

Banca Transilvania Financial Group

Business Ethics

Commitment

Ethical responsibility

BT sees ethical responsibility as intertwined with business responsibility. The ethical rules BT sets within the company add value for all the stakeholders.

We believe that business ethics are essential to maintaining a fair and sustainable competitive environment. Therefore, to remain a valuable partner, the principles on which we build our business are very important to us: Integrity, Loyalty, Honesty, Fairness, Responsibility, Compassion, Leadership.

As the largest bank in Romania, we are aware of the important contribution we can make to shaping the future of the Romanian financial system and economy. As we continue to evolve, our commitment to responsible growth remains strong and our annual reports are further proof that, step by step, we are making progress towards a more sustainable economy.

We have a moral and strategic obligation at the level of the financial sector in Romania to promote and generate positive change, together with our customers, suppliers, colleagues and all our stakeholders.

Guided by strong values such as respect, courage, responsibility, openness, and honesty in our relationships with all of our partners, our mission is to support businesses and communities anywhere and anytime, online and through our territory network, giving our customers positive experiences and helping them turn their dreams into reality.

We integrate ethical considerations into our decision-making process by establishing ethical guidelines, implementing the [Code of Conduct](#), and compliance frameworks such as: the Policy on Compliance with Competition Regulations, the [Anti-Bribery and Corruption Policy](#).

The role of the Code of Ethics and Conduct of BT Financial Group is to communicate to all stakeholders (shareholders, managers, employees, customers,

partners, other parties) its values and principles to which employees and members of the body management of companies within the BT Group have adhered. At the same time, the Code represents a conduct guide in the daily activity or in special situations, dedicated to the employees of BT Financial Group and the members of the Management Board of the companies within the group with the purpose to present a comprehensive set of rules or guidelines of misconduct, but not to provide solutions to different situations. The Code provides guidelines and minimum standards, functioning as work ethics basis for the employees of the BT Financial Group. The Code complies with the high quality ethical and professional standards promoted in the bank. The Code of Ethics and Conduct establishes that all companies of BT Group do not tolerate any form of bribery and /or corruption. No employee/member of the governing body of any company within the Banca Transilvania Financial Group will accept or grant any inappropriate advantage of any kind (incentives), regardless of whether the person providing or requesting such an advantage works in the public sector or private sector. It is also forbidden to offer or receive any form of bribe, or to practice traffic of influence, either directly or through intermediaries.

As a representative pillar of the Romanian banking system, fair competition and conduct characterized by honesty, integrity, and transparency are essential elements integrated into the Code of Ethics and Conduct of the Group. The policy on compliance with competition regulations expresses the Group's firm position in terms of compliance with the legal provisions of competition law. The Group regards fair competition as an essential part of its organizational culture and competition compliance is a priority for its business. The policy sets out the principles to be upheld by all BT Group employees and associates to ensure high standards of professional conduct and integrity in the business conducted within or on behalf of the Group. It also addresses anti-competitive practices and the sanctioning of BT employees for breaches of competition rules or the undertaking of anti-competitive practices. This policy is communicated to all employees. Our employees must be familiar with and comply with the provisions of the Competition Policy and abide by all the principles set out therein. They are encouraged to report any potential competition violations to the Senior Executive Manager of Corporate

Governance and Litigation Division. The company can sanction employees both for their violations and for non-reporting of violations by other employees.

At the BT Group level, the Anti-Bribery and Corruption Policy defines the internal regulatory framework for how the Group acts to combat bribery and corruption. The policy describes the internal procedures that apply in this regard, including reporting channels and how whistleblowing is done.

We also integrate ethical considerations by offering Socially Responsible Investing products that screen out companies involved in controversial industries such as tobacco, weapons, or environmental harm, by promoting environmentally friendly practices such as reducing paper usage, promoting energy efficiency, and investing in renewable energy projects. This helps minimizing our impact on the environment and support sustainable development. Please go to our [Sustainability Report 2023](#), and [PRB Report 2022](#), both representing BT's commitments in terms of sustainable practices.

In terms of ethical dilemmas, we are constantly advising clients on investment opportunities, with their best interest as our top priority. Fair Lending Practices are in our DNA, thus we are expected to provide fair and equal access to financial products and services. In line with this requirement, we have established a [Sustainable Finance Framework](#), providing access to lending to broad category of social category.

Disclaimer:

We undertake to fully respect and comply with the provisions of this commitment, which we will 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).

