

Banca Transilvania Financial Group

**Related Party  
Transactions  
Commitment**

Transparency and disclosure are the two cornerstones of the Bank's efforts to ensure that all transactions are conducted at arm's length and in the best interests of our stakeholders.

Related party transactions can create conflicts of interest and raise concerns about the fairness and potential for abuse, which is why BT closely monitors all related party transactions and strictly regulates such transactions through its Code of Conduct.

To achieve the above, the Bank requires its directors to comply with the below provisions.

- It is forbidden to pursue any personal financial interest that is contrary to, or likely to prejudice or affect the interests and results of the Bank, and to act solely in the interests of the Bank, its shareholders, and customers.
- It is forbidden to pursue a personal interest in the outcome of the service provided to the client or of a transaction carried out on behalf of the client that is different from the interest of the client in that outcome.
- The directors should not lend money from the Bank's own resources to clients, either directly or through intermediaries, or to solicit or accept loans from the Bank's clients and provide services other than those of the Bank, the Group or its partners.
- It is strictly forbidden to seek benefits or advantages arising from the position of Director, and use information obtained in the position of Director of the Bank for personal benefit or that of a third party, directly or indirectly, and to strictly observe the rules on confidentiality of transactions.
- To refrain from participating in financial or commercial transactions with a view to gaining, directly or indirectly, a personal advantage based on information obtained in his/her capacity as a Director of the Bank.
- Never use the property of the Bank (for example logos) for personal purposes and never use the name of the Bank for personal business.
- Strictly comply with the limits of the mandate given by the Bank for the performance of the duties.

- Not to accept/offer remuneration, gifts, rewards or benefits of any kind from/to customers, employees, suppliers, to facilitate the obtaining/offering of services or advantages.
- Not to offer or guarantee loans, not to enter into business transactions on behalf of the Bank or Group companies, with any entity, BT customer, supplier or consultant to it - if he/she or a member of his family (spouse, relatives or relatives up to the second degree) is a shareholder/partner or holds a management/executive position in that entity (regardless of its object of activity).
- Not to carry out transactions with or on behalf of customers without their prior consent, or to carry out transactions with the Bank's funds outside the regulated flows.
- It is forbidden for members of the BT Board of Directors to participate in the process of promotion/analysis/negotiation/approval of loans, operations or transactions in which they have/could have a personal interest, directly or indirectly, or from which they derive/could derive a personal benefit for themselves or for their life partner, relatives and relatives up to the second degree, spiritual relatives (godparents, godchildren) or other related parties.
- Any transaction by the Company with any company with which it has a close relationship, the value of which is equal to or greater than 5% of the net assets of the Company, is approved by the Board of Directors, following a binding opinion from the Audit Committee.

Related party transactions at BT Financial Group level are subject to an internal policy approved by the Board of Directors and are disclosed in accordance with the applicable legal requirements.

**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).

