

Banca Transilvania Financial Group

Communication with Investors Policy

General Information

This policy regarding Banca Transilvania's communication with investors sets the general framework for the communication between the Bank and capital market participants: investors, shareholders, bondholders, buy-side analysts, sell-side analysts, etc.

This policy takes into account the Romanian legislation, the European policies and the requirements of the Bucharest Stock Exchange. It also aims to implement the best practices in investor communication, in accordance with the requirements, methodologies and rigors of the Romanian capital market and of the various organizations in the field of Investor Relations.

The purpose of this policy is to ensure transparency and consistency in communications with entities that participate in the capital markets, to describe the principles governing the interactions with these entities and to detail the means of communication in order to protect the investors' interests and enhance their confidence in the company. It reflects the Bank's policy to communicate relevant information to capital market stakeholders and to be an example of best practice in this regard.

Banca Transilvania will not comment on TLV's share price evolution in the short term and will not comment on any speculative inquiry or market rumor.

BT is the first Romanian bank listed on the Bucharest Stock Exchange, with almost 30 years of know-how in the field of investor communication.

1 Legal and regulatory framework

- Law 24/2017 on issuers of financial instruments and market operations;
- EU Policy 596/2014 on market abuse;
- Bucharest Stock Exchange Code, including the Corporate Governance Code;
- Other policies issued by the Financial Supervisory Authority and the Bucharest Stock Exchange.

2 Scope

This policy applies to all persons who are part of Banca Transilvania's team and who communicate or contribute to BT's communication with capital market participants: members of the Board of Directors and of the Leaders Committee, other persons part of Banca Transilvania team, etc.

The Bank ensures the uniform distribution of information through all official communication channels, thus avoiding selective or preferential disclosure. To ensure consistency and compliance, all enquiries from the investment community, shareholders, analysts or any other stakeholders participating in the capital market should be sent to BT's Investor Relations team, Investor.Relations@btrl.ro.

3 Main principles in communicating with investors

3.1. Transparency

BT recognizes the importance of providing clear, accurate, complete and timely information so that investors can make well-informed decisions. Transparency is essential to maintain confidence in the company and the capital markets.

To ensure transparency, the bank shall take into account the following:

- **Periodicity:** by publishing quarterly, half-yearly and annual financial reports, according to the reporting calendar communicated to the BVB (calendar available [here](#)), as well as on the [BT Investor Relations website](#).
- **Relevance:** by publicly communicating all events and information that may influence the price of the securities issued, such as: changes in management structure, strategic decisions, acquisitions or mergers, significant litigation or other relevant situations.
- **Accessibility:** the financial information is available to the public on the BT website, BT's official page on the BVB website and through other official communication channels.

BT also facilitates access to questions, meetings and clarifications through the Investor Relations team. Shareholders, investors, analysts or other capital market stakeholders can contact the Investor Relations team at Investor.Relations@btrl.ro.

3.2. Equal treatment

The Bank provides equal access to information to all investors, regardless of their shareholding or any other criteria. This principle is essential to prevent discrimination and to protect the integrity of the capital market.

Practices that guarantee equal treatment include:

- **Simultaneous distribution of information:** Any official announcement is published simultaneously on the bank's dedicated page on the BVB website (available [here](#)), on the BT's website (available [here](#)), as well as on other official channels.
- **Accessibility in relevant languages:** In order to facilitate access to a wide audience, the bank publishes documents both in Romanian and English.
- **Direct and fair interactions:** Video conferences with investors to present the financial results are organized transparently, quarterly, according to the calendar published at the beginning of each year on the BT page on the BVB website and on the BT Investor Relations website; the information disseminated during these conferences is subsequently published on the [BT website](#).

The Bank prohibits any practices that might favor certain groups of investors over others, such as providing inside information to a specific investor.

3.3. Confidentiality of inside information

The protection of inside information is essential for compliance with the EU Policy 596/2014 on market abuse. Inside information is precise data that has not yet been made public, but which could significantly influence the price of the company's financial instruments if it became known.

Banca Transilvania undertakes not to disclose inside information (as defined by the above-mentioned policy) selectively. Such information will be communicated to all

interested parties simultaneously, in the form of communications or reports published on the BT's website, on the BVB platform and/or any other official channels, in order to ensure equal information to all interested parties.

In order to determine whether certain information can be considered as inside information or not, its analysis is carried out on a case-by-case basis with reference to the provisions of the EU Policy No. 596/2014 on Market Abuse, as well as other relevant Romanian and EU capital market policies, taking into account the situations listed as inside information in the relevant policies, the thresholds, as well as all the circumstances and the potential impact that such events could have on the price of BT's financial instruments.

4 Communication channels

In order to ensure an efficient dialogue with capital market participants and their easy and simultaneous access to information, the Bank provides information through the following official communication channels:

- **BVB official reporting platform:** dedicated page [TLV](#).
- **Company website, Investor Relations section:** for the publication of periodic reports and other relevant communication materials to capital market participants, such as: company's presentations, ratings, trading information, capitalization and dividend history, events calendar, list of financial analysts, current BT reports, contact details of the Investor Relations team and other information relevant to shareholders and investors). This information is available [here](#).
- **Quarterly financial results video conferences:** the bank's senior executive management (at least two participants from the CEO, CFO and CRO), as well as members of the Investor Relations and Communications & PR team, organize the quarterly video conferences for capital market participants, immediately after the publication of the financial results. The recordings of these videoconferences together with the supporting presentations and transcripts of the speeches, are made available on BT's website, [here](#).

Analysts and institutional investors attending the event have the opportunity to ask questions, while private investors can join the videoconferences call by accessing a link provided by the Investor Relations team (upon request).

- **General Meetings of Shareholders:** detailed and historical information for General Meetings of Shareholders' (notices, materials, resolutions, etc.) is available on BT's website, [here](#).
- **Information dedicated to bondholders:** BT publishes on its website, in this [section](#), all the information and documents required by bondholders, including issue prospectuses, final terms of each bond issue, agreements with paying agents, etc.
- **Publication of reports and communication of non-financial (ESG) information:** the page dedicated to the Banca Transilvania ESG section ([here](#)) comprises the information published by BT on sustainability, including both regular reports (e.g.: sustainability reports, ESG rating information, etc.) as well as other information or policies published regularly or ad-hoc.
- **Investor Day event:** organized annually, this is an occasion for the bank's management to present the bank's strategy and development plans and to put the business, operational and/or financial results in a broader context. Attendees have the opportunity to listen to presentations delivered by the management team, including members of the senior executive management who do not regularly attend the quarterly videoconferences, in order to facilitate the investors' access to a direct dialog with them and to respond to the needs for face-to-face interaction.

The event will be announced to all capital market participants by means of a notice published on the BVB website, on the page dedicated to the TLV issuer, in the "News" section, available [here](#). The event will be live streamed online and the recording of the event, the supporting presentations and its transcript are then published on the BT website, [here](#).

- **Investor roadshows, conferences and events:** BT regularly communicates and interacts with analysts and institutional investors through investor roadshows, events and conferences. The events that the Bank has attended and will attend

are available on the company's website, [here](#). These events can both be organized by BT but can also be facilitated by capital market intermediaries. The Bank will not deny access to these events to any analyst or institutional investor as a result of a negative recommendation by an analysts or a decision by an investors to stop holding TLV shares. Participation in these events is open to all type of capital market participant on a non-discriminatory basis,, upon request, and according to each party's interest of. These events are not organized during closed periods, and all interactions are always be conducted in accordance with the applicable policies, in particular those related to the selective disclosure, material non-public information and equal treatment.

The main objective of these interactions is to explain the strategy, the financial results and the business performance of the bank or of the Group companies, the trends observed at macroeconomic level and in the financial-banking market, the progress and sustainability performance and to answer any questions on these topics, based on the information already available to the general public.

Strategic issues and analysts' or investors' concerns are communicated to the executive management by the Investor Relations team, at the end of each event.

- **Contact and communication with the Investor Relations team:** investors, analysts or any capital market participant can contact Banca Transilvania's Investor Relations team by accessing the Contact section on [Investor Relations](#), available on the BT website. Questions and requests made by phone or e-mail are also dealt with in a timely manner. Individual meetings do not take place during closed periods.

Furthermore, these interactions will always be conducted in accordance with the applicable policies, in particular those on selective disclosure, material non-public information and equal treatment. As a general rule, at least one member of the Investor Relations team will be present in these interactions, and one or more members of executive management may also be present. Any explanations and discussions are based on information that is already public.

- **Press releases:** on the occasion of important information, including for the general public, the company issues press releases, which are published on the BT/Newsroom website, [here](#).
- **LinkedIn** ([here](#)) the most appropriate social media channel for BT to communicate with investors in order to promote information of public interest.

5 Types of information communicated

Effective and compliant communication involves the timely and accurate transmission of information that may influence the investors' decisions. Under this policy for communication with investors, BT classifies the information communicated to investors into several categories, according to its nature and relevance:

5.1. Regular financial reports

The bank publishes financial reports that offer a clear picture of its business performance and financial position:

- **Quarterly reports:** interim financial statements (consolidated and individual), unaudited, reviewed, together with a press release, summaries of key indicators and developments in BT's business, supporting presentations used in the quarterly videoconferences, ASF report, balance sheet and profit and loss account positions.
- **Half-yearly reports:** revised interim financial statements, together with a press release, summary of key indicators and developments in BT's activity, supporting presentations used during the quarterly videoconferences, ASF report, Excel file containing the balance sheet and profit and loss account positions.
- **Annual reports:** audited financial statements (consolidated and individual), auditors' report, Board of Directors' report, together with a press release, summary of key indicators and developments in BT's activity, supporting presentations used in the quarterly videoconferences, ASF report, Excel file containing balance sheet and profit and loss account positions, and other relevant information.

These reports are published in accordance with the financial calendar approved by the Board of Directors and previously communicated to the BVB, available [here](#), as well as on the BT's Investor Relations website. Annual reports are published within a maximum of 120 days from the end of the financial year, whereas the half-yearly and the quarterly reports are published within a maximum of 45 days from the end of the half-year/quarter for which the report is drafted.

5.2. Major events and corporate decisions

In accordance with its legal obligations, the bank reports any event or decision that may influence the price of the issued financial instruments:

- **Strategic events:** mergers, acquisitions, divestments, significant restructuring or other changes that may have an impact on BT's value.
- **Decisions of the General Meeting of Shareholders:** the voting results on the proposals, such as dividends distributions, capital increases or amendments to the articles of association.
- **Changes in management:** appointment or dismissal of Board of Directors or executive management members.
- **Disclosure of any legal disputes** that could have a financial or reputational impact on the bank.
- **Negative events (crises):** incidents such as: major operational disruptions, sanctions or other unforeseen situations that affect/may affect BT's business and image.

These disclosures are made through current reports, in accordance with the applicable policies and internal statutory policies, and are published both on [BT's website](#) and on the bank's official page on the BVB (available [here](#)).

5.3. Information on the shareholding structure

BT communicates any significant changes in the shareholding structure, as required by the Financial Supervisory Authority and the Bucharest Stock Exchange.

5.4. Communications on market operations

According to the Bucharest Stock Exchange Code, the bank will report:

- New issues of financial instruments;
- Results of the public offers to buy, subscribe or sell;
- Notices of transactions made by persons holding management positions in the organization or persons closely linked to them (under the EU Market Abuse Policy 596/2014).

5.5. Other relevant information

The Bank may also disclose other types of information relevant to investors, including:

- **Financial forecasts and outlooks:** communications on financial targets or forecasts, if they are substantiated and relevant.
- **ESG (environment, social, governance) reporting:** reporting progress on sustainability, social responsibility and sound corporate governance practices;
- **Innovation and partnerships:** products/services launches, digital solutions, strategic partnerships or alliances.

6 Investor Relations team responsibilities

The effective implementation of the Investor Communication Policy requires a clear definition of responsibilities within the bank. This structure ensures that all activities related to investor communication are coordinated and in line with the applicable policies and basic principles in investor relations communication. The ESG Integration & Investor Relations Division (DESGIR) is the main structure responsible for managing the communication with capital market stakeholders.

DESGIR responsibilities include:

- **Management of investor related information:** ensures the completeness of published information relevant to investors and capital market participants. It also develops recommendations on the content and relevance of the information relevant to investors.
- **Investor relations coordination:** takes requests and answers questions received from investors and analysts, organizes and participates in meetings with investors and analysts, organizes videoconferences dedicated to investors and analysts, facilitates open dialogue with capital market stakeholders.
- **Dissemination of analysts' reports and comments related to the Bank:** monitoring the liquidity of the capital markets; monitoring the database of active investors and analysts; informing the executive management team about the relevant information obtained from discussions with investors, analysts or rating agencies.

The role of the Board of Directors is to oversee the implementation of this policy on communication with investors and to approve the strategic information communicated to the public. The executive management, represented by the CEO, CFO, CRO and other members of the executive management team, is responsible for the implementation of this policy.

The executive management also provides support to DESGIR in the fulfillment of its duties and verifies the implementation of the Policy on communication with investors as well as the compliance with the reporting deadlines.

In addition to DESGIR, other departments contribute to the implementation of the communication policy, including:

- **Financial Data Processing and Reporting Department, Controlling and Planning Division:** by drafting and preparing the financial data, ensuring its correctness and accuracy, and drawing-up the financial reports.
- **Sustainable Corporate Governance and International Financial Markets Division:** by verifying the compliance of disclosures with the legal policies and providing advice in areas of specific competence. It also regularly verifies the legal and regulatory requirements in order to ensure the documents' and

communication processes' compliance.

- **Marketing, Communication & PR Division:** by coordinating the public messages, issuing press releases and other official communication materials, managing the BT Investor Relations platform, contributing to the organization of investors and analysts events together with DESGIR, managing mass-media relations.

7 Closed periods

The Bank has established a period of at least two weeks prior to the publication of financial results as a closed period, i.e. the period of time during which the Bank does not provide information to or interact with capital market participants (participation in investor events or one-on-one meetings, in order to prevent the interpretation of disclosed information on the financial results for the period that is to be reported).

8 Confidentiality and preventing market abuse

The Bank applies strict measures to prevent unauthorized use of inside information in accordance with the provisions of the EU Policy 596/2014 and of other relevant policies.

The types of information disclosed reflect the company's policy to comply with the laws in place and to meet the investors' requirements for transparency, relevance and accessibility of data. Each category of information is treated seriously, and internal procedures are aligned to ensure compliance and quality of disclosure.

9 Review and update of the policy

This policy will be reviewed periodically, whenever deemed necessary, to ensure its compliance with the legal changes and best practice.

For further information or questions, please contact Banca Transilvania
ESG Integration & Investor Relations Division, Investor.Relations@btrl.ro.

Disclaimer:

We undertake to fully respect and comply with the provisions of this commitment, which we undertake to periodically update. This statement is the minimum level of commitment that we will continue to comply with in accordance with the applicable legal provisions (where needed).

