Group, the management bodies benefit from continuous training and development, but the subject matter of these programmes is adapted to the scope of responsibilities within the company, the nature of its activities, as well as the expertise of the people performing these functions.

#### Action and resources to manage the material impacts, risks and opportunities related to corruption and bribery

Banca Transilvania implemented in 2024 a well-structured action plan to manage the material impact, risks and opportunities related to corruption and bribery. Among the main measures adopted are the continuous organization of mandatory trainings for employees, with a focus on risk areas, as well as the conduct of annual internal audits on procurement and contracting processes to identify possible irregularities.

Also in 2024, a rigorous system was implemented to review supplier relationships through due diligence and reputational screening using a **RiskRate** application, which helps the bank prevent exposure to fraud, corruption and other reputational risks. These measures are applied across the bank's entire group and value chain, directly impacting employees, suppliers and customers.

For the coming period, the bank has set a calendar for optimizing actions, which includes:

- Improve the anonymous application for reporting suspected corruption to ensure a more efficient and secure process;
- **Update the Code of Ethics and Conduct** to reflect the latest regulations and best practices;
- Calibration of the due diligence application for contracting partners, followed by supplier audit and database optimization;
- **Integration of subsidiaries into the system**, thus extending visibility and control over contractual partners;
- Introducing a mandatory course for employees on Anti-Bribery and Corruption (ABC).

In addition, as a remedial measure, the bank maintains active cooperation with the competent authorities in identified cases of corruption or bribery. The implementation of this plan is carried out

within the budgetary limits set by Banca Transilvania, ensuring the efficient use of resources to strengthen compliance and organizational integrity.

DR G1-4 - Incidents of corruption or giving or taking bribes

In 2024, at the level of GFBT, there were no:

- convictions for violation of anti-corruption and anti-bribery legislation.
- sanctions for violation of anti-corruption and anti-bribery legislation.

During FY2024, the Bank provided training to its own employees who are at risk with respect to these policies. For these at-risk functions, the training is mandatory, but the bank has also provided voluntary training for its own workforce.

In 2024, the total number of training hours on corruption-related issues was 17,747.

## ADDENDUM 1. SUBMISSION REQUIREMENTS FOR INFORMATION COVERED BY THE SUSTAINABILITY STATEMENT

The table below outlines the presentation requirements in ESRS 2 and the material thematic standards and indicates where information on each specific requirement can be found.

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## ADDENDUM 2. LIST OF INDICATORS DERIVING FROM OTHER EU LEGISLATION

The table below includes all ESRS indicators that derive from other EU legislation and indicates where the information can be found, if it has been determined to be material.

Presentation requirement and related indicator	SFDR Reference	Reference Pillar 3	Benchmarks Regulation	Reference to European Climate Law	Material/ Not material	No. pag.
<b>ESRS 2 GOV-1</b> Board gender diversity, paragraph 21 (d)	Indicator 13 in Table 1 of Annex 1		Commission Delegated Regulation EU 2020/1816, Annex II		DA	7
<b>ESRS 2 GOV-1</b> Percentage of board members who are independent, paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		DA	7
<b>ESRS 2 GOV-4</b> Statement on due diligence, paragraph 30	Indicator 10 in Table 3 of Annex 1				DA	18
<b>ESRS 2 SBM-1</b> Involvement in fossil fuel activities, paragraph 40 (d) i	Indicator 4 in Table 1 of Annex 1	Art. 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Table 1: qualitative information on environmental risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II		NU	N/A
<b>ESRS 2 SBM-1</b> Involvement in activities related to chemical production, paragraph 40 (d) ii	Indicator 9 in Table 2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		NU	N/A
<b>ESRS 2 SBM-1</b> Involvement in controversial weapons activities, paragraph 40 (d) iii	Indicator 14 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1818, Art. 12 (1) Delegated Regulation (EU) 2020/1816, Annex II		NU	N/A
<b>ESRS 2 SBM-1</b> Involvement in activities related to tobacco growing and production, paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Art. 12 (1) Delegated Regulation (EU) 2020/1816, Annex II		NU	N/A
<b>ESRS E1-1</b> Transition plan for achieving climate neutrality by 2050, paragraph 14				EU Regulation 2021/1119, Art. 2 (1)	DA	The Group does not yet have a climate transition plan, but its development is underway in line with its strategic direction.
<b>ESRS E1-1</b> Entities excluded from Paris aligned benchmarks, paragraph 16 (g)		Art. 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Model 1: Bank Portfolio - Climate Change Transition Risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Art. 12.1 from (d) to (g) and Art. 12.2		NU	N/A
<b>ESRS E1-4</b> Greenhouse gas (GHG) emission reduction targets, paragraph 34	Indicator 4 in Table 2 of Annex 1	Art. 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Model 3: Bank Portfolio - Climate change	Delegated Regulation (EU) 2020/1818, Art. 6		DA	The Group has not yet set GHG reduction targets.

		transition risk: alignment indicators		
<b>ESRS E1-5</b> Fossil fuel energy consumption by source (only for high climate impact sectors), paragraph 38	Indicator 5 in Table 1 and indicator 5 in Table 2 of Annex 1		NU	N/A
<b>ESRS E1-5</b> Energy consumption and energy mix, paragraph 37	Indicator 5 in Table 1 of Annex 1		NU	N/A
<b>ESRS E1-5</b> Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator 6 in Table 1 of Annex 1		DA	57
<b>ESRS E1-6</b> Gross GHG emissions for Scope 1, 2, 3 and total greenhouse gas emissions, paragraph 44	Indicators 1 and 2 in Table 1 of Annex 1	Art. 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Model 1: Bank Portfolio - Climate Change Transition Risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Art. 5 (1), 6 and 8 (1)	DA 61
<b>ESRS E1-6</b> Gross greenhouse gas emission intensity, paragraphs 53 to 55	Indicator 3 in Table 1 of Annex 1	Art. 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Model 3: Bank Portfolio - Climate Change Transition Risk: alignment indicators	Delegated Regulation (EU) 2020/1818, Art. 8 (1)	NU N/A
<b>ESRS E1-7</b> Greenhouse gas (GHG) removal and carbon credits, paragraph 56			Regulation (EU) 2021/1119, Art. 2 (1)	NU N/A
<b>ESRS E1-9</b> Exposure of the benchmark portfolio to physical climate change risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	NU N/A
<b>ESRS E1-9</b> Breakdown of monetary amounts by acute and chronic physical risk, paragraph 66(a)		Art. 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Model 5: Bank Portfolio - Climate Change Physical Risk: Exposures subject to physical risk		NU N/A
<b>ESRS E1-9</b> Location of significant assets exposed to material physical physical risk, paragraph 66 (c)				NU N/A
<b>ESRS E1-9</b> Breakdown of the carrying amount of the real estate assets by energy efficiency classes, paragraph 67(c)		Art. 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453, paragraph 34; Model 2: Bank Portfolio - Climate Change Transition Risk: Loans secured on real estate - Energy efficiency of collateral		NU N/A
<b>ESRS E1-9</b> Exposure of the portfolio to climate change opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II	NU N/A
<b>ESRS E2-4</b> Amount of each pollutant listed in Annex II of the European Pollutant Release and Transfer Register (E-PRTR) Regulation, Annex II, paragraph 28	Indicator 8 in Table 1 of Annex 1 Indicator 2 in Table 2 of Annex 1 Indicator 1 in Table 2 of Annex 1 Indicator 3 in Table 2 of Annex 1			NU N/A
<b>ESRS E3-1</b> Water and marine resources, paragraph 9	Indicator 7 of Table 2 of Annex 1			NU N/A

<b>ESRS E3-1</b> Dedicated policy, paragraph 13	Indicator 8 of Table 2 of Annex 1		NU	N/A
<b>ESRS E3-1</b> Sustainable oceans and seas, paragraph 14	Indicator 12 of Table 2 of Annex 1		NU	N/A
<b>ESRS E3-4</b> Total amount of water recycled and reused, paragraph 28 (c)	Indicator 6.2 of Table 2 of Annex 1		NU	N/A
<b>ESRS E3-4</b> Total water consumption in m <sup>3</sup> in relation to net revenue from own operations, paragraph 29	Indicator 6.1 of Table 2 of Annex 1		NU	N/A
<b>ESRS 2-SBM 3 - E4</b> Paragraph 16 (a) i	Indicator 7 of Table 1 of Annex 1		NU	N/A
<b>ESRS 2-SBM 3 - E4</b> Paragraph 16 (b)	Indicator 10 of Table 2 of Annex 1		NU	N/A
<b>ESRS 2-SBM 3 - E4</b> Paragraph 16 (c)	Indicator 14 of Table 2 of Annex 1		NU	N/A
<b>ESRS E4-2</b> Practices or policies for sustainable oceans/seas, paragraph 24 (c)	Indicator 11 of Table 2 of Annex 1		NU	N/A
<b>ESRS E4-2</b> Practices or policies for sustainable oceans/seas, paragraph 24 (c)	Indicator 12 of Table 2 of Annex 1		NU	N/A
<b>ESRS E4-2</b> Policies for combating deforestation, paragraph 24 (d)	Indicator 15 of Table 2 of Annex 1		NU	N/A
<b>ESRS E5-5</b> Non-recycled waste, paragraph 37 (d)	Indicator 13 of Table 2 of Annex 1		NU	N/A
<b>ESRS E5-5</b> Hazardous waste and radioactive waste, paragraph 39	Indicator 9 of Table 1 of Annex 1		NU	N/A
<b>ESRS 2-SBM3 - S1</b> Risk of incidents of forced labor, paragraph 14 (f)	Indicator 13 of Table 3 of Annex 1		NU	N/A
<b>ESRS 2-SBM3 - S1</b> Risk of incidents of child labor, paragraph 14 (g)	Indicator 12 of Table 3 of Annex 1		NU	N/A
<b>ESRS S1-1</b> Human Rights Policy Commitments, paragraph 20	Indicator 9 of Table 3 and Indicator 11 in Table 1 of Annex 1		DA	83
<b>ESRS S1-1</b> Due diligence policies on issues covered by the fundamental conventions of the International Labor Organization 1-8, paragraph 21		Delegated Regulation (EU) 2020/1816, Annex II	DA	84
<b>ESRS S1-1</b> Processes and measures to prevent trafficking in human beings, paragraph 22	Indicator 11 of Table 3 of Annex 1		NU	N/A
<b>ESRS S1-1</b> workplace accident prevention policy or management system, paragraph 23	Indicator 1 of Table 3 of Annex 1		DA	83
<b>ESRS S1-3</b> Complaints/ grievance mechanisms, paragraph 32 (c)	Indicator 5 of Table 3 of Annex 1		DA	80
<b>ESRS S1-14</b> Number of fatalities and number and rate of accidents at work, paragraph 88 (b) and (c)	Indicator 2 of Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	DA	91
<b>ESRS S1-14</b> Number of days lost due to injury, accident, death or illness, paragraph 88 (e)	Indicator 3 of Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	DA	91
<b>ESRS S1-16</b> Gender pay gap, unadjusted, paragraph 97 (a)	Indicator 12 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	DA	85
<b>ESRS S1-16</b> Excess CEO pay ratio, paragraph 97 (b)	Indicator 8 of Table 3 of Annex 1		DA	85
<b>ESRS S1-17</b> Incidents of discrimination, paragraph 103 (a)	Indicator 7 of Table 3 of Annex 1		DA	88

<b>ESRS S1-17</b> Non-compliance with the UN Principles on Business and Human Rights and the OECD Guidelines, paragraph 104 (a)	Indicator 10 of Table 1 and Indicator 14 in Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	DA	88
<b>ESRS 2-SBM3 - S2</b> Significant risk of child or forced labor in the value chain, paragraph 11 (b)	Indicators 12 and 13 in Table 3 of Annex 1		NU	N/A
<b>ESRS S2-1</b> Human Rights Policy Commitments, paragraph 17	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		NU	N/A
<b>ESRS S2-1</b> Policies related to value chain workers, paragraph 18	Indicators 11 and 4 in Table 3 of Annex 1		NU	N/A
<b>ESRS S2-1</b> Non-compliance with the UN Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Indicator 10 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	NU	N/A
<b>ESRS S2-1</b> Due diligence policies on matters covered by the fundamental conventions of the International Labor Organization 1-8, paragraph 19		Delegated Regulation (EU) 2020/1816, Annex II	NU	N/A
<b>ESRS S2-4</b> Human rights issues and incidents in the upstream and downstream value chain, paragraph 36	Indicator 14 of Table 3 of Annex 1		NU	N/A
<b>ESRS S3-1</b> Human Rights Policy Commitments, paragraph 16	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		NU	N/A
<b>ESRS S3-1</b> Non-compliance with the UN Principles on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	Indicator 10 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	NU	N/A
<b>ESRS S3-4</b> Human rights issues and incidents, paragraph 36	Indicator 14 of Table 3 of Annex 1		NU	N/A
<b>ESRS S4-1</b> Consumer and end-user policies, paragraph 16	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		DA	106
<b>ESRS S4-1</b> Non-Compliance with the UN Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	Indicator 10 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	DA	112
<b>ESRS S4-4</b> Human rights issues and incidents, paragraph 35	Indicator 14 of Table 3 of Annex 1		DA	112
<b>ESRS G1-1</b> United Nations Convention against Corruption, paragraph 10 (b)	Indicator 15 of Table 3 of Annex 1		DA	142
<b>ESRS G1-1</b> Protection of whistleblowers, paragraph 10 (d)	Indicator 6 of Table 3 of Annex 1		DA	142
<b>ESRS G1-4</b> Fines for violation of anti-corruption and anti-bribery legislation, paragraph 24 (a)	Indicator 17 of Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	DA	151
<b>ESRS G1-4</b> Standards on anti-corruption and anti-bribery legislation, paragraph 24 (b)	Indicator 16 of Table 3 of Annex 1		DA	151

### ADDENDUM 3. MANAGEMENT STRUCTURES AT THE LEVEL OF BT GROUP SUBSIDIARIES, AS AT DECEMBER 31, 2024

The subsidiaries of the Banca Transilvania Financial Group are managed in a unitary system, except for OTP AM, which is in a dualistic system, each having a Board of Directors appointed by the General Meeting of Shareholders or Associates, as the case may be. In the case of each subsidiary, the executive powers have been delegated to one or more executive managers, scaled in accordance with the breadth of each company's activity and the particularities that characterize each of them.

The supreme governing body of the company is the General Meeting of Shareholders or Associates which decides on the company's strategy according to the essential directions of development as recorded in respect of each entity within the perimeter of consolidation.

The management structures are responsible for overseeing the business conduct of each subsidiary, ensuring the integration of ethical standards, compliance frameworks and governance principles at all operational levels. Key responsibilities include establishing and updating ethical standards and policies, aligning them with the Group Code of Conduct, anti-corruption and fair competition policies, and overseeing compliance with industry regulations and practices in areas such as AML, anti-bribery and data privacy.

Each entity conducts its activities under the supervision of the ASF, the NBR or equivalent bodies in other countries, adapting the group's standards to the specific regulations of the sector. The governing bodies monitor the effectiveness of internal controls and whistleblowing mechanisms and manage misconduct. The governing bodies are also responsible for the integration of ESG elements into decision-making processes, extending the Sustainability Policy throughout the Group.

Business conduct is overseen through a double filter: The General Shareholders' Meeting sets the strategic direction, and the subsidiary's management, consisting of experts with various qualifications, which ensures strategic direction implementation. The Group proactively addresses challenges through the Management Body Member Suitability Assessment Policy and the Group level assessment.

Robust mechanisms for employee representation and social dialog have been established at the level of each subsidiary of the Group. Each company has a collective labor agreement, negotiated with elected employee representatives for a period of two years. Employee representatives elected every two years, play an important role in negotiating collective agreements, ensuring fair working conditions, fair wages and job security.

Starting with 2025, the Group's Sustainability Policy will be implemented at subsidiary level, adapted to the specific of each entity. The Boards of Directors of the subsidiaries monitor sustainability issues and oversee the activities of the companies. Advisory Committees, such as Audit, Risk Management and Remuneration, issue opinions on identified impacts, risks and opportunities.

In order to manage the complexity and novelty of these issues, the subsidiaries have developed training programs for staff and management and have contracted specialized experts to advise on sustainability issues. Specific measures impacting on sustainability are mentioned in the individual company sections.

#### Remuneration of staff and management of subsidiaries

The Group's primary objective regarding remuneration is to uphold the principle of fairness, taking into account business and risk strategies, corporate culture and values, long-term institutional interests and measures to mitigate conflicts of interest. The fundamental principles of the Remuneration Standard include generating long-term performance, attracting and retaining the best professionals, rewarding responsibility and track record, and generating sustainable and competitive returns.

The Group provides fair and competitive remuneration based on skills and performance, with two components: fixed and variable. Fixed remuneration reflects professional experience and organizational responsibility, and variable remuneration reflects sustainable and risk-adjusted performance, subject to annual review. Subsidiaries have their own remuneration policies tailored to the business, risk appetite and complexity of each company.

#### BT Microfinance IFN S.A. (BT Mic)

The leadership structure in BT Mic includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ the senior executive management, consisting of 4 executive members - one with coordinating powers over the entire activity, and 3 of them reporting directly to different areas of the company's activity, depending on their competences and the company's object of activity.

Non-executive management is necessarily subject to the approval of the NBR and has to go through the suitability procedure in order to be able to execute the mandate granted by the general meeting of shareholders.

#### Board of Directors

<b>Member name</b>	<b>Position</b>	<b>Member type</b>	<b>Nationality</b>	<b>Term of office</b>	<b>Relevance of experience to the company's sector, products and location</b>
Tiberiu Moisă	Chairman of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Luminița Runcan	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .

Daniel Szeleky	Member	non-executive	Romanian	4 years	Business executive with over 24 years of experience in the financial-banking sector. He previously held the position of Director IMM&Microbusiness consolidating his expertise in coordinating commercial activities for customers defined as SME and Micro Business, as well as monitoring aspects related to the interaction between them and the financial institution. He is a member of the Board of Directors of ROCA X, Ebriza Software SRL, BT Leasing, BT Mic, GapMinder VC and BT Club-Clubul Întreprinzătorului Român. He has also attended numerous training courses developing his skills.
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None of the members of the Administrative Board is independent.

#### Board structure by gender and age

Board of Directors of BT Leasing	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	1	33.3	2	66.7	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>33.3</b>	<b>2</b>	<b>66.7</b>	<b>3</b>	<b>100</b>

0.33 is the gender diversity rate at Board level.

#### Top Management

The management of the company with executive powers (**Directors**) are appointed by the Board of Directors and it is necessary that they fulfill the legal requirements, i.e. that they are approved by the NBR before the effective exercise of their functions. According to the relevant legal provisions, the Board of Directors has mandated the Directors of the non-banking financial institution jointly and severally (with some exceptions, individually) with the exercise of the duties of organization and management of its activity.

<b>Name</b>	<b>Position</b>	<b>Member type</b>	<b>Nationality</b>	<b>Term of office</b>	<b>Relevance of experience to the company's sector, products and location</b>
Cristina Şindile	General Manager	Executive	Romanian	4 years	Managing Director with over 22 years of experience in the financial-banking sector, specializing in strategic management, risk management and optimization of organizational processes. Holds a university degree which helps to strengthen his expertise in the financial sector.
Valentina Alexandru	Deputy General Manager	Executive	Romanian	4 years	Lending specialist with over 17 years of experience in the financial industry. Possesses skills in coordinating and developing lending strategies and implementing financial strategies for microenterprise.
Marian Ene	Deputy General Manager	Executive	Romanian	4 years	Deputy General Manager of the Business area with over 18 years of experience in the financial-banking sector. He has developed skills in the areas of business, marketing and PR, as well as in coordinating the activities of the SME department.
Dan Cojocaru	Deputy General Manager	Executive	Romanian	4 years	Risk Management Specialist with over 19 years of experience in the financial industry enhancing his expertise in identifying, reporting, assessing and mitigating financial risks, as well as implementing and developing risk management strategies. Academic training provides



a solid foundation of financial regulations.

#### Executive management structure by gender and age

Executive Board of BTmic	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	2	50	2	50	4	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>50</b>	<b>2</b>	<b>50</b>	<b>4</b>	<b>100</b>

0.5 is the rate of gender diversity in executive management.

Regarding business conduct, the rules of business conduct have been defined and implemented by the management and supervisory bodies in internal regulations to reflect the institution's values, integrity and compliance with applicable legal provisions.

BT Microfinance's ESG strategy is designed to integrate ESG principles into lending practices and corporate principles. Overall objectives include promoting financial inclusion, supporting entrepreneurship and strengthening governance structures. The policy addresses material impacts such as economic growth, social inclusion and environmental sustainability. The monitoring process involves continuous assessment and improvement of performance against these criteria. In order to implement the policy, the Institutional Development Department and the Business Development Support Department are responsible for designing and implementing lending products, developing digital tools and ensuring effective market servicing.

Regarding the impacts, risks and opportunities arising in the entity's day-to-day business, their monitoring and oversight has been delegated to the company's Directors. Depending on the operational area in which they arise, the reporting is made to the person with executive attributions who coordinates the respective operational line, and then the executive management reports quarterly to the Board of Directors of the company, the body empowered to implement and organize the necessary framework for the company's strategy, as approved by the general meeting. The lines of reporting to the persons in charge of coordination are set out in the Organization Chart and in the company's Rules of Organization and Functioning

At the same time, the AGM and the Board of Directors have a critical role in defining the principles and guidelines for conducting business in prudential conditions, thus ensuring an optimal internal control system taking into account the complexity and size of the company's business. Thus, in terms of the

professional training of the company's staff, both those who work under a mandate contract and those who work under an individual employment contract or similar, have continuous training, according to the needs identified by the Board in the course of its monitoring activity. Given the dynamic nature of the sustainability framework, one of the company's employees has been nominated to receive ESG training during the reporting period.

#### BT Leasing Transilvania IFN S.A. (BT Leasing)

Considering that the merger by absorption of the present company with OTP Leasing Romania IFN S.A. took place as at December 1, 2024, the data are presented exclusively from the perspective of the entity that took over the other company, BT Leasing being the one that absorbed OTP Leasing Romania IFN S.A. before the end of the reporting period.

The management structure in BT Leasing includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ the senior executive management, consisting of 3 executive members - one of them having coordinating powers over the entire activity, and 2 of them reporting directly to different areas of the company's activity, depending on their competences and the company's object of activity.

Non-executive management is necessarily subject to the approval of the NBR and has to go through the suitability procedure in order to be able to execute the mandate granted by the general meeting of shareholders.

#### Board of Directors

Member name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Tiberiu Moisă	Chairman of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Ioan Alin Nistor	Member of the Board of Directors	non-executive	Romanian	4 years	Professor of Finance at the Faculty of Business at the Babeş-Bolyai University of Cluj-Napoca and member of the board of BT Asset Management and BT Leasing. He holds a PhD in Finance and a post-doctoral program at Kobe University in Japan. Relevant experience as per CV, available <a href="#">here</a> .

Daniel Szeleky	Member	non-executive	Romanian	4 years	Business executive with over 24 years of experience in the financial-banking sector. He previously held the position of Director IMM&Microbusiness consolidating his expertise in coordinating commercial activities for customers defined as SME and Micro Business, as well as monitoring aspects related to the interaction between them and the financial institution. He is a member of the Board of Directors of ROCA X, Ebriza Software SRI, BT Leasing, BT Mic, GapMinder VC and BT Club-Clubul Întreprinzătorului Român. He also attended numerous training courses developing his skills.
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#### Board structure by gender and age

Board of Directors of BT Leasing	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	3	100	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>100</b>	<b>3</b>	<b>100</b>

0 is the gender diversity rate at Board level.

#### Top Management

The persons in the management of the company with executive powers (**Directors**) are appointed by the Board of Directors and it is necessary that they fulfill the legal requirements, i.e. that they are approved by the NBR before the effective exercise of their functions. According to the relevant legal provisions, the Board of Directors has mandated the Directors of the non-banking financial institution jointly and severally (with some exceptions, individually) with the exercise of the duties of organization and management of its activity.

<b>Name</b>	<b>Position</b>	<b>Member type</b>	<b>Nationality</b>	<b>Term of office</b>	<b>Relevance of experience to the company's sector, products and location</b>
Ionuț-Călin Morar	General Manager	Executive	Romanian	4 years	25 years of leasing experience in various positions (Director of Leasing, Deputy Managing Director, Managing Director) within BT Leasing.
Mihai Nicolescu	General Manager	Executive	Romanian	4 years	Deputy Chief Financial Officer with over 20 years in the financial sector. He represents one of the four heads of BT Leasing Transilvania. He has expertise in the coordination and management of financial accounting and reporting departments.
Liviu-Onuț Șerban	Deputy General Manager	Executive	Romanian	4 years	Commercial Deputy General Manager with over 16 years experience in lease financing. Possesses knowledge in coordinating and checking the work of organizational structures, developing strategies and policies for the company's development, analyzing economic indicators. Academic background provides a solid foundation of financial regulations.
Corina Portase	Deputy General Manager	Executive	Romanian	4 years	Deputy General Manager Risk and Compliance with more than 24 years of experience in the leasing finance business. She has knowledge in representing the company, ensuring and implementing its strategy, as well as its development policy, overseeing risk, as well as coordinating the activities of subordinate organizational structures.

Executive management structure by gender and age.

Executive management of BT Leasing	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	1	25	3	75	4	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>25</b>	<b>3</b>	<b>75</b>	<b>4</b>	<b>100</b>

0.25 is the gender diversity rate at executive management level.

Responsible for the oversight and control of sustainability impacts, risks and opportunities within BT Leasing are the Environmental Officer, a function carried out by the company's Chief Operating Officer, and the General Manager.

The company aims to maintain a highly trained workforce that is constantly undergoing professional development programs, and the Board of Directors monitors the company's expertise and skills in sustainability through the monthly reports it receives on these topics. With the same frequency the Board is informed on how significant these impacts, risks and opportunities are materialized, on the implementation of the measures required by a diligent approach to them, as well as on the results and effectiveness of the policies, actions, metrics and targets adopted to address them.

The mapping of the information provided by the sustainability statement in relation to the company's due diligence in the current business is based on the risk analysis carried out within the company's internal operational structure. Data is mapped internally on dedicated platforms by the Risk Department.

BT Pensii S.A.F.P.F. S.A. (BT Pensii)

The management structure in BT Pensii includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ the senior executive management, consisting of 4 executive members - one with coordinating powers over the entire activity, and 3 of them reporting directly to different areas of the company's activity, depending on their competences and the company's object of activity.

The entire management of the entity, executive or non-executive, must be authorized by the FAS, thus, regardless of the forum that appoints the members of the management team (the general meeting of shareholders or the board of directors), each of them must pass the suitability analysis made by the authority before they can execute their mandate.

## Board of Directors

<b>Member name</b>	<b>Position</b>	<b>Member type</b>	<b>Nationality</b>	<b>Term of office</b>	<b>Relevance of experience to the company's sector, products and location</b>
Aurel Bernat	Chairman of the Board of Directors	non-executive	Romanian	4 years	Executive Director of Financial Institutions and International Relations with over 20 years of experience in Banking. He has expertise in investment management, investor relations and international relations. He is also a member of the Management Board in BT Pensii, enhancing his skills. He is a graduate with a PhD in Management.
Anca-Eugenia Crăciun	Member of the Board of Directors	non-executive	Romanian	4 years	Private Banking Director with over 26 years of experience in the banking industry. She has expertise in creating and expanding the Private Banking network and its specific products, coordinating, maintaining and developing business relationships with existing and potential clients, as well as promoting and selling the Bank's products. She is a graduate and a member of the Board of Directors of BT Pensii SAFPF S.A..
Cosmin Antoine Constantin Călin	Member	non-executive	Romanian	4 years	Executive Director Large Corporate Clients with over 24 years of experience in the financial-banking industry. Expertise in developing client relationship portfolio

Large Corporates, coordinating, maintaining and developing business relationships with existing and potential clients, as well as coordinating and organizing numerous departments. Holds graduate degree and numerous courses.

### Board structure by gender and age

Board of Directors of BT Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	1	33.3	2	66.7	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>33.3</b>	<b>2</b>	<b>66.7</b>	<b>3</b>	<b>100</b>

0.33 is the gender diversity rate at Board level.

### Top Management

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Corina Mădălina Cojocaru	General Manager	executive	Romanian	4 years	Deputy Managing Director with more than 17 years of experience in capital markets and voluntary pension administration. She has knowledge in leading, controlling and coordinating the activities of the Operations Department, ensuring compliance with all legal provisions, as well as implementing the necessary controls for coordinated activities, project management and strategic management. She has a

					university degree and numerous courses and projects attesting to the skills acquired.
Dana Corina Benea	Deputy General Manager	executive	Romanian	4 years	Head of Risk Management Service with over 13 years in financial and operational risk management. Holds a dual academic background in mechanical engineering and economics combining analytical thinking on financial and risk management processes.
Ionuț Florentin Stroe	Deputy General Manager	executive	Romanian	4 years	Over 15 years experience in the Banking and Pension Fund Management sector. Possesses knowledge in coordinating marketing and sales departments as well as promoting and selling Banking products. He is also a college graduate which reinforces the acquired skills.

#### Executive management structure by gender and age

Executive management of BT Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	2	66.7	1	33.3	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>66.7</b>	<b>1</b>	<b>33.3</b>	<b>3</b>	<b>100</b>

0.67 is the gender diversity rate at executive management level.

Regarding sustainability impacts, risks and opportunities, the body responsible for overseeing them is the Board of Directors, but their effective management is at the executive level, through the Directors. The Directors, in relation to the company's critical operational areas, may propose to the Board the setting up of committees, if they deem it necessary, for the good management of specific issues of increased importance and with an impact on sustainability in the life of the company. The programs available to the employees have diverse themes, taking into account the key areas of the company's



business, its needs and the choice and potential of the employees as they emerge in the course of the ongoing work of coordinating the executive management.

The management structures of the company, namely the Board of Directors and the Directors, have supervisory and implementation tasks respectively.

The management structures ensure the existence of a favorable internal control framework of the company, ensuring that the conditions of prudential and legality of its activity are met. Thus, a first level of internal control is represented by the Internal Audit Department which, at BT Pensii level, establishes, implements and maintains an audit plan in line with the regulatory framework governing the company. The main areas subject to the internal auditor's assessment of effectiveness and adequacy are risk management, internal control, investment management and marketing activities, as well as the company's internal mechanisms and regulations. All these areas incorporate elements of sustainability impacts, risks and opportunities. The second level of control over the implementation of management's decisions taken to achieve sustainability objectives is internal control and risk management. These key functions exist within the company in order to fulfill legal prudential obligations, and thus sustainability issues fall within the remit of these internal corporate bodies.

BT Asset Management S.A.I. S.A. (BTAM)

The management structure in BT Asset Management includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ the senior executive management, consisting of 4 executive members - one with coordinating powers over the entire activity, and 3 of them reporting directly to different areas of the company's activity, depending on their competences and the company's object of activity.

The entire management of the entity, executive or non-executive, must be authorized by the FAS, thus, regardless of the body appointing the members of the management team (the general meeting of shareholders or the board of directors), each of them must pass the suitability analysis made by the authority before they can execute their mandate.

Due to the complexity of the company's regulatory and business framework, the Board of Directors is the body responsible for overseeing the sustainability impacts, risks and opportunities for BTAM.

## Board of Directors

Member name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Luminița Runcan	Chairman of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Aurel Bernat	Member of the Board of Directors	non-executive	Romanian	4 years	Executive Director of Financial Institutions and International Relations with over 20 years of experience in Banking. He has expertise in investment management, investor relations and international relations. He is also a member of the Board of Directors in BT Pensii, enhancing his skills. He is a graduate with a PhD in Management.
Oana Ilaș	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a>

None of the members of the Administrative Board is independent.

## Board structure by gender and age

Board of Directors of BTAM	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	2	66.7	1	33.3	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>66.7</b>	<b>1</b>	<b>33.3</b>	<b>3</b>	<b>100</b>

0.67 is the gender diversity rate at Board level.

## Top Management

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Dan Dascăl	General Manager	executive	Romanian	4 years	Managing Director with over 25 years of experience in Capital Markets. He joined Banca Transilvania Group in 2002. He is also a graduate of the Faculty of Automation and Computers in Cluj-Napoca.
Călin Condor	Deputy General Manager	executive	Romanian	4 years	Deputy General Manager with over 29 years of activity within the Banca Transilvania Group and in the financial sector. He also holds two post-graduate degrees in Business Administration and Banking and Capital Markets.

## Executive management structure by gender and age

Executive Board of BTAM	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	2	100	2	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>100</b>	<b>2</b>	<b>100</b>

0 is the rate of gender diversity in executive management.

The Board of Directors determines the company's development directions in accordance with the strategy adopted at company level by the General Meeting of Shareholders, the executive management being responsible for carrying out the measures ordered by the Board of Directors.

The main features of BTAM's governance system ensure the creation of an optimal framework for a correct, efficient and prudent management, based on the principle of business continuity, through the development and continuous updating of the internal regulatory framework, in accordance with the applicable legal regulations in force.

Within BTAM, the organizational structure is built in compliance with the relevant legal provisions in force, in such a way that its activity runs smoothly, in the best interest of the investors of the funds managed.

With regard to specific controls and procedures for managing impacts, risks and opportunities and how they are integrated with other internal functions, the lines of control in the case of the subsidiary are differentiated according to the origin of the controller, thus there is an internal line of control represented by the functional compartments that provide risk management and compliance functions, as required by the obligations imposed on fund managers. The second level of control of the entity is within the parent company, which has group-wide audit functions, and which verifies compliance with group audit, IT audit and HR audit standards, in line with the applicable standards and requirements of the BT Group.

The availability of the necessary skill set and expertise to oversee sustainability issues is valued within the subsidiary at all levels of the hierarchy, in accordance with the company's constitution and internal procedures. By ensuring compliance with legal provisions, the terms of the articles of incorporation and by adhering to best practices, robust, integral and competent management structures are implemented within BTAM. Thus, diversity of gender, age, nationality and ethnicity is encouraged within the management structures. The Subsidiary has policies in place on management structure suitability assessment, including integration. Regarding BTAM employees, the company provides continuous training and testing of their knowledge. The members of the management structures are committed to adhere to the internal principles in terms of human rights, equal opportunities and standards of ethics and conduct, and the regulations dealing with governance are the Rules of Organization and Operation of the investment management company BT Asset Management S.A.I. S.A. (RI.L.1.1-nn) and the Policy on the Application of Corporate Governance Principles by BT Asset Management SAI (P.L.1.11-nn) and all regulations referred to therein. The company also makes use of the expertise of specialized individuals who provide advisory services to the company on sustainability impacts, risks and opportunities.

The terms and conditions of the company's incentive schemes are laid down in the Remuneration Policy adopted at company level. It is endorsed by the Remuneration and Nomination Committee in place at BTAM and then approved by the Board of Directors.

With respect to business conduct, the General Shareholders' Meeting is the authority that provides strategic direction to BTAM with the task of setting strategic organizational objectives and allocating the resources necessary to achieve them. The management structure in BTAM includes the supervisory management body - the Board of Directors and the Executive Management. These principles include: moral integrity; impartiality, non-discrimination and avoidance of denigration; professionalism and transparency; compliance with applicable legislation; respect for confidentiality and professional secrecy; prevention and combating of corruption, money laundering and terrorist financing; prudent business conduct; social responsibility; protection of the reputation of BTAM and the BT Group; avoidance of conflict of interest.

## BT Capital Partners S.A. (BTCP)

The management structure in BT Capital Partners includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ the senior executive management, consisting of 4 executive members - one with coordinating powers over the entire activity, and 3 of them reporting directly to different areas of the company's activity, depending on their competences and the company's object of activity.

The entire management of the entity, executive or non-executive, must be authorized by the FAS, thus, regardless of the body appointing the members of the management team (the general meeting of shareholders or the board of directors), each of them must pass the suitability analysis made by the authority before they can execute their mandate.

### Board of Directors

Member name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Costel Lionăchescu	Chairman of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Ömer Tetik	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Leontin Toderici	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .

None of the members of the Administrative Board is independent.

### Board structure by gender and age

BTCP Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	3	100	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>100</b>	<b>3</b>	<b>100</b>

0 is the gender diversity rate at Board level.

## Top Management

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Daniela Rye	General Manager	executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Mihai Milchiş	Deputy General Manager	executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a>
Mirela-Lenuța Buduroiu	Deputy General Manager	executive	Romanian	4 years	Relevant experience as per CV, available here
Vlad Pintilie	Deputy General Manager	executive	Romanian	x	Relevant experience as per CV, available here

## Structure of executive management by gender and age

BTCP Executive Board	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	2	50	2	50	4	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>50</b>	<b>2</b>	<b>50</b>	<b>4</b>	<b>100</b>

0.5 is the rate of gender diversity in executive management.

Following the approval of the company's strategy at the general meeting, the Board of Directors proceeds to the implementation of the measures. The executive management implements BTCP's strategy, also executive members of the management inform and are accountable to the Board of Directors for the conduct of the company's business.

Oversight of sustainability impacts, risks and opportunities is provided by the Board of Directors.

Within the company there are a number of specialized committees set up to deal with various issues arising in the company's day-to-day business, including those related to sustainability issues, as well as to issue advisory opinions for use by the Board of Directors.

BTCP, through its administrative, management and supervisory bodies, is particularly concerned with developing the appropriate skills and expertise to mainstream sustainability issues. In this respect, BTCP works with the ESG Integration & IR Department at the parent company level to constantly update its internal framework of activity and control with new legislative requirements. The executive management of the company has also appointed a Sustainability Officer for the people within the company. This responsible person follows a continuous training and professional development program to meet the

demands of sustainability requirements and is in continuous dialogue with the above-mentioned parent company's management. The responsible person proposes the implementation of the various issues that are related to the company's significant impacts, risks and opportunities and proposes the updating of sustainability policies and procedures.

The company's compensation policies and practices do not create incentives that could cause relevant individuals to favor self-interest or the interests of the firm to the potential detriment of clients. The entity shall have gender-neutral remuneration policies and practices for categories of staff, including senior management, risk-takers, control functions, and any employee who receives an overall remuneration at least equal to the lowest remuneration received by senior management or risk-takers whose professional activities have a material impact on the risk profile of the firm or the assets under its management.

Internally, BTCP is developing sustainability policies and procedures, integrating sustainability risks and issues into the company's day-to-day business, which is also reflected in the disclosures published in the dedicated section of its website informing investors about the company's approach to achieving sustainability objectives. BTCP thus actively participates in the BT Group's sustainability and sustainability objectives.

Regarding the mapping of the information provided in its sustainability report to its internal due diligence process, as well as the integration of sustainability risks, BTCP aims to integrate sustainability risks into its investment decision-making process in order to familiarize clients with ESG concepts. To understand their importance, BTCP has dedicated sections on its website.

In order to be able to provide the information needed to make investment decisions and to be able to compare issuers in terms of environmental, social and governance risks, BTCP analyzes the quality of information available from issuers, their non-financial reporting, the evolution of ESG practices, transparency on how issuers address ESG issues and manage the related risks, basic pillars to enable us to develop our own viable methodology for analyzing issuers to assess, measure and monitor the environmental or social characteristics or impact of sustainable investments selected for investment, including data sources, selection criteria for financial instruments and relevant sustainability indicators used to measure environmental or social characteristics or overall sustainable impact. The Company takes all due diligence in analyzing the activity of issuers in the investment process, pursuing the objectives of investors, in the context that information on sustainability factors is currently incomplete for issuers listed on the BSE, there is a high probability:

- a. not being able to take into account the main negative impacts of all investment decisions on sustainability factors;
- b. not being able to avoid misleading customers with incorrect information about an issuer's sustainability characteristics - environmental misinformation - a company's positive environmental claims may not be true;

- c. not to consider the financial risks of sustainability issuers - sustainability financial instruments carry financial risks just like any other type of financial product; sustainability issuers do not necessarily offer better terms than non-sustainability issuers.

BTCP proposes to periodically reassess this situation and intends to gradually consider the adverse effects of investment decisions on sustainability factors as issuers make this information available.

The findings of the risk assessment in relation to the sustainability reporting process are considered when considering the implementation of new procedures or policies to integrate them.

Reporting on the above findings by the relevant departments is done in executive management meetings whenever the situation so requires (weekly/monthly).

BT Direct IFN S.A. (BT Direct)

The management structure in BT Direct includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ senior executive management, consisting of 4 executive members

Non-executive management is necessarily subject to the approval of the NBR and has to go through the suitability procedure in order to be able to execute the mandate granted by the general meeting of shareholders.

#### Board of Directors

<b>Member name</b>	<b>Position</b>	<b>Member type</b>	<b>Nationality</b>	<b>Term of office</b>	<b>Relevance of experience to the company's sector, products and location</b>
Gabriela Nistor	Chairman of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Florentina Virginia Mircea	Member of the Board of Directors	independent non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Oana Ilaş	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .



33% of Board members are independent.

#### Board structure by gender and age

BT Direct Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	2	66.7	0	0	2	66.7
>50 years	1	33.3	0	0	1	33.3
<b>Total</b>	<b>3</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>100</b>

1 is the gender diversity ratio at Board level.

#### Top Management

The company's executive management (Directors) are appointed by the Board of Directors and are required to fulfill the legal conditions, i.e. to be approved by the NBR before the effective exercise of their functions. According to the relevant legal provisions, the Board of Directors has mandated the Directors of the non-bank financial institution in jointly and severally (with some exceptions, individually) with the exercise of the duties of organization and management of its activity.

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Nicoleta Bott	General Manager	executive	Romanian	4 years	Relevant experience as per CV, available here.
Gabriel Gogu	Deputy General Manager	executive	Romanian	4 years	Relevant experience as per CV, available here.
Iuliana Puhalschi	Deputy General Manager	executive	Romanian	4 years	Economic Director with over 17 years experience in the financial-economic field. Expertise in managing fiscal activities and ensuring timely reporting to the competent authorities, maintaining contact with other financial institutions, coordinating internal and external audit counters and fiscal controls, economic strategy and process optimization. She holds a

graduate degree in economics, complemented with a Master's degree and Executive MBA. She is also a member of ACCA (Association of Chartered Certified Accountants) and CECCAR (Association of Chartered Accountants and Certified Accountants of Romania).

#### Executive management structure by gender and age

BT Direct Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	2	66.7	1	33.3	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>66.7</b>	<b>1</b>	<b>33.3</b>	<b>3</b>	<b>100</b>

0.67 is the rate of gender diversity in executive management

In addition, although the company's client portfolio is predominantly made up of individuals taking out personal loans, the sustainability impacts, risks and opportunities are low, and two new positions have been created in the company's organizational chart, an individual one - ESG Specialist - reporting to the Deputy Managing Director responsible for the risk function that monitors compliance with the sustainability commitments made and a collective body - Environmental Committee - consisting of 8 members, of which one non-voting member, responsible for the implementation of the ESG framework at the company.

The members of the Environmental Committee are part of both the management and the employees of the company with responsibility for risk monitoring, as well as the person designated as ESG specialist. These persons, whose duties fall within the scope of the NBR's ongoing supervision, constantly participate in continuous professional development and training programs, including sustainability training programs incorporating the full range of ESG topics. This body is also competent in business conduct, providing a second level of verification of compliance with the guidelines that guide the entity in its day-to-day business. It is also entitled to request any documents or information that it deems necessary to confirm compliance with internal rules with an impact on sustainability, from the perspective of its area of competence. The Board of Directors also has a Risk Management Committee, which issues opinions in an advisory capacity to the Board of Directors.

The Board of Directors shall have the power to decide on any action relating to the management of the Company, the management of its assets and, in general, the conduct of its business, without restriction (except for matters expressly falling within the competence of the General Meeting of Shareholders), as well as the power of control over the executive management. The Board of Directors determines the objectives and strategy of the Company's activity, following the strategic directions defined at the level of BT Group. The Board of Directors approves the Company's Organization and Management Regulations, the Significant Risk Management Strategy and their specific management procedures, as well as all policies, rules and procedures governing the Company's activity.

Subsidiary executive leaders work with the Board of Directors to ensure proper planning for the future of the Company and ensure effective communication as part of the leadership process.

The Risk Management Committee advises the Board of Directors on the risk appetite and overall current and future risk management strategy of the Company and oversees the implementation of that strategy. The Risk Management Committee shall ensure that the Board of Directors is kept informed of significant issues and developments that could influence the risk profile and performance of the Company, including the risk of money laundering and terrorist financing. The Risk Management Committee shall develop appropriate procedures to identify, assess, monitor and control significant risks. It shall submit for review at least quarterly reports on the functioning and activity of the Company, the monitoring of lending and credit risk management activities and on the evolution of significant risk indicators.

Furthermore, the role of the Board of Directors of BT Direct also includes taking decisions on the internal audit of the Company, which will be carried out in accordance with the legal provisions applicable to non-bank financial institutions and payment institutions, either (i) through the internal audit department of the Company or (ii) through the specialized internal audit department of the parent company. By relevant decisions, the Board of Directors (i) shall delegate all or part of its powers (except those that may not be delegated) to the Company's executive officers and (ii) may delegate, in specific cases, part of its specific powers to one or more persons, who may or may not be members of the Board of Directors, employees of the Company or third parties, by determining the limits of the powers subject to delegation.

The ESG and Risk Governance Specialist is appointed as the person in charge of sustainability issues, has established duties and responsibilities in this area and reports to the Deputy General Manager Risk within the Risk Management and Control Division.

The General Manager is functionally subordinated to the Administration and Operational Support, Commercial, Product Development, Prevention and Occupational Protection, IT Support, Administrative, and Project Coordination Divisions. Administratively, the General Manager reports to the Deputy Directors-General.

The Deputy General Manager Finance reports to the Finance and Reporting Division and the Deputy General Manager Risk reports to the Compliance, Credit Risk, Legal Support, Debt Collection and Risk Control and Management Divisions.

Regarding specific procedures for managing impacts, risks and opportunities and, if so, how they are integrated with other internal functions, the Group Corporate Governance Department (GCDG) within the parent company provides expert support to the company to ensure an effective corporate governance function aligned with applicable legal provisions and best practice standards on corporate governance for entities within BT Group.

Regarding the necessity, frequency and competence of reporting to the management and supervisory bodies, the company considers sustainability risks as insignificant risks and considers them as factors with minimal potential to accentuate the other types of risks of the company, given the specific nature of the activities carried out and the customer portfolio (only individuals domiciled in Romania, granting consumer loans with and without attached card (personal needs)). Also, the sensitivity analysis of climate and environmental risks did not reveal any significant exposure of the portfolio to physical risks. The Company has not established risk indicators that limit exposures or customer concentrations in areas with physical risks. The Company has analyzed its impact on risks and opportunities, the results of which are escalated through the sustainability report, annually to the Risk Management Committee and the Board of Directors. BT Direct maintains this approach to sustainability risks for the time being, given both the specifics of the business and the resources used by the Company in conducting its activities.

In terms of remuneration, the company has not implemented a remuneration system linked to sustainability issues for members of the Board of Directors and executive managers.

BT Direct contributes data to the consolidated non-financial reporting of the BT Group (in its capacity as a subsidiary of the BT Group) using the structure provided for this purpose.

The data required from the subsidiary to prepare the BT Group's consolidated sustainability reporting is collected from the company's day-to-day operations by the ESG specialist, who maintains the necessary audit documentation and is then transmitted/ made available to the parent company. BT Direct's internal sustainability reporting in relation to the company's own strategy is prepared by the ESG specialist, with data requested from internal structures and retaining audit evidence, then escalated to the Risk Management Committee and the Board of Directors. In terms of integrating the findings of its risk assessment and internal controls into the relevant internal functions and processes, BT Direct's internal sustainability reporting in relation to the company's own strategy is prepared by the ESG specialist, with data requested from internal structures and retaining audit evidence, and then escalated to the Risk Management Committee and the Board of Directors. The results of some internal analysis prepared for this purpose are included in the same sustainability report mentioned above.

Sustainability risks are considered as already existing risks and considered in internal risk management processes. The Company manages four categories of significant risks (credit, market, operational, reputational) and two categories of relevant risks (liquidity and compliance) in accordance with the Significant Risk Management Strategy and the Significant Risk Management Procedure.

As a concretization of the concerns related to climate change risks, the company has taken a first step by approving a sustainability strategy for the period 2022-2024 with proposed targets (KPIs), tracking their

evolution. The company has analyzed the effect of climate change risks through their risk drivers mapping the possible impact for BT Direct's risk categories as well as the effect on the sustainability of the business model.

The annual sustainability report presents the evolution of the KPIs monitored by the company, the company's initiatives to protect the environment, for employees, customers, future objectives, the climate sensitivity analysis of the customer portfolio based on "Climate Dashboard" published annually by the NBR. BT Direct's sustainable development strategy at the organizational level can be summarized as follows:

- BT Direct has established a dedicated sustainability function, namely the ESG and Risk Governance Specialist, with duties and responsibilities in this area, reporting to the Deputy General Manager Risk and within the Risk Control and Management Division;
- The Environment Committee has been set up with the main role of monitoring and managing ESG issues and operates based on a Regulation.

#### Board of Directors

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Bogdan Pleșuvescu	Chairman of the Board of Directors	non-executive	Romanian	4 years	<u>Relevant experience as per CV, available <a href="#">here</a>.</u>
Luminița-Delia Runcan	Member of the Board of Directors	non-executive	Romanian	4 years	<u>Relevant experience as per CV, available <a href="#">here</a></u>
George Călinescu	Member of the Board of Directors	non-executive	Romanian	4 years	<u>Relevant experience as per CV, available <a href="#">here</a></u>

None of the members of the Administrative Board is independent.

### Board structure by gender and age

Board of Directors of ICC	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	1	33.3
<b>Total</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>100</b>

0.33 is the gender diversity rate at Board level.

### Top

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Paul Țupa	General Manager	executive	Romanian	4 years	27 years experience in the financial-banking sector.
Stefan-Dan Dragomir	Deputy General Manager	executive	Romanian	4 years	24 years experience in the financial-banking sector.

### Structure of executive management by gender and age

Executive Board of ICC	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	2	100	2	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>100</b>	<b>2</b>	<b>100</b>

0 is the rate of gender diversity in executive management.

Sustainability impacts, risks and opportunities are overseen by the Board of Directors, which receives recurring monthly reports from the executive management that coordinates the day-to-day business of the company. From among the company's employees, reports on current activities are made through the person in charge of the Reporting, Quality Control and Special Projects Service to the executive management.

The main risks encountered in the company's day-to-day business are reputational risk, compliance risk - particularly in view of the company's core business, debt recovery risk, liquidity risk and credit risk. Their assessment takes place at each hierarchical level of the company, as described above.

With regard to how sustainability impacts, risks and opportunities are reflected in the company's remuneration policy, in accordance with the Remuneration Policy in force at ICC, the general principles applicable to the allocation of variable remuneration are to generate long-term performance, attract and retain the best professionals, reward the level of responsibility and track record, ensure the company's profit, ensure transparency in remuneration policy and respect the interests of clients. These aspects impact sustainability factors at the company level, creating the right framework for the fulfillment of the company's business purpose and ensuring its continuous operation.

In terms of business conduct, the provisions of the Code of Ethics and Conduct applicable at the BT Group level are applicable within the ICC. The Know Your Customer Policy, the Prevention of Money Laundering and Terrorist Financing Policy and the Fraud Risk Management Rule also apply. ICC employees participate in regular trainings organized by the BT Academy.

#### BT Leasing Moldova S.R.L. (BT Leasing MD)

The management structure in BT Leasing Moldova includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ the senior executive management, consisting of 4 executive members - one with coordinating powers over the entire activity, and 3 of them reporting directly to different areas of the company's activity, depending on their competences and the company's object of activity.

#### Board of Directors

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Bogdan Pleşuvescu	Chairman of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available <a href="#">here</a> .
Ionuț-Călin Morar	Member of the Board of Directors	non-executive	Romanian	4 years	25 years of experience in leasing in various positions (Leasing Director, Deputy General Manager, General Manager) within BT Leasing.
Roman Țurcan	Member of the Board of Directors	non-executive	Romanian	4 years	Experience in the banking and advisory as well as in the entrepreneurial sector. Possess skills in analyzing financial performance and prudential requirements,

risk management,  
leadership.

None of the members of the Administrative Board is independent.

#### Board structure by gender and age

Board of Directors of BT Leasing MD	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	3	100	3	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>100</b>

0.33 is the gender diversity rate at Board level.

#### Top Management

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Marius-Călin Crăciunaș	General Manager	executive	Romanian	4 years	27 years experience in the financial-banking sector.

Given that the executive tasks are delegated to one person, the diversity indicators could not be determined.

The supreme governing body of the company is the General Meeting of Shareholders, which administers the company through the Board of the Company, which is composed of 3 members (administrators), elected by the General Meeting of the Associates.

The General Meeting of the Shareholders also elects the Chairman of the Board of the Company from the 3 members.

BT Leasing MD: Description of the Management and Control Bodies in chapter 3 of the BT Leasing MD 's Rules of Organization and Functioning and in the recently updated edition of the BT Leasing MD 's Risk Management Procedure (chapter 2)

BT Broker de Asigurări S.R.L. (BT broker)



The management structure in BT Insurance Broker SRL includes:

→ the supervisory management body - the Board of Directors, consisting of 3 non-executive members, and

→ senior executive management, represented by a single executive member - having coordinating powers over the entire company, with the entire administrative apparatus of the company directly subordinated to it

The entire management of the entity, executive or non-executive, must be authorized by the FAS, thus, regardless of the forum that appoints the members of the management team (the general meeting of shareholders or the board of directors), each of them must pass the suitability analysis made by the authority before they can execute their mandate.

#### Board of Directors

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Bogdan Pleşuvescu	Chairman of the Board of Directors	non-executive	Romanian	4 years	<a href="#">Relevant experience as per CV, available here.</a>
Luminița-Delia Runcan	Member of the Board of Directors	non-executive	Romanian	4 years	<a href="#">Relevant experience as per CV, available here</a>
Ionuț-Călin Morar	Member of the Board of Directors	non-executive	Romanian	4 years	25 years of experience in leasing in various positions (Leasing Director, Deputy General Manager, General Manager) within BT Leasing.

None of the members of the Administrative Board is independent.

Executive Management of BT Insurance Broker	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	1	33.3
<b>Total</b>	<b>1</b>	<b>33.3</b>	<b>2</b>	<b>66.7</b>	<b>3</b>	<b>100</b>

## Top Management

<b>Name</b>	<b>Position</b>	<b>Member type</b>	<b>Nationality</b>	<b>Term of office</b>	<b>Relevance of experience to the company's sector, products and location</b>
Laura Cheșa	General Manager	executive	Romanian	4 years	Over 25 years experience in the insurance sector. Skilled in negotiating employment contracts, developing insurance portfolio, as well as cooperating with insurance companies, preparing reports for auditors and shareholders.

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As this is a one-man company, the diversity indicators could not be determined.

## Salt Bank

### Members of the Board of Directors

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Ivo Alexandrov Georgiev	President of the Board	Independent Non-executive	Bulgarian, British	4 years	Experience <u>relevant</u> to Salt Bank's sector, products and location
Costel Lionachescu	Member of the Board	Independent Non-executive	Romanian	4 years	Experience <u>relevant</u> to Salt Bank's sector, products and location
Omer Tetik	Member of the Board	Non-executive	Romanian,	4 years	Experience <u>relevant</u> to Salt Bank's sector, products and location
Tiberiu Moisa	Member of the Board	Non-executive	Romania	4 years	Experience <u>relevant</u> to Salt Bank's sector, products and location
Gabriela Nistor	Member of the Board	Executive	Romanian	4 years	Experience <u>relevant</u> to Salt Bank's sector, products and location

40% of the members of the Administrative Board are independent.

0.2 is the gender diversity rate at Board level.

### Board structure by gender and age

Board of Directors of Salt Bank	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	0	0	0	0
>50 years	1	20	4	80	5	100
<b>Total</b>	<b>1</b>	<b>20</b>	<b>4</b>	<b>80</b>	<b>4</b>	<b>100</b>

**The Steering Committee (SC)** is the Bank's executive body that organizes, directs and is responsible for the day-to-day business, manages the business efficiently and prudently in a manner consistent with the strategy and management framework approved by the BoD and is subordinate to it.

## Members of the Steering Committee

Name	Position	Member type	Nationality	Duration	Relevance of experience to the company's sector, products and location
Gabriela Nistor	General Manager	Executiv	Romania	3	Experience <u>relevant</u> to Salt Bank's sector, products and location
Sorin Dumitrescu	Deputy General Manager	Executiv	Romania	4	Experience <u>relevant</u> to Salt Bank's sector, products and location
Sinan Kircali	Deputy General Manager	Executiv	Romanian,	4	Experience <u>relevant</u> to Salt Bank's sector, products and location
Robert Anghel	Deputy General Manager	Executiv	Romania	4	Experience <u>relevant</u> to Salt Bank's sector, products and location

## Structure of the Steering Committee by gender and age

Steering Committee of Salt Bank	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
30-50 years	0	0	1	25%	1	25
>50 years	1	25	2	50%	3	75
<b>Total</b>	<b>1</b>	<b>25%</b>	<b>3</b>	<b>75%</b>	<b>4</b>	<b>100%</b>

0.25 is the gender diversity rate at Board level.

## Management structures at Victoriabank

Within Victoriabank, the General Meeting of Shareholders (AGM) is the supreme authority of the Bank. Decisions taken by the AGM on matters within its competence are legally binding on both the Bank's governing bodies and shareholders. The powers of the AGM include

- Approval of the Bank's Statute, including possible amendments/completions;
- Approval of the AGM Regulation;
- Approval of the BoD Regulation, election of BoD members, setting annual remuneration and compensation;

The Bank's governing bodies are the Board of Directors (BoD) and the Management Committee (MC)

**The Board of Directors (BoD)** is the management body that fulfills the role of overseeing the management decision-making process and monitoring the implementation by the executive body of the strategic objectives defined in the governance and corporate culture framework, being responsible for the Bank's overall business, performance and financial soundness

#### Members of the Board of Directors

<b>Name</b>	<b>Position</b>	<b>Member type</b>	<b>Nationality</b>	<b>Duration</b>	<b>Relevance of experience to the company's sector, products and location</b>
Thoams Grasse	Chairman of the Board of Directors	Non-executive, independent	German	4 years	Thomas Grasse has extensive international experience, serving as an independent director and chairman of private and government sector boards. His work is concentrated in Banking and Financial Institutions, with expertise in growth, restructuring and strategic M&A. With over 35 years of experience, he has coordinated strategic partnerships, corporate governance initiatives and compliance projects in financial institutions in Europe and CIS/CESEE regions.
Mehmet Murat Sabaz	Member of the Board of Directors	Non-executive, independent	Turkish	4 years	Murat Sabaz has solid experience in developing start-up businesses, managing turnaround processes and operating in dynamic environments. He has expertise in customer relationship management, debt restructuring and business process optimization. He also has advanced knowledge in macroeconomic modeling and risk management. His experience covers retail,

corporate, SME and agricultural banking segments.

Tiberiu Moisă	Member of the Board of Directors	Non-executive, independent	Romanian	4 years	Tiberiu Moisă has more than two decades of experience in the development and consolidation of Banca Transilvania, having played a key role in managing corporate clients in various segments. His contribution goes beyond Banking, being involved in initiatives with significant impact on local communities. Projects such as BT Mic, Transilvania Executive Education and BT Club reflect its commitment to supporting entrepreneurship and social responsibility. Since 2018, upon joining Victoriabank, Tiberiu Moisă has supported the enhancement of the corporate strategy and the strengthening of the Bank's financial position.
Peter Franklin	Member of the Administrative Board	Non-executive, independent	British	4 years	Peter Franklin has over 40 years of experience in the financial services industry, with a strong expertise in corporate and retail banking. Throughout his career, he has held key positions in corporate treasury, finance and client relationship management at leading institutions such as HSBC, Chase Manhattan, ANZ and General Electric. He has also served on supervisory boards and management committees, contributing to the strategic development of the organizations in which he has been involved.
Ludmila Costin	Member of the Board of Directors	Non-executive, independent	Moldovan	4 years	Ludmila Costin is a professional with more than 24 years of experience in the insurance and consulting industry, with a solid expertise in the business

environment in Moldova and Romania. Her career includes senior roles in companies such as PwC and Grant Thornton, as well as working as an independent advisor. She specializes in financial crime compliance, internal control and risk management.

80% of Board members are independent.

20% is the gender diversity rate at Board level.

#### Board structure by gender and age

Board of Directors of Victoriabank	Women		Men		Total	
	No.	%	No.	%	No.	%
<30	0	0	0	0	0	0
30-50	1	20	1	20	1	40
>50	0	0	3	60	3	60
<b>Total</b>	<b>1</b>	<b>20</b>	<b>4</b>	<b>80</b>	<b>5</b>	<b>100</b>

**The Steering Committee (SC)** is the Bank's executive body that organizes, directs and is responsible for the day-to-day business, manages the business efficiently and prudently in a manner consistent with the strategy and management framework approved by the BoD and is subordinate to it.

#### Members of the Steering Committee

Name	Position	Member type	Nationality	Duration	Relevance of experience to the company's sector, products and location
Levon Khanikyan	President	Executive	Armenian	4 years	Levon Khanikyan has over 20 years of experience in financial and risk management. He specializes in building and leading diverse teams and has a strong academic background, including an MBA in

					International Management and CFA certification. His work in Romania and Eastern Europe provides a practical perspective on retail and SME banking, treasury and capital markets.
Sorin Şerban	Vice-President	Executive	Romanian	4 years	Sorin Şerban has over 29 years of experience in the banking sector, specializing in risk management, underwriting and restructuring. As CRO, he is familiar with the legal requirements and regulatory framework applicable to commercial banks. Throughout his career, he has coordinated the implementation of the Bank's risk strategy and assessed the effectiveness of the governance framework.
Elena-Ionela Maloş	Vice-President	Executive	Romanian	4 years	Elena Ionela Maloş has experience in planning and coordinating banking operations, with expertise in cash management, foreign exchange payments and credit processing, ensuring compliance with internal regulations and financial legislation. She is actively involved in the digitalization of the Bank, contributing to projects such as Digital Onboarding, MIA service and mobile app update.
Vitalie Corniciuc	Vice-President	Executive	Moldovan	4 years	Vitalie Corniciuc has expertise in auditing, IFRS 9 and international auditing standards. Within the Bank, he coordinates accounting, financial reporting, budgeting and financial analysis. His achievements include the development and implementation of a project to restructure the financial-accounting departments at CB Victoriabank SA, aligning these functions with the Banca Transilvania model.
Mircea Aursulesei	Vice-President	Executive	Romanian	4 years	Since the beginning of his activity in the bank, Mircea Aursulesei has managed the



network of subdivisions, which includes 24 branches and 38 agencies. He has experience in developing banking products for Retail and SME customers, contributing to the improvement of operations in these business segments.

#### Structure of the Management Board by gender and age

Board of Directors of	Women		Men		Total	
	No.	%	No.	%	No.	%
<30	0	0	0	0	0	0
30-50	1	20	3	60	4	80
>50	0	0	1	20	1	20
<b>Total</b>	<b>1</b>	<b>20</b>	<b>4</b>	<b>80</b>	<b>5</b>	<b>100</b>

0.2% is the gender diversity rate at Board level.

#### Structure of the management bodies within OTP Bank Romania S.A.

##### Members of the Supervisory Board

Name	Position	Membership type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Ömer Tetik	Chairman of the Supervisory Board	Non-executive	Romanian	1 year	Ömer Tetik has been Chairman of the Supervisory Board since 2024 and CEO of Banca Transilvania since 2013. Under his leadership, BT has become the largest bank in Romania and South-Eastern Europe. He is a strong supporter of the development of the Romanian capital market. He has over 20 years of banking experience in Romania, Russia and Turkey. He started his career at ATA Securities in Turkey (Izmir) and a year later moved to Istanbul to join the treasury team of

Finansbank. In 1997 he moved to Russia for the position of Coordinator of the Treasury and Capital Market Department of Finansbank Moscow. He made the move to Romania in 2000, when the same bank gave him a new assignment, namely the position of Deputy Vice President. Ten years later he became Vice President and then President of Credit Europe Bank, formerly Finansbank. He was born in Hamburg, Germany, into a Turkish diaspora family. He studied in Turkey and graduated in economics at the Middle East Technical University.

Bogdan Pleşuvescu	Member of the Supervisory Board	Non-executive	Romanian	1 year	<p>Bogdan Pleşuvescu is a professional with over 20 years of experience in the banking sector in Romania and the Republic of Moldova. He currently holds the position of Deputy General Legal Director at Banca Transilvania, where he coordinates the subsidiaries of Banca Transilvania Financial Group and the activities of the legal, workout, insolvency, foreclosures, asset recovery and amicable collection departments. Previously, Mr. Pleşuvescu was General Manager of Victoriabank in the Republic of Moldova, where Banca Transilvania is a shareholder. He also worked at Credit Europe Bank Romania, ABN AMRO/RBS Bank Romania and Finansbank. His career started at the Authority for Privatization and Administration of State Holdings. Mr. Pleşuvescu is a graduate of the A.I. Cuza Law Faculty in Bucharest and attended post-graduate courses in International Law at the University of Bucharest.</p>
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Costel Lionăchescu	Member of the Supervisory Board	Non- executive, independent	Romanian	1 year	Costel Lionăchescu is a professional with extensive experience in the Romanian financial-banking sector. He is currently a member of the Board of Directors of Banca Transilvania. During his career, he has held various management positions, including at Capital Partners, Bancpost, Citibank Romania and ING Bank Romania. Lionăchescu has a solid education in economics and finance, having graduated from the Executive Master of Business Administration (EMBA) program at ASEBUSS in collaboration with Washington University in Seattle. He has also been involved in various educational and training activities both at home and abroad.
Leontin Toderici	Member of the Supervisory Board	Non-executive	Romanian	1 year	Leontin Toderici is a professional with extensive experience in the Romanian banking industry. He is currently Deputy Chief Operating Officer at Banca Transilvania, where he has been coordinating the Bank's operations since 200512. He has also been involved in important strategic projects, including the replacement of the core-banking system with the Oracle Flexcube solution and the launch of the Western Union ATM money transfer service. Mr. Toderici has a strong educational background, holding a PhD in cybernetics and economic statistics from Babeş-Bolyai University and an Executive MBA from the Academy of Economic Studies in Bucharest in collaboration with the Conservatoire National des Arts et Métiers in France.
Mirela Ileana Bordea	Member of the	Non- executive, independent	Romanian	1 year	Mirela Bordea is a professional with over 30 years of experience in the Romanian

Supervisory  
Board

banking sector. She is currently an independent non-executive member of the Board of Directors of Banca Transilvania. She is also a member of the Bank's Audit Committee. Previously, Mirela Bordea worked at Credit Europe Bank (formerly known as Finansbank), where she managed the risk and lending activity and served as Vice President and member of the Board of Directors. She was also a member of the Board of Directors of the Romanian Association of Banks, contributing to the development of the financial-banking environment in Romania.

40% of the members of the Supervisory Board are independent.

0.2 is the gender diversity rate at the Supervisory Board level.

#### Structure of the Supervisory Board by gender and age

Supervisory Board of OTP Bank Romania SA	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	1	20	1	20
>50 years	1	20	3	60	4	80
<b>Total</b>	<b>1</b>	<b>20</b>	<b>4</b>	<b>80</b>	<b>5</b>	<b>100</b>

\*Percentages mentioned above have been obtained on the basis of 5 SB members, 2 positions being vacant at the time of reporting

**Management Board** Management Board ensures the management function within the Bank, by carrying out the necessary and useful acts for the realization of the Bank's object of activity, except those reserved by law to the Supervisory Board and the General Meeting of Shareholders.

Members of the Management Board

Name	Position	Member type	Nationality	Duration	Relevance of experience to the company's sector, products and location
Luminița-Delia Runcan	President of the Management Board	Executive	Romanian	1 year	<p>In her vast experience in Banking, Ms. Luminița Runcan has been the CEO and Chairman of the Management Board of OTP Bank since 2024. She has held a number of management positions at Banca Transilvania, including Deputy General Manager Treasury and Deputy General Manager Risk Management. At the same time, Luminița Runcan is a member of the Board of Directors of several BT Group companies, as well as the President of the Romanian Financial Markets Association, Vice President of the Romanian Banking Association and Treasurer at AmCham Romania. He is one of the first 13 employees of Banca Transilvania, having made a significant contribution since the very beginning of BT's activity.</p>
Luca-Victor Rogojanu	Member	Executive	Romanian	4 years	<p>Luca Rogojanu has more than 20 years of experience in the banking industry, with a strong orientation and specialization in risk and risk management. He started his career as a banking supervisory inspector at the NBR, after which he worked in several roles as risk manager or division coordinator. In terms of academic background, he holds a PhD in economics, an MBA from the Central European University and a double degree in economics and law. He has also completed training and further training at the Federal Reserve Bank (New York), Deutsche Bundesbank or the National Bank of Poland.</p>

Constantin Mareş	Member	Executive	Romanian	4 years	Constantin Mareş has more than 25 years of experience in Banking and has held top and senior management positions for the last 20 years. Since 2015, he has been the promoter of the cultural change within OTP Bank Romania, a change that encompassed both digital transformation and the transformation of the way of working into an agile, collaborative and modern one. He was directly responsible for the success of the program that focused on improving customer experience, process efficiency and the development of key products in the portfolio. He started his career at Bancorex in the Capital Markets department. She then moved to ING, where she worked for 9 years, headed the IT department and participated in the launch of technology-only retail services. In 2006 he joined the team that prepared the launch of Millennium Bank in Romania. Six years after joining Millennium Bank, he was promoted to the Bank's top management, first coordinating the operational area and then as head of the corporate clients area.
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#### Structure of the Management Board by gender and age

Management Board of OTP Bank Romania SA	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	1	33.3	1	33.3
>50 years	1	33.3	1	33.3	2	66,7
<b>Total</b>	<b>1</b>	<b>33.3</b>	<b>2</b>	<b>66.7</b>	<b>3</b>	<b>100</b>

\*The above-mentioned percentage figures have been obtained on the basis of 3 members of the Executive Board, 2 positions being vacant at the time of reporting

BCR Chisinau S.A.

<b>Name</b>	<b>Position</b>	<b>Membership type</b>	<b>Nationality</b>	<b>Term of office</b>	<b>Relevance of experience to the company's sector, products and location</b>
Bogdan Plesuvescu	President of the Supervisory Board	Non-executive	Roman	1	<p>Bogdan Pleșuvescu has over 20 years of experience in five banks in Romania and the Republic of Moldova. He coordinates the subsidiaries of Banca Transilvania Financial Group, as well as the work of the legal, workout, insolvency, foreclosures, asset recovery and amicable collection departments. From 2018 to 2023 he was General Manager of Victoriabank (Republic of Moldova), in which BT is a shareholder. In 2013 - 2018 he was also part of the BT Team as Executive Director Legal, Workout and Insolvency. He also worked at Credit Europe Bank Romania, ABN Amro/RBS Bank Romania and Finansbank, and started his career at the Authority for Privatization and Administration of State Assets. He was the President of the Legal Commission of the Romanian Association of Banks until 2018 and is the founder of the Association of Legal Advisors in the Financial-Banking System.</p> <p>He graduated from the Faculty of Law A.I.Cuza, Bucharest. He specialized in International Law, following postgraduate courses in International Law at the Faculty of Law, University of Bucharest.</p> <p>He was born in 1976, in Bucharest.</p>
Luminita-Delia Runcan	Member	Non-executive	Roman	1	<p>In her vast experience in Banking, Ms. Luminița Runcan</p>

has been the CEO and Chairman of the Management Board of OTP Bank since 2024. She has held a number of management positions at Banca Transilvania, including Deputy General Manager Treasury and Deputy General Manager Risk Management. At the same time, Luminița Runcan is a member of the Board of Directors of several BT Group companies, as well as the President of the Romanian Financial Markets Association, Vice President of the Romanian Banking Association and Treasurer at AmCham Romania. He is one of the first 13 employees of Banca Transilvania, having made a significant contribution since the very beginning of BT's activity.

Mehmet Murat Sabaz	Member	Non-executive, independent	Turkish	1	<p>Mr. <u>Mehmet Murat Sabaz</u> is a graduate in economics/business administration - Bachelor in Management and therefore has knowledge appropriate to the nature, scope and complexity of the Bank's business and the responsibilities entrusted to him</p> <p>Consistent - in the course of his work and previous experience Mr. Sabaz Mehmet Murat is consistent in the opinions and decisions he makes, basing his decisions on his own convictions and not being influenced by emotional and/or subjective factors from outside. At the same time, he shows flexibility and takes into account the opinions of colleagues in the decision-making process.</p> <p>Credibility - Mr. Sabaz Mehmet Murat has demonstrated credibility throughout his</p>
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professional career. He is adept at open communication, especially during meetings of the governing body and specialized committees, and this skill is highly appreciated. Language - formulates thoughts clearly and articulately, using professional and intelligible language, at the same time, Mr. Sabaz Mehmet Murat at fluent level of Romanian and English, which allows him to communicate effectively with other Bank staff, and at intermediate level he knows Croatian and Italian. The candidate appreciates his/her ability to communicate in a multilingual context at a high level.

Professional Maturity - Mr. Sabaz Mehmet Murat displays cultural tolerance, bases his reasoning on confirmed facts, and is not guided by emotions. During these years, he has had numerous situations that required deep analysis, but also prompt and balanced decisions, thus he has gained relevant experience and skills necessary for a managerial position.

Strategic Thinking - Mr. Sabaz Mehmet Murat has a well-developed strategic thinking, which allows him to foresee future developments and set long-term objectives, taking into account the potential risks for the Bank and the necessary measures to control them. This aptitude has been cultivated over the years mainly due to his experience in the Banking sector. Self-rated to a high level.

Communication - Mr. Sabaz Mehmet Mehmet Murat is able to effectively communicate ideas and decisions in an appropriate form, establishing

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relationships with colleagues that contribute to the achievement of goals. Similarly, he communicates thoughts clearly and articulately, using professional and understandable language. Decision making ability - being in managerial positions, Mr. Sabaz Mehmet Murat has developed both individual and collective decision making abilities, he is able to make decisions in emergency situations. He has cultivated this ability during his time as a member of the management bodies in several Banks. He knows how to distinguish trivial situations from those that require more attention due to their significance or the risks they entail, and makes decisions accordingly. Mr. Sabaz Mehmet Murat asks relevant questions in order to obtain a clear and complete picture of the situation under decision. Judgment - is able to identify and establish appropriate decision-making methods and processes, rated by him/her at the highest level. He/she can formulate logical conclusions as a result of analyzing different categories of information. Moreover, in the process of analyzing, he has a broad perspective, not limited only to his area of responsibility

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33.3% of the Board members are independent.

33.3% is the gender diversity rate at Board level.

### Board of directors structure by gender and age

Board of Directors of BCR Chisinau	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	1	33,3%	1	33,3%
>50 years	1	33,3%	1	33,3%	2	66,7%
<b>Total</b>	<b>1</b>	<b>33,3%</b>	<b>2</b>	<b>66,7</b>	<b>3</b>	<b>100</b>

33.3% of the Board members are independent.

33.3% is the gender diversity rate at Board level.

### Board of directors structure by gender and age

Board of Directors of BCR Chisinau	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	1	33,3%	1	33,3%
>50 years	1	33,3%	1	33,3%	2	66,7%
<b>Total</b>	<b>1</b>	<b>33,3%</b>	<b>2</b>	<b>66,7</b>	<b>3</b>	<b>100</b>

### Members of the Executive Committee

Name	Position	Member type	Nationality	Duration	Relevance of experience to the company's sector, products and location
Vasile Donica-	President of the Executive Committee	Executive	Romanian	1	Vasile Donica graduated from the Academy of Economic Studies of Moldova, Faculty of Finance, Specialization: Banks and Stock Exchanges, having adequate knowledge of the nature, scope and complexity of the Bank's activity and the responsibilities entrusted to him  His professional activity has been carried out in distinct areas, which shows a great capacity to evolve and manage unpredictability.

Among the duties that derive from the position held are:  
 Meeting the objectives set by the Board of Directors;  
 Representing the Bank in the external environment;  
 Working with the Bank's clients, attracting new clients / retaining existing ones;  
 Developing new products and services offered by the Bank;

Victoria Revenco	Member	Executive	Romanian	4	As an executive member of the Executive Committee, the main responsibility is to ensure the smooth running of the Bank's activities, business development and implementation of the resolutions adopted at the GMS, SB meetings. It manages strategic projects in IT development, electronic cards and channels, operations, property management, procurement.
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Executive Committee structure by gender and age

Executive Committee at BCR Chisinau	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	1	50	1	50	2	100
>50 years	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>50</b>	<b>1</b>	<b>50</b>	<b>2</b>	<b>100</b>

50% is the rate of gender diversity at Executive Board level

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Members of the Supervisory Board

Name	Position	Membership type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Catalin Caragea	Chairman SB	Non-executive	Romanian	4 years	Mr. Caragea is a graduate of the Bucharest Academy of Economic Studies, Faculty of Management and holds a Master's degree in Capital Market Transactions and Regulation and a specialization from the Bled School of Management. <b>Mr. Caragea</b> has more than 20 years of relevant experience in the financial-banking market in banks in Romania and abroad - Raiffeisen Bank Romania, BCR and Erste Group Vienna, currently holding the position of Deputy General Manager - CRO at Banca Transilvania
Diana Mazurchievici	SB member	Non-executive	Romanian	4 years	Ms. Mazurchievici is a graduate of the Bucharest Academy of Economic Studies, Faculty of Finance, Banking and Stock Exchanges and of an Executive MBA program at the Maastricht School of Management. Ms. Mazurchievici is a member of the Association of Chartered Certified Accountants (A.C.C.A.) in the United Kingdom and a member of the Romanian Chamber of Financial Auditors. She joined the financial-banking sector in 2017.
Corina Stoica	SB member	Non-executive	Romanian	4 years	Ms. Stoica is a graduate of the Bucharest Academy of Economic Studies, Faculty of Finance, Banking and Accounting, as well as of numerous specialized courses, including an MBA program in Finance at the University of

Sheffield in the United Kingdom. He has over 20 years of experience in the Romanian financial-banking industry, mainly in the areas of treasury, capital markets, investment banking, asset management and private banking.

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## Supervisory Board

Supervisory Board	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0					
30-50 years	2	66.67%	1	33.33%	3	100%
>50 years	0					
<b>Total</b>	<b>2</b>	<b>66.67%</b>	<b>1</b>	<b>33.33%</b>	<b>3</b>	<b>100%</b>

## Members of the Executive Committee

Name	Position	Member type	Nationality	Duration	Relevance of experience to the company's sector, products and location
Dan Marius Popovici	General Manager & Chairman of the Management Board	Executive	Romanian	4 years	<p>With over 25 years of experience in the capital markets, Dan has been involved in numerous projects on structuring public offerings of securities such as equities, corporate and municipal bonds and also in investment fund management. As CEO of OTP Asset Management Romania, he is responsible for the development of the company's medium and long term strategy, being actively involved in the projects it undertakes. Dan graduated from the Polytechnic University of Bucharest, specializing in "Economic Engineering" and completed his postgraduate studies in "Financial Management and Capital Markets" at the Bucharest Academy of Economic Studies.</p>
Adrian Anghel	Deputy General Manager	Executive	Romanian	4 years	<p>With over 18 years of experience in asset management, Adrian joined the team to manage and improve the fund sales process. His experience gained in key positions in the industry, operating in local and international financial markets is an advantage in dealing with investors, in diversifying distribution channels, as well as in developing the product range and positioning. His background brings added value to the financial education campaigns that the company supports. Adrian is a graduate of the Faculty of Finance, Insurance, Banking and Stock Exchanges at the Academy of Economic Studies.</p>

Dragos Manolescu Deputy  
General  
Manager Executive Romanian 4 years

Dragoş has in-depth knowledge acquired through specialization programs in the financial field: CFA Program; postgraduate studies of Master in International Project Management organized by the Academy of Economic Studies Bucharest. Dragoş brings added value to the team, having more than 18 years of experience in the Capital Markets department of banking groups and asset management teams, where he was actively involved in the rebranding of investment funds and portfolio rebalancing. His area of expertise is mainly in fixed income and listed equity portfolios.

#### Executive Committee structure by gender and age

Executive Committee	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	2	66.67%	2	66.67%
>50 years	0	0	1	33.33%	1	33.33%
<b>Total</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>100%</b>	<b>3</b>	<b>100.00%</b>

The management structure of OTP Asset Management S.A. is the only non-banking subsidiary in the consolidation perimeter managed in a dualistic system, as follows:

→ the supervisory committee with an exclusively supervisory function - the Supervisory Board, composed of 3 non-executive members, and

→ Management Board of 3 executive members with skills of coordinating the entire activity of the company.

The entire management is subject to the approval of the ASF and must go through the suitability procedure in order to be able to execute the mandate granted by the general meeting of shareholders.



The authorization of the Management is a condition precedent to the exercise of their mandate, any act concluded prior to this condition being considered invalid.

## Avant Leasing

### Board of Directors

Name	Position	Membership type	Nationality	Term of office	Relevance of experience to the company's sector, products and location
Tiberiu Moisa	Chairman	Non-executive	Romanian	4 years	graduate of the Faculty of Finance, Insurance, Banking and Stock Exchanges, an executive MBA from INDE and another one from Sheffield University, more than 20 years of experience in the banking sector and in top management positions, currently Deputy General Manager of MidCorporate & SME within Banca Transilvania
George Calinescu	Member	Non-executive	Romanian	4 years	graduate of the Faculty of Economics, senior member of ACCA, with more than 20 years of experience in banking and current Deputy CEO, CFO at Banca Transilvania
Dan Manolescu	Member	Non-executive	Romanian	4 years	Graduated from the Academy of Economic Studies, PhD in Economics (title awarded by A.S.E. Bucharest) with extensive experience in the financial and tax fields. Since 2007 he is Tax Consultant, member of the Chamber of Tax Consultants in Romania where he currently holds the position of Chairman. Since 2008 he is also a Financial Auditor holding various positions in the management structures of financial institutions

### Supervisory Board structure by gender and age

Board	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years						

30-50 years		0%	3	100%	3	100%
>50 years						
<b>Total</b>	<b>0</b>	<b>0%</b>	<b>3</b>	<b>100%</b>	<b>3</b>	<b>100%</b>

#### Members of the Executive Committee

Name	Position	Type	Nationality	Duration	Relevance of experience to the company's sector, products and location
Corina Portase	Leader	Executive	Romanian	2 years	over 25 years of experience in the financial and banking sector, especially in the field of financial leasing, with focus in risk management, graduate of Academy of Economic Studies, with over 20 years of experience in top management positions in financial groups such as Porsche Finance Group, Idea Bank Group and Banca Transilvania.
Liviu Serban	Leader	Executive	Romanian	2 years	more than 25 years of experience in sales management, completed by 15 years in top management positions in the financial sector, in particular in Idea Leasing or BT leasing companies, Executive MBA graduate from the Vienna University of Economics and Business.

#### Executive Committee structure by gender and age

Committee	Women		Men		Total	
	No.	%	No.	%	No.	%
<30 years						
30-50 years	1	50%	1	50%	2	100%
>50 years						
<b>Total</b>	<b>1</b>	<b>50%</b>	<b>1</b>	<b>50%</b>	<b>2</b>	<b>100%</b>









4.2. GAR – Information by sector

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																									
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD			
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount			
Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		
1	C 2910 Manufacture of motor vehicles	288.41	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	288.41	0.00		
2	F 4120 Construction of residential and non-residential buildings	245.06	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	245.06	0.00		
3	D 3522 Distribution of gaseous fuels through mains	237.12	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	237.12	0.00		
4	D 3523 Trade of gas through mains	228.09	78.11			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	228.09	78.11		
5	C 2442 Aluminium production	203.14	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	203.14	0.00		
6	C 2751 Manufacture of electric domestic appliances	194.85	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	194.85	0.00		
7	H 5320 Other postal and courier activities	183.82	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	183.82	0.00		
8	D 3514 Trade of electricity	1.13	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	1.13	0.00		
9	D 3513 Distribution of electricity	95.34	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	95.34	0.00		
10	C 2221 Manufacture of plastic plates, sheets, tubes and profiles	134.50	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	134.50	0.00		
11	C 2381 Manufacture of concrete products for construction purposes	127.36	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	127.36	0.00		
12	N 7711 Renting and leasing of cars and light motor vehicles	124.95	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	124.95	0.00		
13	J 6110 Wired telecommunications activities	124.33	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	124.33	0.00		
14	C 2223 Manufacture of builders' ware of plastic	85.81	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	85.81	0.00		
15	J 6120 Wireless telecommunications activities	0.55	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.55	0.00		
16	C 3020 Manufacture of railway locomotives and rolling stock	55.89	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	55.89	0.00		
17	C 2511 Manufacture of metal structures and parts of structures	49.98	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	49.98	0.00		
18	H 5110 Passenger air transport	43.62	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	43.62	0.00		
19	C 2932 Manufacture of other parts and accessories for motor vehicles	41.63	0.00			0.00	0.00			0.00	0.00			147.01	0.00			0.00	0.00			0.00	0.00	188.64	0.00		
20	H 4920 Freight rail transport	36.25	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	36.25	0.00		
21	C 2732 Manufacture of other electronic and electric wires and cables	34.93	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	34.93	0.00		
22	C 2383 Manufacture of ready-mixed concrete	22.72	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	22.72	0.00		
23	E 3811 Collection of non-hazardous waste	16.43	0.00			0.00	0.00			0.00	0.00			-0.01	0.00			0.00	0.00			0.00	0.00	16.42	0.00		
24	C 2612 Manufacture of loaded electronic boards	15.89	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	15.89	0.00		
25	C 2015 Manufacture of fertilisers and nitrogen compounds	15.55	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	15.55	0.00		
26	H 5224 Cargo handling	0.15	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.15	0.00		
27	F 4321 Electrical installation	7.73	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	7.73	0.00		
28	E 3600 Water collection, treatment and supply	6.42	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	6.42	0.00		
29	C 3030 Manufacture of air and spacecraft and related machinery	5.86	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	5.86	0.00		
30	C 2341 Manufacture of ceramic household and ornamental articles	4.86	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	4.86	0.00		
31	H 4931 Urban and suburban passenger land transport	4.65	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	4.65	0.00		
32	C 2815 Manufacture of bearings, gears, gearing and driving elements	3.24	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	3.24	0.00		
33	M 7120 Technical testing and analysis	3.16	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	3.16	0.00		
34	M 7112 Engineering activities and related technical consultancy	3.08	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	3.08	0.00		
35	F 4222 Construction of utility projects for electricity and telecommunications	2.26	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	2.26	0.00		
36	L 6832 Management of real estate on a fee or contract basis	1.44	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	1.44	0.00		

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)				
37	H 4910 Passenger rail transport, interurban	1.05	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	1.05	0.00				
38	C 2572 Manufacture of locks and hinges	0.96	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.96	0.00				
39	C 2351 Manufacture of cement	0.93	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.93	0.00				
40	C 2420 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.70	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.70	0.00				
41	C 2611 Manufacture of electronic components	0.69	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.69	0.00				
42	J 6311 Data processing, hosting and related activities	0.23	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.23	0.00				
43	C 2813 Manufacture of other pumps and compressors	0.22	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.22	0.00				
44	C 2229 Manufacture of other plastic products	0.22	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.22	0.00				
45	H 4941 Freight transport by road	0.18	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.18	0.00				
46	C 3011 Building of ships and floating structures	0.16	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.16	0.00				
47	C 2550 Forging, pressing, stamping and roll-forming of metal, powder metallurgy	0.12	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.12	0.00				
48	C 2931 Manufacture of electrical and electronic equipment for motor vehicles	0.09	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.09	0.00				
49	F 4211 Construction of roads and motorways	0.07	0.00			142.47	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	142.54	0.00				
50	F 4299 Construction of other civil engineering projects nec	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.00	0.00				
51	C 2825 Manufacture of non-domestic cooling and ventilation equipment	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.00	0.00				
52	C 3317 Repair and maintenance of other transport equipment	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.00	0.00				
53	D 3511 Production of electricity	-0.72	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	-0.72	0.00				
54	H 5310 Postal activities under universal service obligation	-0.05	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	-0.05	0.00				
55	B 0910 Support activities for petroleum and natural gas extraction	0.00	0.00			2.36	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	2.36	0.00				
56	C 1011 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00		31.67	0.00			0.00	0.00			0.00	0.00		31.67	0.00				
57	C 1012 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00		86.64	0.00			0.00	0.00			0.00	0.00		86.64	0.00				
58	C 1013 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00		22.38	0.00			0.00	0.00			0.00	0.00		22.38	0.00				
59	C 1061 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00		13.25	0.00			0.00	0.00			0.00	0.00		13.25	0.00				
60	C 1071 Manufacture of bread, manufacture of fresh pastry goods and cakes	0.00	0.00			0.00	0.00			0.00	0.00		0.41	0.00			0.00	0.00			0.00	0.00		0.41	0.00				
61	C 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	0.00	0.00			0.00	0.00			0.00	0.00		10.49	0.00			0.00	0.00			0.00	0.00		10.49	0.00				
62	C 1105 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00		2.79	0.00			0.00	0.00			0.00	0.00		2.79	0.00				
63	C 1107 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00		168.86	0.00			0.00	0.00			0.00	0.00		168.86	0.00				
64	C 1413 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00		0.60	0.00			0.00	0.00			0.00	0.00		0.60	0.00				
65	C 1520 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00		0.00	0.00			0.00	0.00			0.00	0.00		0.00	0.00				
66	C 1712 Manufacture of paper and paperboard	0.00	0.00			0.00	0.00			0.00	0.00		23.41	0.00			0.00	0.00			0.00	0.00		23.41	0.00				
67	C 2110 Manufacture of basic pharmaceutical products	0.00	0.00			0.00	0.00			0.00	0.00		0.00	0.00			33.74	0.00			0.00	0.00		33.74	0.00				
68	C 2120 Manufacture of pharmaceutical preparations	0.00	0.00			0.00	0.00			0.00	0.00		0.00	0.00			0.33	0.00			0.00	0.00		0.33	0.00				
69	C 3102 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00		8.10	0.00			0.00	0.00			0.00	0.00		8.10	0.00				
70	C 3109 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00		23.70	0.00			0.00	0.00			0.00	0.00		23.70	0.00				
71	G 4621 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	0.00	0.00			0.00	0.00			0.00	0.00		1.05	0.00			0.00	0.00			0.00	0.00		1.05	0.00				





2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2023																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		
1	D 35.23 Trade of gas through mains	254.18	36.26	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	254.18	36.26	-	-	
2	D 35.13 Distribution of electricity	251.79	12.47	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	251.79	12.47	-	-	
3	D 35.22 Distribution of gaseous fuels through mains	101.46	0.79	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	101.46	0.79	-	-	
4	C 19.20 Manufacture of refined petroleum products	-	0.17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.17	-	-	
5	H 49.50 Transport via pipeline	24.77	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24.77	-	-	-	
6	C 27.51 Manufacture of electric domestic appliances	202.32	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	202.32	-	-	-	
7	D 35.14 Trade of electricity	187.23	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	187.23	-	-	-	
8	H 53.20 Other postal and courier activities	145.41	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	145.41	-	-	-	
9	F 41.20 Construction of residential and non-residential buildings	128.98	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	128.98	-	-	-	
10	C 24.42 Aluminium production	75.06	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	75.06	-	-	-	
11	C 23.61 Manufacture of concrete products for construction purposes	87.45	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	87.45	-	-	-	
12	H 51.10 Passenger air transport	65.43	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	65.43	-	-	-	
13	C 29.32 Manufacture of other parts and accessories for motor vehicles	57.31	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	57.31	-	-	-	
14	H 49.20 Freight rail transport	35.68	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	35.68	-	-	-	
15	C 23.63 Manufacture of ready-mixed concrete	32.27	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	32.27	-	-	-	
16	C 20.15 Manufacture of fertilisers and nitrogen compounds	31.60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	31.60	-	-	-	
17	C 22.23 Manufacture of builders' ware of plastic	30.69	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	30.69	-	-	-	
18	C 25.11 Manufacture of metal structures and parts of structures	30.25	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	30.25	-	-	-	
19	F 43.21 Electrical installation	30.21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	30.21	-	-	-	
20	J 61.20 Wireless telecommunications activities	27.82	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	27.82	-	-	-	
21	E 38.11 Collection of non-hazardous waste	26.44	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	26.44	-	-	-	
22	C 30.30 Manufacture of air and spacecraft and related machinery	24.80	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24.80	-	-	-	
23	C 27.32 Manufacture of other electronic and electric wires and cables	18.27	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.27	-	-	-	
24	H 52.24 Cargo handling	12.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12.03	-	-	-	
25	C 16.21 Manufacture of veneer sheets and wood-based panels	9.63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.63	-	-	-	
26	C 24.53 Casting of light metals	4.92	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.92	-	-	-	
27	F 42.22 Construction of utility projects for electricity and telecommunications	4.72	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.72	-	-	-	
28	C 28.15 Manufacture of bearings, gears, gearing and driving elements	3.67	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.67	-	-	-	
29	M 71.12 Engineering activities and related technical consultancy	3.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.10	-	-	-	
30	C 27.12 Manufacture of electricity distribution and control apparatus	2.69	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.69	-	-	-	
31	C 22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	2.28	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.28	-	-	-	
32	C 30.20 Manufacture of railway locomotives and rolling stock	2.05	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.05	-	-	-	
33	M 71.20 Technical testing and analysis	1.59	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.59	-	-	-	
34	C 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	1.41	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.41	-	-	-	
35	C 25.72 Manufacture of locks and hinges	1.27	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.27	-	-	-	
36	C 24.20 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	1.09	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.09	-	-	-	
37	C 29.10 Manufacture of motor vehicles	0.40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.40	-	-	-	
38	J 62.01 Computer programming activities	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.39	-	-	-	



### 4.3. KPI GAR regarding stock

3. GAR KPI concerning stock (Turnover)																														
Year End at 31.12.2024																														
	GAR - Covered assets in both numerator and denominator	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			Proportion of total assets covered				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)										
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
% (compared to total covered assets in the denominator)		Of which Use of Proceeds		Of which transitional		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional		Of which enabling						
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	6.35%	1.34%	1.34%	-	0.15%	3.35%	0.02%	-	-	-	-	3.87%	-	-	-	0.06%	-	-	-	0.08%	-	-	-	13.57%	1.34%	1.34%	-	0.15%	49.75%
2	<b>Financial undertakings</b>	-	-	-	-	-	-	0.09%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11.98%
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.90%
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.10%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	0.36%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.98%
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.69%
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.55%
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%
17	Loans and advances	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	39.31%	1.12%	1.12%	-	1.12%	2.12%	-	-	-	-	-	29.53%	-	-	-	0.49%	-	-	-	0.61%	-	-	-	70.99%	1.12%	1.12%	-	1.12%	6.52%
21	Loans and advances	38.65%	1.14%	1.14%	-	1.14%	2.14%	-	-	-	-	-	29.85%	-	-	-	0.50%	-	-	-	0.62%	-	-	-	71.76%	1.14%	1.14%	-	1.14%	6.45%
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	2.43%	2.43%	2.43%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.43%	2.43%	2.43%	-	-	-	24.41%
25	of which loans collateralised by residential immovable property	2.44%	2.44%	2.44%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.59%	0.59%	0.59%	-	-	-	24.32%
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.09%
28	<b>Local governments financing</b>	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%
32	<b>Total GAR assets</b>	3.16%	0.67%	0.67%	-	0.07%	1.66%	0.01%	-	-	-	-	1.92%	-	-	-	0.03%	-	-	-	0.04%	-	-	-	6.76%	0.67%	0.67%	-	0.07%	49.79%

3. KPI GAR regarding stock (Turnover)

		Year End at 31.12.2023																								Proportion of total assets covered						
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
% (compared to total covered assets in the denominator)			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling				
<b>GAR - Covered assets in both numerator and denominator</b>																																
1	Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	5.95%	2.39%	2.36%	-	0.09%	1.54%	-	-	-	-	-	3.99%	-	-	-	-	-	-	-	-	0.07%	-	-	-	-	11.55%	2.39%	2.36%	-	0.09%	57.60%
2	<b>Financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10.75%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8.53%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.18%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.34%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.22%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.52%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.38%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	<b>Non-financial undertakings</b>	32.02%	0.83%	0.53%	-	0.83%	0.33%	-	-	-	-	-	35.77%	-	-	-	-	-	-	-	-	0.65%	-	-	-	68.76%	0.83%	0.53%	-	0.83%	6.43%	
21	Loans and advances	32.36%	0.84%	0.54%	-	0.84%	0.33%	-	-	-	-	-	36.14%	-	-	-	-	-	-	-	-	0.65%	-	-	-	69.48%	0.84%	0.54%	-	0.84%	6.36%	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	<b>Households</b>	5.89%	5.89%	5.89%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.89%	5.89%	5.89%	-	-	22.51%		
25	of which loans collateralised by residential immovable property	5.91%	5.91%	5.91%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.33%	1.33%	1.33%	-	-	22.43%		
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
28	<b>Local governments financing</b>	0.23%	-	-	-	-	4.84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.08%	-	-	-	-	17.92%		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.23%	-	-	-	-	4.84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.08%	-	-	-	-	17.92%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.03%		
32	<b>Total GAR assets</b>	3.42%	1.38%	1.36%	-	0.05%	0.89%	-	-	-	-	-	2.30%	-	-	-	-	-	-	-	-	0.04%	-	-	-	6.65%	1.38%	1.36%	-	0.05%	57.64%	

4.4. KPI GAR regarding flow

4. GAR KPI regarding flow (Turnover)		Year End at 31.12.2024																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			Proportion of total new assets covered							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)													
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)													
% (compared to flow of total eligible assets)					Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling									
	<b>GAR - Covered assets in both numerator and denominator</b>																															
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	25.05%	5.40%	5.40%	-	4.26%	8.24%	-	-	-	-	-	-	-	8.56%	-	-	-	-	-	-	-	-	-	-	-	42.29%	5.40%	5.40%	-	4.26%	17.43%
2	<b>Financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.78%
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.32%
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.46%
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.59%
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.41%
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	-	0.11%
17	Loans and advances	-	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	-	0.11%
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	46.33%	8.27%	8.27%	-	8.27%	1.74%	-	-	-	-	-	-	-	16.60%	-	-	-	0.83%	-	-	-	-	-	-	-	65.51%	8.27%	8.27%	-	8.27%	13.30%
21	Loans and advances	46.18%	8.29%	8.29%	-	8.29%	1.75%	-	-	-	-	-	-	-	16.65%	-	-	-	0.84%	-	-	-	-	-	-	-	65.41%	8.29%	8.29%	-	8.29%	13.26%
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	0.04%
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	4.31%	4.31%	4.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.31%	4.31%	4.31%	-	-	6.80%
25	of which loans collateralised by residential immovable property	4.46%	4.46%	4.46%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.46%	4.46%	4.46%	-	-	6.57%
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.23%
28	<b>Local governments financing</b>	0.21%	-	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	-	1.90%
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	0.21%	-	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	-	1.90%
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%
32	<b>Total GAR assets</b>	6.46%	1.39%	1.39%	-	1.10%	2.12%	-	-	-	-	-	-	-	2.21%	-	-	-	0.11%	-	-	-	-	-	-	-	10.90%	1.39%	1.39%	0%	1%	25.89%

4. GAR KPI regarding flow (Turnover)

		Year End at 31.12.2023																								Proportion of total new assets covered			
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)								
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)								
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)								
% (compared to flow of total eligible assets)			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling					
<b>GAR - Covered assets in both numerator and denominator</b>																													
1	Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	14.86%	9.54%	8.21%	-	1.33%	5.82%	-	-	-	-	-	8.19%	-	-	-	-	-	-	-	-	-	-	28.86%	9.54%	8.21%	-	1.33%	17.58%
2	<b>Financial undertakings</b>	-	-	-	-	-	<b>0.55%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>0.55%</b>	-	-	-	-	<b>6.64%</b>
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.51%
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.45%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	0.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.12%
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.90%
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.90%
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	24.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.15%
17	Loans and advances	-	-	-	-	-	24.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.15%
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	<b>24.70%</b>	<b>4.94%</b>	-	-	<b>4.94%</b>	<b>0.13%</b>	-	-	-	-	-	<b>30.46%</b>	-	-	-	-	-	-	-	-	-	-	<b>55.29%</b>	<b>4.94%</b>	-	-	<b>4.94%</b>	<b>8.45%</b>
21	Loans and advances	24.70%	4.94%	-	-	4.94%	0.13%	-	-	-	-	-	30.46%	-	-	-	-	-	-	-	-	-	-	55.29%	4.94%	-	-	4.94%	8.45%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	<b>17.72%</b>	<b>17.72%</b>	<b>17.72%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>17.72%</b>	<b>17.72%</b>	<b>17.72%</b>	-	-	<b>14.56%</b>
25	of which loans collateralised by residential immovable property	17.98%	17.98%	17.98%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.98%	17.98%	17.98%	-	-	14.36%
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.21%
28	<b>Local governments financing</b>	<b>0.13%</b>	-	-	-	-	<b>99.87%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>100.00%</b>	-	-	-	-	<b>1.78%</b>
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	0.13%	-	-	-	-	99.87%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	1.78%
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13%
32	<b>Total GAR assets</b>	<b>4.67%</b>	<b>3.00%</b>	<b>2.58%</b>	-	<b>0.42%</b>	<b>1.83%</b>	-	-	-	-	-	<b>2.57%</b>	-	-	-	-	-	-	-	-	-	-	<b>9.07%</b>	<b>3.00%</b>	<b>2.58%</b>	-	<b>0.42%</b>	<b>31.57%</b>















4.8. GAR – Information by sector (CapEx)

2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2024																									
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD			
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount			
Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)				
1	H 4950 Transport via pipeline	519.03	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	519.03	0.00		
2	C 2910 Manufacture of motor vehicles	288.41	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	288.41	0.00		
3	F 4120 Construction of residential and non-residential buildings	245.06	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	245.06	0.00		
4	D 3522 Distribution of gaseous fuels through mains	237.15	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	237.15	0.00		
5	D 3523 Trade of gas through mains	228.09	78.11			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	228.09	78.11		
6	C 2442 Aluminium production	157.63	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	157.63	0.00		
7	C 2751 Manufacture of electric domestic appliances	194.85	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	194.85	0.00		
8	H 5320 Other postal and courier activities	183.82	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	183.82	0.00		
9	D 3514 Trade of electricity	2.42	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	2.42	0.00		
10	D 3513 Distribution of electricity	84.20	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	84.20	0.00		
11	C 2221 Manufacture of plastic plates, sheets, tubes and profiles	134.50	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	134.50	0.00		
12	C 2361 Manufacture of concrete products for construction purposes	127.36	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	127.36	0.00		
13	N 7711 Renting and leasing of cars and light motor vehicles	124.95	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	124.95	0.00		
14	J 6110 Wired telecommunications activities	124.33	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	124.33	0.00		
15	C 2223 Manufacture of builders' ware of plastic	85.81	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	85.81	0.00		
16	J 6120 Wireless telecommunications activities	0.16	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	0.16	0.00		
17	C 3020 Manufacture of railway locomotives and rolling stock	55.89	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	55.89	0.00		
18	C 2511 Manufacture of metal structures and parts of structures	49.98	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	49.98	0.00		
19	H 5110 Passenger air transport	43.62	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	43.62	0.00		
20	C 2932 Manufacture of other parts and accessories for motor vehicles	41.63	0.00			0.00	0.00			0.00	0.00		147.01	0.00			0.00	0.00			0.00	0.00	188.64	0.00			
21	H 4920 Freight rail transport	36.25	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	36.25	0.00		
22	C 2732 Manufacture of other electronic and electric wires and cables	34.93	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	34.93	0.00		
23	C 2363 Manufacture of ready-mixed concrete	22.72	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	22.72	0.00		
24	E 3811 Collection of non-hazardous waste	16.43	0.00			0.00	0.00			0.00	0.00		(0.01)	0.00			0.00	0.00			0.00	0.00	16.42	0.00			
25	C 2612 Manufacture of loaded electronic boards	15.89	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	15.89	0.00		
26	C 2015 Manufacture of fertilisers and nitrogen compounds	15.55	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	15.55	0.00		
27	H 5224 Cargo handling	7.60	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	7.60	0.00		
28	F 4321 Electrical installation	7.73	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	7.73	0.00		
29	E 3600 Water collection, treatment and supply	6.42	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	6.42	0.00		
30	C 3030 Manufacture of air and spacecraft and related machinery	5.86	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	5.86	0.00		
31	C 2341 Manufacture of ceramic household and ornamental articles	4.86	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	4.86	0.00		
32	H 4931 Urban and suburban passenger land transport	4.65	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	4.65	0.00		
33	C 2815 Manufacture of bearings, gears, gearing and driving elements	3.24	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	3.24	0.00		
34	M 7120 Technical testing and analysis	3.16	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	3.16	0.00		
35	M 7112 Engineering activities and related technical consultancy	3.08	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	3.08	0.00		
36	F 4222 Construction of utility projects for electricity and telecommunications	2.26	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	2.26	0.00		
37	L 6832 Management of real estate on a fee or contract basis	1.44	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00	1.44	0.00		

2. GAR – Information by sector (CapEx)

		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
38	H 4910 Passenger rail transport, interurban	1.05	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			1.05	0.00		
39	C 2572 Manufacture of locks and hinges	0.96	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.96	0.00		
40	H 4950 Transport via pipeline	519.03	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			519.03	0.00		
41	C 2420 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.70	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.70	0.00		
42	C 2611 Manufacture of electronic components	0.69	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.69	0.00		
43	J 6311 Data processing, hosting and related activities	0.23	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.23	0.00		
44	C 2813 Manufacture of other pumps and compressors	0.22	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.22	0.00		
45	C 2229 Manufacture of other plastic products	0.22	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.22	0.00		
46	H 4941 Freight transport by road	0.18	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.18	0.00		
47	C 3011 Building of ships and floating structures	0.16	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.16	0.00		
48	C 2550 Forging, pressing, stamping and roll-forming of metal, powder metallurgy	0.12	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.12	0.00		
49	C 2931 Manufacture of electrical and electronic equipment for motor vehicles	0.09	0.00			142.47	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			142.56	0.00		
50	F 4211 Construction of roads and motorways	0.07	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.07	0.00		
51	F 4299 Construction of other civil engineering projects nec	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
52	C 2825 Manufacture of non-domestic cooling and ventilation equipment	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
53	C 3317 Repair and maintenance of other transport equipment	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
54	D 3511 Production of electricity	-0.72	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			-0.72	0.00		
55	H 5310 Postal activities under universal service obligation	-0.05	0.00			2.36	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			2.31	0.00		
56	B 0910 Support activities for petroleum and natural gas extraction	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
57	C 1011 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00			31.67	0.00			0.00	0.00			0.00	0.00			31.67	0.00		
58	C 1012 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00			86.64	0.00			0.00	0.00			0.00	0.00			86.64	0.00		
59	C 1013 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00			22.38	0.00			0.00	0.00			0.00	0.00			22.38	0.00		
60	C 1061 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00			13.25	0.00			0.00	0.00			0.00	0.00			13.25	0.00		
61	C 1071 Manufacture of bread, manufacture of fresh pastry goods and cakes	0.00	0.00			0.00	0.00			0.00	0.00			0.41	0.00			0.00	0.00			0.00	0.00			0.41	0.00		
62	C 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	0.00	0.00			0.00	0.00			0.00	0.00			10.49	0.00			0.00	0.00			0.00	0.00			10.49	0.00		
63	C 1105 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00			2.79	0.00			0.00	0.00			0.00	0.00			2.79	0.00		
64	C 1107 Marketplace for the trade of second-hand goods for reuse	0.00	0.00			0.00	0.00			0.00	0.00			168.86	0.00			0.00	0.00			0.00	0.00			168.86	0.00		
65	C 1413 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00			0.60	0.00			0.00	0.00			0.00	0.00			0.60	0.00		
66	C 1520 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
67	C 1712 Manufacture of paper and paperboard	0.00	0.00			0.00	0.00			0.00	0.00			23.41	0.00			0.00	0.00			0.00	0.00			23.41	0.00		
68	C 2110 Manufacture of basic pharmaceutical products	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			33.74	0.00			0.00	0.00			33.74	0.00		
69	C 2120 Manufacture of pharmaceutical preparations	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.33	0.00			0.00	0.00			0.33	0.00		
70	C 3102 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00			8.10	0.00			0.00	0.00			0.00	0.00			8.10	0.00		
71	C 3109 Repair, refurbishment and remanufacturing	0.00	0.00			0.00	0.00			0.00	0.00			23.70	0.00			0.00	0.00			0.00	0.00			23.70	0.00		
72	G 4621 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	0.00	0.00			0.00	0.00			0.00	0.00			1.05	0.00			0.00	0.00			0.00	0.00			1.05	0.00		
73	G 4635 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			2.78	0.00			0.00	0.00			0.00	0.00			2.78	0.00		

2. GAR – Information by sector (CapEx)

		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (WTR + CE + PPC + BIO)
74	G 4639 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			24.85	0.00			0.00	0.00			0.00	0.00			24.85	0.00		
75	G 4645 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			(0.04)	0.00			0.00	0.00			0.00	0.00			-0.04	0.00		
76	G 4646 Wholesale of pharmaceutical goods	0.00	0.00			0.00	0.00			0.00	0.00			2.18	0.00			0.00	0.00			0.00	0.00			2.18	0.00		
77	G 4671 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			0.26	0.00			0.00	0.00			0.00	0.00			0.26	0.00		
78	G 4673 Wholesale of wood, construction materials and sanitary equipment	0.00	0.00			0.00	0.00			0.00	0.00			0.49	0.00			0.00	0.00			0.00	0.00			0.49	0.00		
79	G 4674 Wholesale of hardware, plumbing and heating equipment and supplies	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
80	G 4677 Wholesale of waste and scrap	0.00	0.00			0.00	0.00			0.00	0.00			2.96	0.00			0.00	0.00			0.00	0.00			2.96	0.00		
81	G 4690 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			10.11	0.00			0.00	0.00			0.00	0.00			10.11	0.00		
82	G 4711 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			1,384.03	0.00			0.00	0.00			0.00	0.00			1,384.03	0.00		
83	G 4719 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			0.66	0.00			0.00	0.00			0.00	0.00			0.66	0.00		
84	G 4742 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			0.37	0.00			0.00	0.00			0.00	0.00			0.37	0.00		
85	G 4752 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			42.06	0.00			0.00	0.00			0.00	0.00			42.06	0.00		
86	G 4754 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			92.57	0.00			0.00	0.00			0.00	0.00			92.57	0.00		
87	G 4764 Retail sale of sporting equipment in specialised stores	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
88	G 4773 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			1.25	0.00			0.00	0.00			0.00	0.00			1.25	0.00		
89	G 4778 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			2.45	0.00			0.00	0.00			0.00	0.00			2.45	0.00		
90	I 5510 Hotels and similar accommodation	0.00	0.00			1.03	0.00			0.00	0.00			0.00	0.00			0.00	0.00			42.39	0.00			43.42	0.00		
91	O 8425 Fire service activities	0.00	0.00			1.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			1.00	0.00		
92	Q 8690 Other human health activities	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00		
93	G 4775 Sale of spare parts	0.00	0.00			0.00	0.00			0.00	0.00			0.36	0.00			0.00	0.00			0.00	0.00			0.36	0.00		

Breakdown by sector - NACE 4 digits level (code and label)



2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2023																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		IMM-uri și alte SNF care nu fac obiectul Directivei privind prezentarea de informații nefinanciare		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)						
1	D 35.23 Trade of gas through mains	217.03	93.40			-	-			-	-			-	-			-	-			217.03	93.40						
2	D 35.13 Distribution of electricity	-	18.11			-	-			-	-			-	-			-	-			-	18.11						
3	D 35.22 Distribution of gaseous fuels through mains	251.79	12.86			-	-			-	-			-	-			-	-			251.79	12.86						
4	C 19.20 Manufacture of refined petroleum products	227.39	2.38			-	-			-	-			-	-			-	-			227.39	2.38						
5	H 49.50 Transport via pipeline	18.58	-			-	-			-	-			-	-			-	-			18.58	-						
6	C 27.51 Manufacture of electric domestic appliances	202.32	-			-	-			-	-			-	-			-	-			202.32	-						
7	D 35.14 Trade of electricity	187.23	-			-	-			-	-			-	-			-	-			187.23	-						
8	H 53.20 Other postal and courier activities	145.41	-			-	-			-	-			-	-			-	-			145.41	-						
9	F 41.20 Construction of residential and non-residential buildings	128.98	-			-	-			-	-			-	-			-	-			128.98	-						
10	C 24.42 Aluminium production	35.79	-			-	-			-	-			-	-			-	-			35.79	-						
11	C 23.61 Manufacture of concrete products for construction purposes	87.45	-			-	-			-	-			-	-			-	-			87.45	-						
12	H 51.10 Passenger air transport	65.43	-			-	-			-	-			-	-			-	-			65.43	-						
13	C 29.32 Manufacture of other parts and accessories for motor vehicles	57.31	-			-	-			-	-			-	-			-	-			57.31	-						
14	H 49.20 Freight rail transport	35.68	-			-	-			-	-			-	-			-	-			35.68	-						
15	C 23.63 Manufacture of ready-mixed concrete	32.27	-			-	-			-	-			-	-			-	-			32.27	-						
16	C 20.15 Manufacture of fertilisers and nitrogen compounds	31.60	-			-	-			-	-			-	-			-	-			31.60	-						
17	C 22.23 Manufacture of builders' ware of plastic	30.69	-			-	-			-	-			-	-			-	-			30.69	-						
18	C 25.11 Manufacture of metal structures and parts of structures	30.25	-			-	-			-	-			-	-			-	-			30.25	-						
19	F 43.21 Electrical installation	30.21	-			-	-			-	-			-	-			-	-			30.21	-						
20	J 61.20 Wireless telecommunications activities	27.82	-			-	-			-	-			-	-			-	-			27.82	-						
21	E 38.11 Collection of non-hazardous waste	26.44	-			-	-			-	-			-	-			-	-			26.44	-						
22	C 30.30 Manufacture of air and spacecraft and related machinery	24.80	-			-	-			-	-			-	-			-	-			24.80	-						
23	C 27.32 Manufacture of other electronic and electric wires and cables	18.27	-			-	-			-	-			-	-			-	-			18.27	-						
24	H 52.24 Cargo handling	12.03	-			-	-			-	-			-	-			-	-			12.03	-						
25	C 16.21 Manufacture of veneer sheets and wood-based panels	9.63	-			-	-			-	-			-	-			-	-			9.63	-						
26	C 24.53 Casting of light metals	4.92	-			-	-			-	-			-	-			-	-			4.92	-						
27	F 42.22 Construction of utility projects for electricity and telecommunications	4.72	-			-	-			-	-			-	-			-	-			4.72	-						
28	C 28.15 Manufacture of bearings, gears, gearing and driving elements	3.67	-			-	-			-	-			-	-			-	-			3.67	-						
29	M 71.12 Engineering activities and related technical consultancy	3.10	-			-	-			-	-			-	-			-	-			3.10	-						
30	C 27.12 Manufacture of electricity distribution and control apparatus	2.69	-			-	-			-	-			-	-			-	-			2.69	-						
31	C 22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	2.28	-			-	-			-	-			-	-			-	-			2.28	-						
32	C 30.20 Manufacture of railway locomotives and rolling stock	2.05	-			-	-			-	-			-	-			-	-			2.05	-						
33	M 71.20 Technical testing and analysis	1.59	-			-	-			-	-			-	-			-	-			1.59	-						
34	C 25.50 Forging, pressing, stamping and roll-forming of metal, powder metallurgy	1.41	-			-	-			-	-			-	-			-	-			1.41	-						
35	C 25.72 Manufacture of locks and hinges	1.27	-			-	-			-	-			-	-			-	-			1.27	-						
36	C 24.20 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	1.09	-			-	-			-	-			-	-			-	-			1.09	-						
37	C 29.10 Manufacture of motor vehicles	0.40	-			-	-			-	-			-	-			-	-			0.40	-						
38	J 62.01 Computer programming activities	0.39	-			-	-			-	-			-	-			-	-			0.39	-						



### 4.9. GAR KPI regarding stock (CapEx)

3, GAR KPI regarding stock (CapEx)		Year End at 31,12,2024																														
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)										
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
% (compared to total covered assets in the denominator)		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling								
<b>GAR - Covered assets in both numerator and denominator</b>																																
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	7.24%	1.34%	1.34%	-	0.15%	3.35%	0.02%	-	-	-	-	-	-	3.98%	-	-	-	0.06%	-	-	-	0.08%	-	-	-	14.57%	1.34%	1.34%	-	0.15%	49.75%
2	<b>Financial undertakings</b>	-	-	-	-	-	-	0.09%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11.98%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.90%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.10%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	0.36%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.98%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.69%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.55%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%	
17	Loans and advances	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	46.09%	1.12%	1.12%	-	1.12%	2.12%	-	-	-	-	-	-	-	30.36%	-	-	-	0.49%	-	-	-	0.61%	-	-	-	78.60%	1.12%	1.12%	-	1.12%	6.52%
21	Loans and advances	45.51%	1.14%	1.14%	-	1.14%	2.14%	-	-	-	-	-	-	-	30.68%	-	-	-	0.50%	-	-	-	0.62%	-	-	-	79.44%	1.14%	1.14%	-	1.14%	6.45%
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	<b>Households</b>	2.43%	2.43%	2.43%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.43%	2.43%	2.43%	-	-	24.41%
25	of which loans collateralised by residential immovable property	2.44%	2.44%	2.44%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.59%	0.59%	0.59%	-	-	24.32%
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.09%	
28	<b>Local governments financing</b>	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	6.84%
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	6.84%
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%	
32	<b>Total GAR assets</b>	3.60%	0.67%	0.67%	-	0.07%	1.66%	0.01%	-	-	-	-	-	-	1.98%	-	-	-	0.03%	-	-	-	0.04%	-	-	-	7.25%	0.67%	0.67%	-	0.07%	49.79%



4.10. GAR regarding flow (CapEx)

4. GAR regarding flow (CapEx)		Year End at 31.12.2024																									
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			Proportion of total new assets covered				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
%			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling						
<b>GAR_Covered assets in both numerator and denominator</b>																											
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	31.81%	5.40%	5.40%	4.26%	8.24%	-	-	-	-	-	-	8.96%	-	-	-	0.43%	-	-	-	49.44%	5.40%	5.40%	4.26%	17.43%		
2	<b>Financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.78%		
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.32%		
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%		
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%		
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.46%		
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.59%		
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%		
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.41%		
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance undertakings	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	0.11%	
17	Loans and advances	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	0.11%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	<b>Non-financial undertakings</b>	59.42%	8.27%	8.27%	8.27%	1.74%	-	-	-	-	-	-	17.38%	-	-	-	0.83%	-	-	-	-	79.38%	8.27%	8.27%	-	8.27%	13.30%
21	Loans and advances	59.31%	8.29%	8.29%	8.29%	1.75%	-	-	-	-	-	-	17.42%	-	-	-	0.84%	-	-	-	-	79.32%	8.29%	8.29%	-	8.29%	13.26%
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	0.04%
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	<b>Households</b>	4.31%	4.31%	4.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.31%	4.31%	4.31%	-	6.80%	
25	of which loans collateralised by residential immovable property	4.46%	4.46%	4.46%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.46%	4.46%	4.46%	-	6.57%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.23%	
28	<b>Local governments financing</b>	0.21%	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	1.90%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.21%	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	1.90%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%	
32	<b>Total GAR assets</b>	8.20%	1.39%	1.39%	-	1.10%	2.12%	-	-	-	-	-	2.31%	-	-	-	0.11%	-	-	-	-	12.74%	1.39%	1.39%	0%	1%	25.89%

Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)

4. GAR regarding flow

		Year End at 31.12.2023																								Proportion of total new assets covered															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)														
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)														
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)														
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds		Of which transitional	Of which enabling													
%(compared to flow of total eligible assets)																																									
<b>GAR - Covered assets in both numerator and denominator</b>																																									
1	Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	15.35%	9.77%	8.21%	-	1.56%	5.82%	-	-	-	-	-	-	-	8.51%	-	-	-	-	-	-	-	-	-	-	-	-	29.68%	9.77%	8.21%	-	1.56%	17.58%								
2	<b>Financial undertakings</b>	-	-	-	-	-	<b>0.55%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>3.71%</b>									
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.81%									
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.03%									
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.81%									
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
7	Other financial corporations	-	-	-	-	-	0.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.87%									
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.18%									
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.18%									
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
16	of which insurance undertakings	-	-	-	-	-	24.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.08%									
17	Loans and advances	-	-	-	-	-	24.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.08%									
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
20	<b>Non-financial undertakings</b>	<b>26.54%</b>	<b>5.81%</b>	-	-	<b>5.81%</b>	<b>0.13%</b>	-	-	-	-	-	-	-	<b>31.67%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>58.34%</b>	<b>5.81%</b>	-	-	<b>5.81%</b>	<b>4.72%</b>				
21	Loans and advances	26.54%	5.81%	-	-	5.81%	0.13%	-	-	-	-	-	-	-	31.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	58.34%	5.81%	-	-	5.81%	4.72%			
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-						
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-						
24	<b>Households</b>	<b>17.72%</b>	<b>17.72%</b>	<b>17.72%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>17.72%</b>	<b>17.72%</b>	<b>17.72%</b>	-	-	<b>8.14%</b>			
25	of which loans collateralised by residential immovable property	17.98%	17.98%	17.98%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.98%	17.98%	17.98%	-	-	8.03%		
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%				
28	<b>Local governments financing</b>	<b>0.13%</b>	-	-	-	-	<b>99.87%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>100.00%</b>	-	-	-	-	<b>1.00%</b>		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
30	Other local government financing	0.13%	-	-	-	-	99.87%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.00%			
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%				
32	<b>Total GAR assets</b>	<b>4.83%</b>	<b>3.07%</b>	<b>2.58%</b>	-	<b>0.49%</b>	<b>1.83%</b>	-	-	-	-	-	-	-	<b>2.68%</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<b>9.33%</b>	<b>3.07%</b>	<b>2.58%</b>	-	-	<b>0.49%</b>	<b>38.27%</b>







Template 1 Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
<b>Fossil gas related activities</b>		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Template 2 Taxonomy-aligned economic activities (denominator)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-

5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total applicable KPI	-	-	-	-	-	-

Template 3 Taxonomy-aligned economic activities (numerator)

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	-	-	-	-	-	-

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	22.8	100%	22.8	100%	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	22.8		22.8			

Template 5 Taxonomy non-eligible economic activities

Row	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
7	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-
8	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	-	-