



Banca oamenilor
întreprinzători

Sustainability Report

2023

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Ömer Tetik
CEO, Banca Transilvania

Welcome message

Dear shareholders, customers,
partners and BT team members,

We are one of the key players in the financial system in Southeastern Europe, serving more than four million customers through our business and services. This is particularly true in promoting and supporting the transition to a more sustainable economy. What we do, individually and collectively, will determine the direction and pace of this change.

In today's environment of heightened focus on sustainability issues by all stakeholders, there are new legislative and regulatory requirements, new reporting and disclosure obligations that will have an impact on both the financial and banking sector and our customers. To prepare for what lies ahead, we have stepped up our sustainability efforts to help build a better future. We are ready for the new sustainability reporting regulations and are confident that, together with our clients and partners, we will be able to meet the increasingly demanding requirements.

We are focusing on promoting green finance, which is essential for building an economy capable of meeting the environmental challenges of the coming decades. In 2023, the amount of green loans to companies exceeded the RON 1 billion threshold, as part of our multi-year target to provide RON 3.5 billion of green finance between 2023 and 2025, whether for renewable energy, green mobility, water efficiency or energy efficiency projects.

Together with our global partners, including the EBRD, the EIB and the EIF, and the IFC, we are working closely to develop products and services to support the transition of Romania's economy, and through our membership of UNEP-FI and the Principles for Responsible Banking, we are taking an even broader view of the environmental and social impact of our operations.

In 2023, we issued our first sustainable bond as part of our commitment to responsible finance, encouraged by our current impact on the economy by supporting SMEs. We believe that supporting access to finance and mobilizing capital for sustainable projects creates long-term value in Romania.

At the same time, in 2023 we completed the inventory of emissions generated, as we committed to do at the beginning of this journey. We can say that we now have full visibility both on the environmental impact of our own activities - where we have been able to extend the carbon footprint calculation to all relevant categories of our activities, including the purchase of goods and services - and of the impact generated by the allocation of capital through financing and investments, by calculating the financed emissions for the second consecutive year. This ongoing assessment gives us greater clarity in setting priorities and enables us to make more informed decisions.

2025 will be a defining moment for transparency and accountability in sustainability reporting. We are therefore focusing our efforts on accurate data collection and ongoing monitoring, recognising that part of our reporting depends on the transparency of our customers.

We have integrated sustainability topics into our communications with customers, seeking to identify the challenges they face in these areas and, where we have expertise, to provide relevant solutions and support. We believe that by supporting and developing such dialogue initiatives, more and more customers will become aware of the benefits and importance of transparency as a prerequisite for change.

As a universal bank in one of the most underbanked economies, we have an obligation and an opportunity to increase access to banking products and services, both through our more than 500 branches and through our apps. Access to financial services is essential to stimulate economic growth and build a more equitable society. Together with our suppliers, colleagues and all our other stakeholders, we can make a positive difference. We are determined that, together with the teams in all the companies of Banca Transilvania Financial Group, through hard work, solid commitment, synergies and cooperation, we will contribute to closing of gaps from the rest of Europe.

Finally, our commitment to the highest standards of corporate governance is reflected in every decision we make and every action we take to serve the interests of our stakeholders. At the same time, we recognise the importance of fostering a diverse and inclusive environment, both within our organisation and in our interactions with our customers and employees. Last year, BT Group joined the Diversity Charter, becoming the largest signatory in the financial banking sector in Romania.

Confident in our strong track record we look forward to what lies ahead. Only by working together we can build a better future for all.

About the report

This is the fourth sustainability report of Banca Transilvania Financial Group (*referred to throughout the report as - the Group, BT Group, BT Financial Group or BTFG*) and covers the activity carried out between 1st of January 2023 and 31st of December 2023. The report is published annually in the first semester of the year. The content of the report provides information on the activity of Banca Transilvania and its representative subsidiaries in Romania and the Republic of Moldova: BT Microfinanțare (BT Mic), BT Leasing, BT Pensii, BT Asset Management, BT Capital Partners, BT Direct, Improvement Credit Collection, Salt Bank, Idea::Leasing, respectively Victoriabank and BT Leasing Moldova.

Information referring to Romania or the Republic of Moldova describes the activity of the entities in that country. If no reference is made to a specific entity, the information disclosed applies to all entities of Banca Transilvania Financial Group.

The report is prepared in accordance with the Global Reporting Initiative 2021 (GRI) Standards, while complying with the provisions of the [Ministry of Public Finance Order 3456/2018](#) and the [National Bank of Romania Order 7/2016](#) and the information required by EU Regulation 852/2020 (EU Taxonomy). Thus, to identify the non-financial indicators presented in this report, a materiality analysis was performed between November 2023 and January 2024, which identified the material topics. The analysis was carried out according to the guidelines of GRI Standard 3.

The Sustainability Report of the Banca Transilvania Financial Group has been subject to an independent limited assurance audit for the selected profile indicators and material performance indicators, and selected material performance indicators, marked "☑" in the GRI table. The assurance service was provided by Deloitte Audit SRL.

To facilitate the presentation of numerical information, some of the numerical indicators presented in the report have been rounded or converted from one unit of measure to another/ from MDL to RON. Therefore, in some cases, there may be minor differences between the values presented and the absolute figures.

Exchange rate used: 1MDL = 0.2570 RON

Editorial team

This report was developed under the coordination of the ESG Integration&Investor Relations Department and is the result of the work of the entire BT Group team. Throughout the report we have benefited from support and advice from The CSR Agency team.

Suggestions and recommendations

Please send your suggestions, opinions, recommendations, or questions to:

ESGreporting@btrl.ro

website:

bancatransilvania.ro

Interactive content:

bancatransilvania.ro = external link



Contents button = link to Contents page of the report




For a better view of the report's content and access to all interactive elements, we recommend downloading it and opening it with a .pdf document reader (e.g., Adobe Acrobat Reader DC).

The information regarding the number of projects and partners for community investments, the number of employees, and the green asset ratio (GAR) presented in this Sustainability Report present minor discrepancies as compared with those depicted in the non-financial declaration published as annex in the Board of Directors Report as a result of the final revision process. In particular, the variation in GAR indicators is attributed to the different methodologies used for computation, with the Board of Directors Report relying on Pillar 3 Annex II - Instructions for ESG prudential disclosures templates, while this report presents the Group's green asset ratio as per the Delegated Act supplementing Article 8 of the Taxonomy Regulation (Disclosures Delegated Act 2021/2178 - DDA)






Headquarters
of the entities
included in
this report:




BT

-  Banca Transilvania S.A.
-  30-36 Calea Dorobantilor, Cluj Napoca, Romania
-  bancatransilvania.ro




BT Pensii

-  BT Pensii S.A.
-  75-77 Buzesti Street, 5th floor, 1st district, Bucharest, Romania
-  btpensii.ro

BT Direct

-  BT Direct IFN S.A.
-  74-76 Constantin Brancusi Street, 3rd floor, Cluj-Napoca, Romania
-  btdirect.ro




Idea::Leasing

-  Idea Leasing IFN S.A.
-  19-21 Bucuresti-Ploiesti Road, 2nd floor, 1st district, Bucharest, Romania
-  idealeasing.ro




BT Mic

-  BT Microfinanțare IFN S.A.
-  43 Bucharest-Ploiesti Road, Office E3-18, 3rd floor, 1st district, Bucharest, Romania
-  btmic.ro




BT Asset Management

-  BT Asset Management SAI. S.A.
-  22 Emil Racovita Street, Cluj- Napoca, Romania
-  btassetmanagement.ro




ICC

-  Improvement Credit Collection S.R.L.
-  74-76 Constantin Brâncuși Street, 2nd floor, Cluj-Napoca, Romania
-  iccollect.ro




BT Leasing

-  BT Leasing Transilvania IFN S.A.
-  74-76 Constantin Brancusi Street, 1st floor, Cluj-Napoca, Romania
-  btleasing.ro




BT Capital Partners

-  BT Capital Partners S.A.
-  74-76 Constantin Brancusi Street, ground floor, Cluj-Napoca, Romania
-  btcapitalpartners.ro




Salt Bank

-  Salt Bank S.A.
-  5-7 Dimitrie Pompei Blvd, 6th floor, 2nd district, Bucharest, Romania
-  salt.bank

Victoriabank

-  Victoriabank S.A.
-  141 31 August 1989 Street, Chisinau, Republic of Moldova
-  victoriabank.md

BT Leasing MD

-  BT Leasing MD S.R.L.
-  60/2 A. Puskin Street, Chisinau, Republic of Moldova
-  btleasing.md

1

Introduction

- 1.1 About Banca Transilvania Financial Group
- 1.2 Company profile and history
- 1.3 Organisational structure

1.1 About the Banca Transilvania Financial Group

As we rapidly approach 2030, it is clear that the European financial landscape will be profoundly transformed by the principles of the sustainable finance concept, which will gradually become an intrinsic part of its structure. This transformation is underpinned by a number of regulatory and policy frameworks, including the EU Taxonomy (Regulation 852/2020) and the Sustainable Finance Disclosure Regulation, the Corporate Sustainability Reporting Directive, which include or support the gradual integration of environmental, social, and governance (ESG) criteria into the core business of financial institutions. The ambitious European Green Deal, which aims to make Europe the first carbon-neutral continent, albeit a distant goal, has driven an unprecedented flow of capital into green investment, renewable energy, and sustainable infrastructure in recent years.

As a result, the ecosystem of financial products and services benefits from an influx of innovation and the development of new solutions such as sustainability bonds, all supported by advances in digitalization and technology that promise transparency and efficiency.

Stakeholder pressure is accelerating, reflecting a high societal demand for transparency and accountability in how financial institutions generate negative impacts on the environment and communities. In pursuing its ambitious goals, Europe is not only reshaping its financial system but also setting a global standard, promoting international cooperation, and harmonizing sustainability regulation.

Setting financial priorities and implementing policies are essential components, especially considering the looming challenges of climate change and biodiversity loss, which could lead to irreversible crises if collective and decisive action is not taken.

In this rapidly changing landscape, we recognize that our role as Romania's largest bank and financial group is fundamental in shaping the future of sustainable finance nationally and contributing to Europe's sustainability goals.


Guided by strong values such as respect, courage, responsibility, openness, and honesty in our relationship with all our partners, our mission remains to support businesses and communities anywhere and anytime, online and through our local network, providing our customers with positive experiences and helping them realize their dreams.

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

Acquisitions, integrations, and mergers in 2023

In 2023, Idea::Bank, wholly owned by BT, became **Salt Bank**. Salt Bank represents the perfect fusion of cutting-edge technology and human empathy, providing 100% digital banking, complemented by a fully staffed Care Center. At the same time, after several months of negotiations in 2023, we reached an agreement with OTP Group to acquire OTP Bank and its subsidiaries in Romania. The agreement was signed in February 2024.

In the Republic of Moldova, Victoriabank acquired all the shares of BCR Romania in BCR Chisinau. The acquisition took place at the beginning of 2024.

 For more details on acquisitions, mergers and integrations within BTFG see the [Board of Directors' Report 2023](#), page 39.

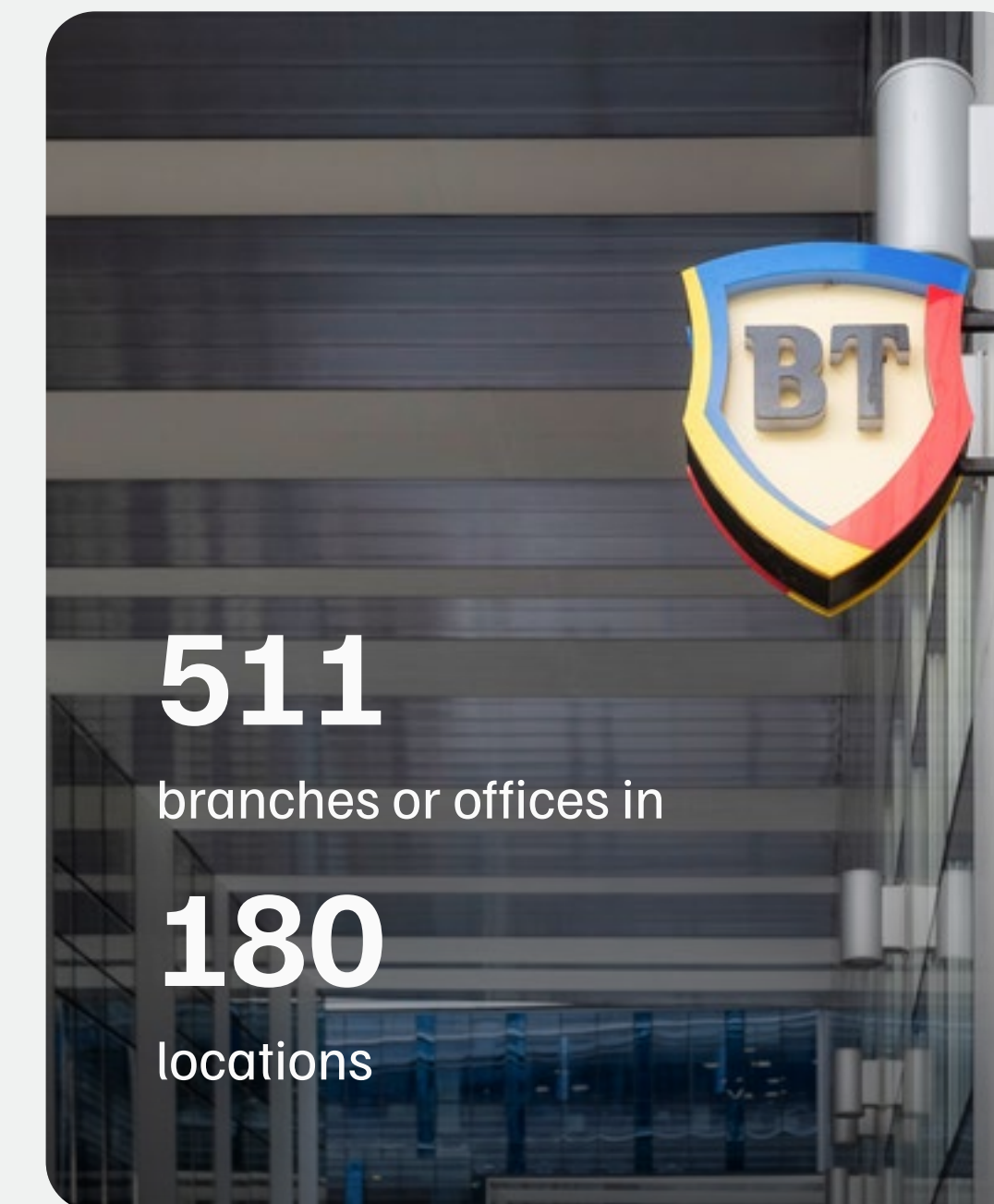
Subsidiaries of BT Financial Group in which the bank holds direct and indirect participations:

BTFG Subsidiaries	Business area	2023	2022
Victoriabank S.A.	licensed financial and investment banking activities	44.63%	44.63%
BT Capital Partners S.A.	investments	99.59%	99.59%
BT Leasing Transilvania IFN S.A.	leasing	100.00%	100.00%
BT Investments S.R.L.	investments	100.00%	100.00%
BT Direct IFN S.A.	consumer credits	100.00%	100.00%
BT Building S.R.L.	investments	100.00%	100.00%
BT Asset Management SAI. S.A.	asset management	100.00%	100.00%
BT Solution Asistent in Brokeraj S.R.L.	auxiliary insurance and pension funding activities	100.00%	99.95%
BT Asiom Agent de Asigurare S.R.L.	auxiliary insurance and pension funding activities	100.00%	99.95%
BT Safe Agent de Asigurare S.R.L.	auxiliary insurance and pension funding activities	100.00%	99.99%
BT Intermedieri Agent de Asigurare S.R.L.	auxiliary insurance and pension funding activities	100.00%	99.99%
BT Leasing MD S.R.L.	leasing	100.00%	100.00%

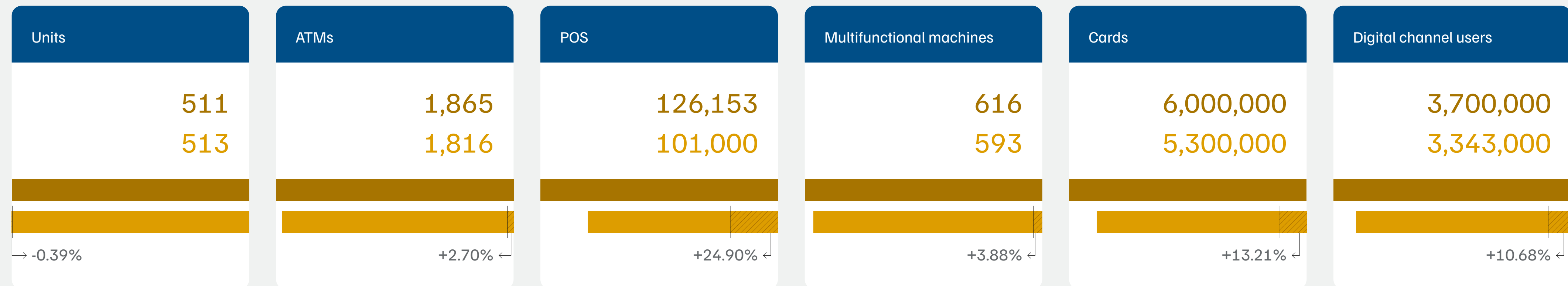
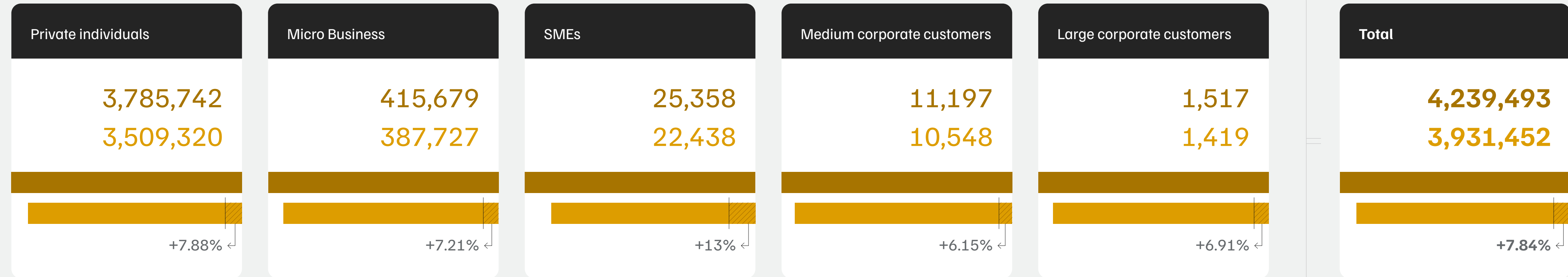
BTFG Subsidiaries	Business area	2023	2022
BT Microfinanțare IFN S.A.	other credit activities	100.00%	100.00%
Improvement Credit Collection S.R.L.	collection agencies and credit reporting bureau activities	100.00%	100.00%
VB Investment Holding B.V.	holding activities	61.82%	61.82%
BT Pensii S.A.	pension fund management (except those in the public system)	100.00%	100.00%
Salt Bank S.A.	other monetary intermediation activities	100.00%	100.00%
Idea Leasing IFN S.A.	financial leasing	100.00%	100.00%
Idea Broker de Asigurări S.R.L.	insurance agents' and brokers' activities	100.00%	100.00%
Code Crafters by BT	custom software development activities	100.00%	100.00%
Tiriac Leasing IFN S.A.	financial leasing	-	100.00%
BTP One S.R.L.	letting and subletting of own or leased real estate	100.00%	-
BTP Retail S.R.L.	letting and subletting of own or leased real estate	100.00%	-

1.2 Company profile and history

Banca Transilvania (BT) was established on December 16, 1993, and has been operating as a banking institution since 1994. As of December 31, 2018, BT is the largest bank in Romania and South-eastern Europe. As a universal bank, it covers all customer segments and business lines in the financial sector. The number of active customers by business lines, for which Banca Transilvania is the main bank, increased by 7.84% in 2023 compared to 2022.



**Active customers
Banca Transilvania**



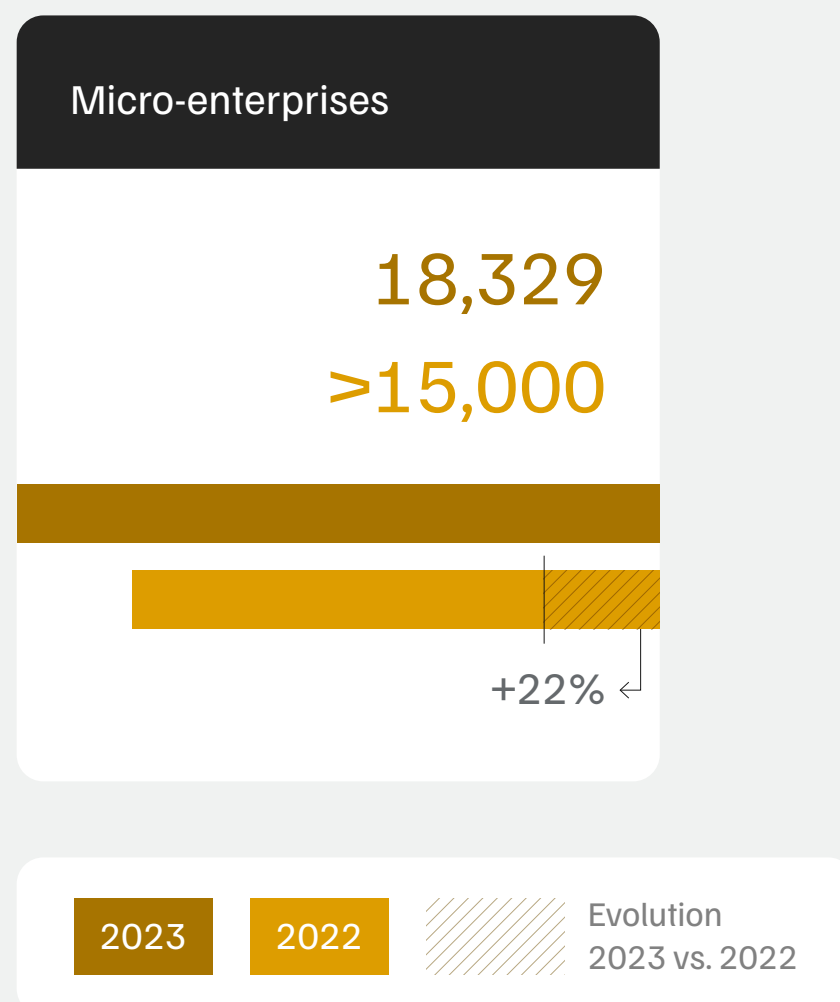
Note: The classification of legal entities within the segments is regulated by the internal rules that establish the conditions for classifying customers by business segments.

BT Microfinanțare (BT Mic) is a non-bank financial institution, established in 2016 to finance small businesses, including start-ups, complementing Banca Transilvania's role in supporting Romanian entrepreneurs. It targets entrepreneurs with a turnover of up to RON 1 million, regardless of their activity and organizational form : commercial companies, licensed private individuals, family businesses/associations, sole proprietorships, self-employed individuals, and individuals engaged in economic activities BT Mic's

approach to its clients is individual and personalized, with the aim of understanding each company and agreeing on a financing structure that will ensure its sustainable development.

Together with Banca Transilvania, BT Mic plays a significant role in developing the entrepreneurial ecosystem in Romania, with its latest initiative STUP, a physical and virtual space dedicated to supporting the entrepreneurial community. BT Mic and BT have created the infrastructure to connect entrepreneurs with service and product providers to start, run, and manage a business. The initiative includes events for entrepreneurs and aspiring entrepreneurs to improve entrepreneurship education and access to finance in Romania.

BT Mic
active customers



Ești și sef, și agent de vânzări, și contabil la mica ta afacere?
Hai să #creștiMAREcuBTmic!

BT **BT Mic**
Finanțăm afacerile mici

Ești și manager, și contabil, și șef la postări la mica ta afacere?
Hai să #creștiMAREcuBTmic!

BT **BT Mic**
Finanțăm afacerile mici

BT Mic

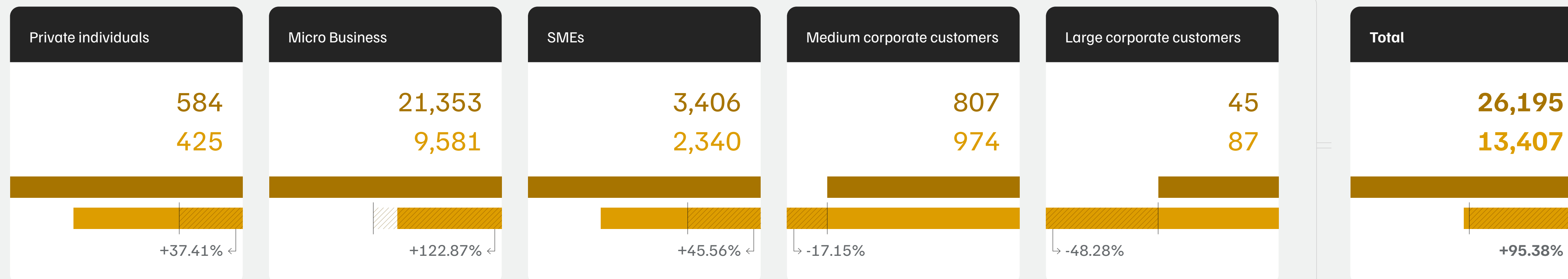
O FINANȚARE CA O CĂRTE BUNĂ
#creștiMAREcuBTmic

Daniel Glodeanu
Equivolenza
a găsit furnizor de servicii medicale la
stup

BT Leasing Transilvania IFN S.A. (BTL) provides lease financing for a wide range of vehicles, production, and other equipment and real estate. The merger of BT Leasing and Tiriac Leasing took effect on 1 January 2023, consolidating the leasing business within the BT Group.



BT Leasing active customers

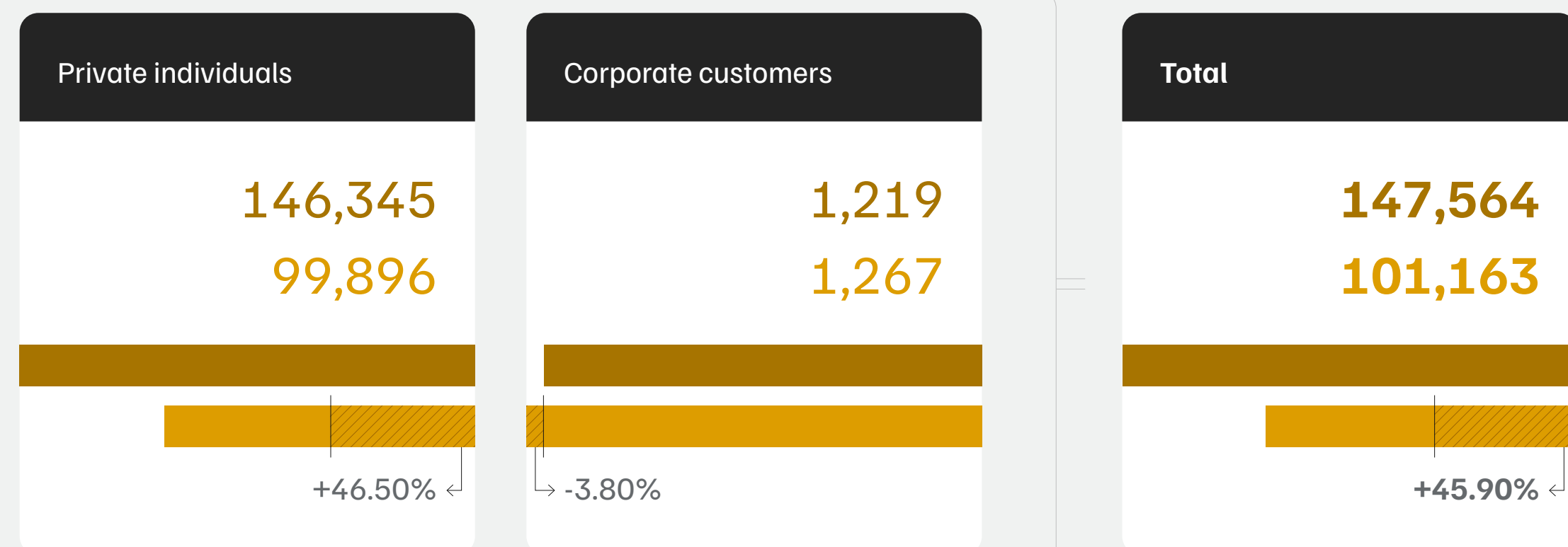


2023 2022 Evolution 2023 vs. 2022

BT Asset Management S.A.I. (BTAM) is an investment management company, a member of the Banca Transilvania Financial Group. It manages mutual funds and alternative investment funds, with placements in a wide range of financial instruments (equities, bonds, government securities, deposits, etc.). Clients have access to the capital market through investments in Romania, Europe, and the USA, in RON, EUR, USD, and GBP.

As of December 31, 2023, BT Asset Management is Romania's third-largest asset manager, with net assets under management of over 4.524 billion lei and a market share of 19.7%.

BT Asset Management active customers

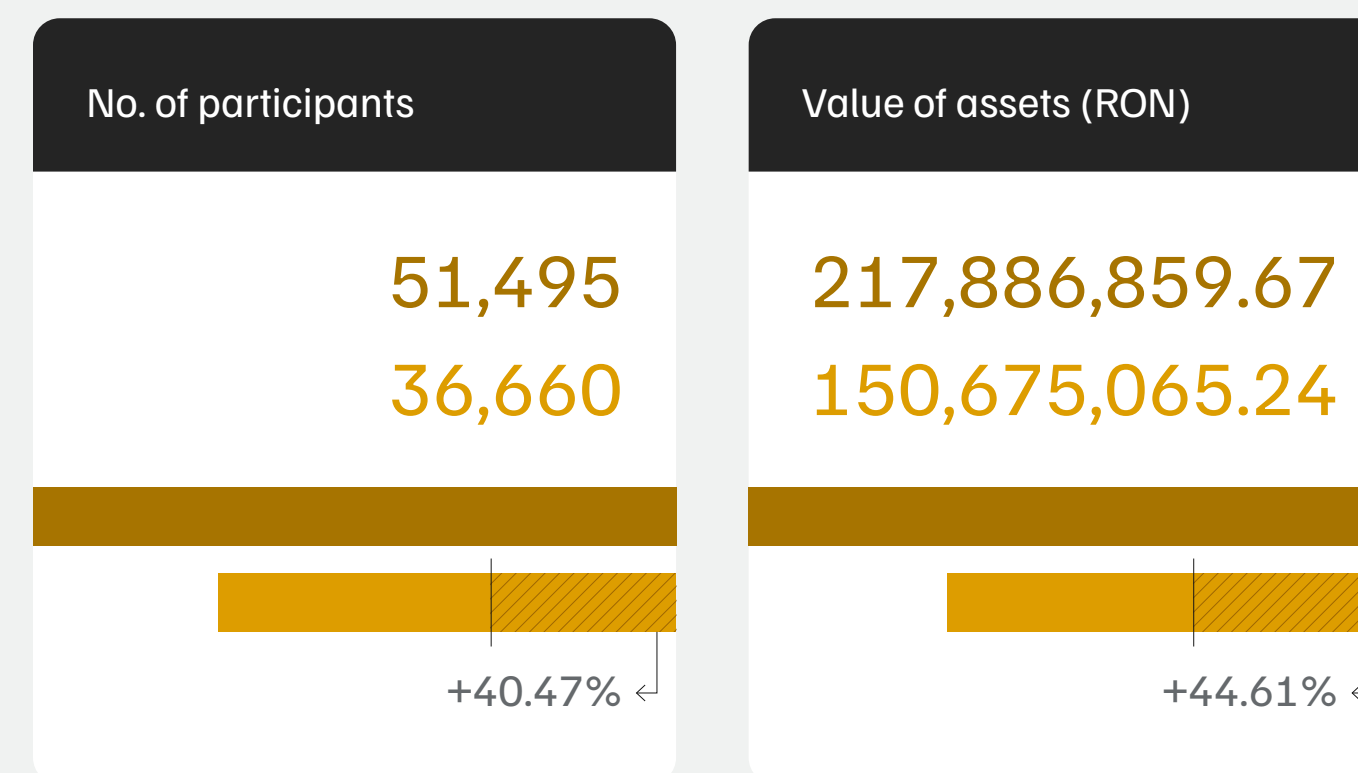


2023 2022 Evolution 2023 vs. 2022

BT Pensii Societate de Administrare a Fondurilor de Pensii Facultative SA (BTP) is the management company of voluntary pension funds within Banca Transilvania Financial Group, managing the Pensia Mea voluntary pension fund.

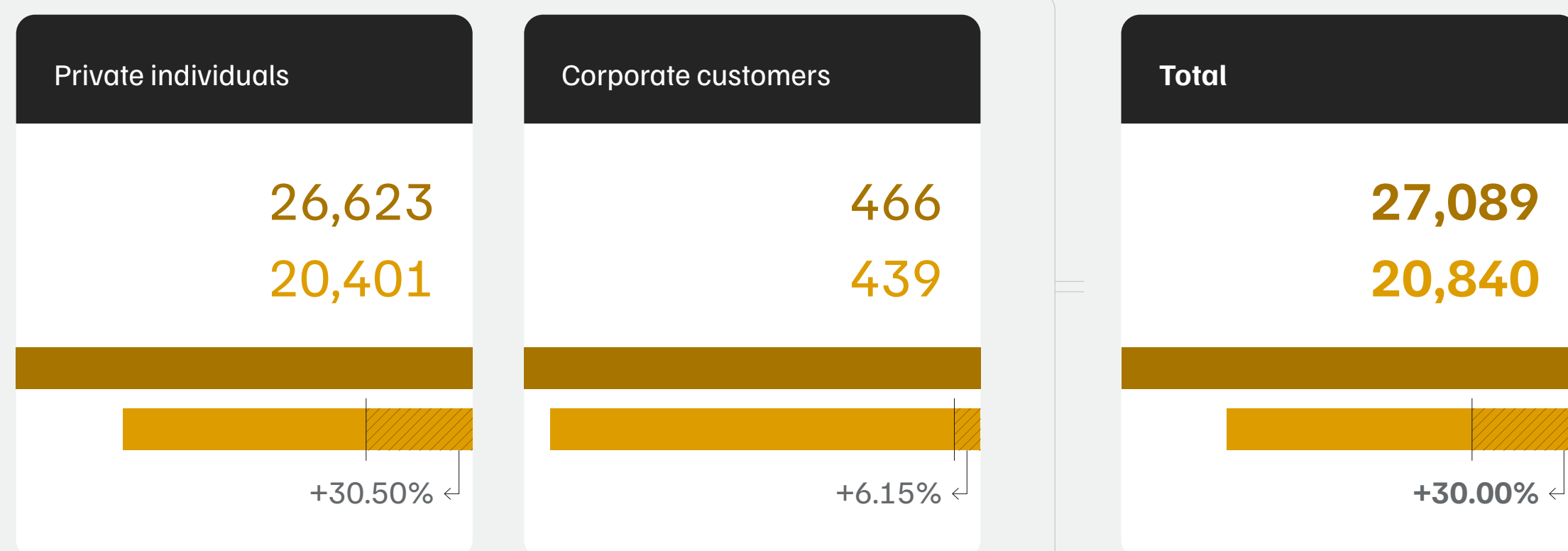


BT Pensii



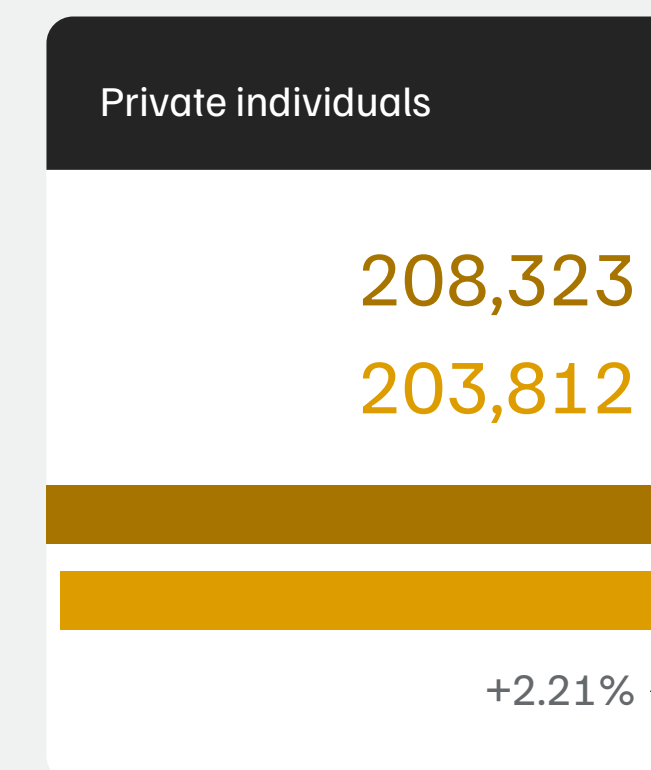
BT Capital Partners (BTCP) provides brokerage services, assistance in raising capital and attracting investors, merger and acquisition advice, sourcing and structuring complex financing, market research and strategic advice.

BT Capital Partners active customers



BT Direct IFN SA (BTD) is a non-banking financial institution, a member of the BT Group that provides a wide range of financial products both in-store lending and online lending, as well as personal loans, aiming to become the preferred institution of Romanians through quality services, modern solutions, and convenient financing options provided to customers by developing sustainable partnerships.

BT Direct active customers*



* active customers with operations in the last 6 months



Improvement Credit Collection SRL (ICC) is a Romanian company founded in July 2013, part of the BT Group, providing non-performing portfolio management, due diligence, and debt collection services, through both extra-judicial and judicial procedures.

At the end of 2023, ICC provided such services for its portfolio and for 9 other institutions and companies, and according to the official reports of the Ministry of Finance, on the Romanian market, ICC ranks 1st by profit, 5th by turnover, and 1st by operational efficiency (cost/income ratio).



Salt Bank S.A. is active in the financial banking sector (other monetary intermediation activities). Since December 2022, the bank stopped selling products to customer. The bank is currently focusing on the launch of a fully digital application and it is in the process of downsizing the portfolio generated before the migration of customers to Banca Transilvania in June 2022.

Salt Bank active customers

Private individuals	15,888
Micro Business	7,024
SMEs	8,984
Medium corporate customers	1,577
Large corporate customers	130
Total	33,603



In 2023, Idea::Leasing reduced its operations, as its activities will be integrated into BT Leasing in 2024 as part of the process of consolidating leasing activities at Group level. As a result, the company had limited activity during the reporting period and certain non-financial indicators were below the materiality threshold for reporting purposes. However, information on human resources indicators has been included for the reporting year.

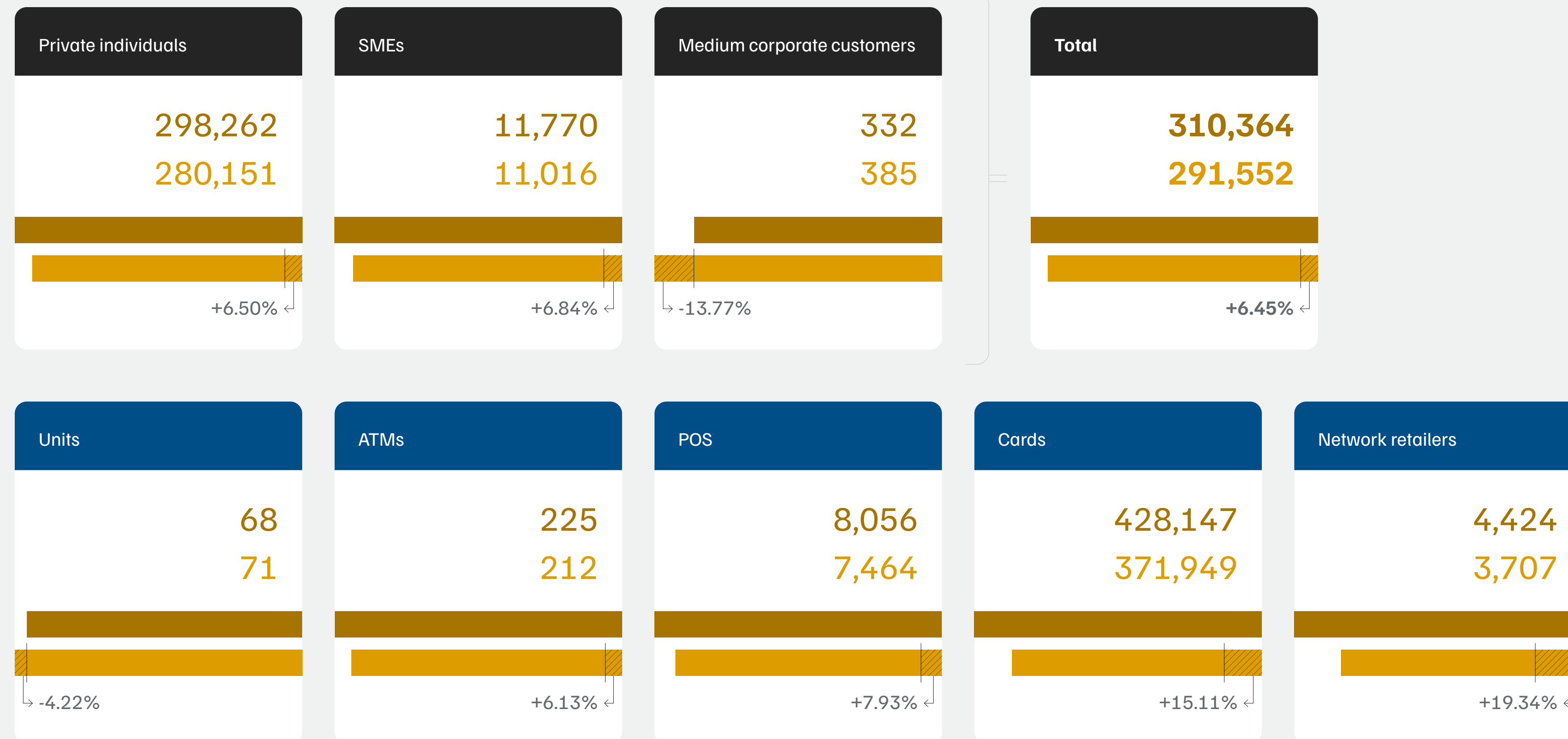




Victoriabank active customers

Victoriabank is a Moldovan brand, an innovator with the first-ever card, ATM, mobile app, and loans for small entrepreneurs in Moldova. In 2018, Banca Transilvania became the majority shareholder of Victoriabank, alongside the EBRD.

Victoriabank's priorities are to support Moldova's business environment, particularly the SME and micro-enterprise sector, and develop a wider range of products and services for retail customers while improving relevant corporate governance standards in line with the BT Group. Victoriabank continues to implement digital capabilities for the benefit of its customers investing in digital platforms, products, and services.



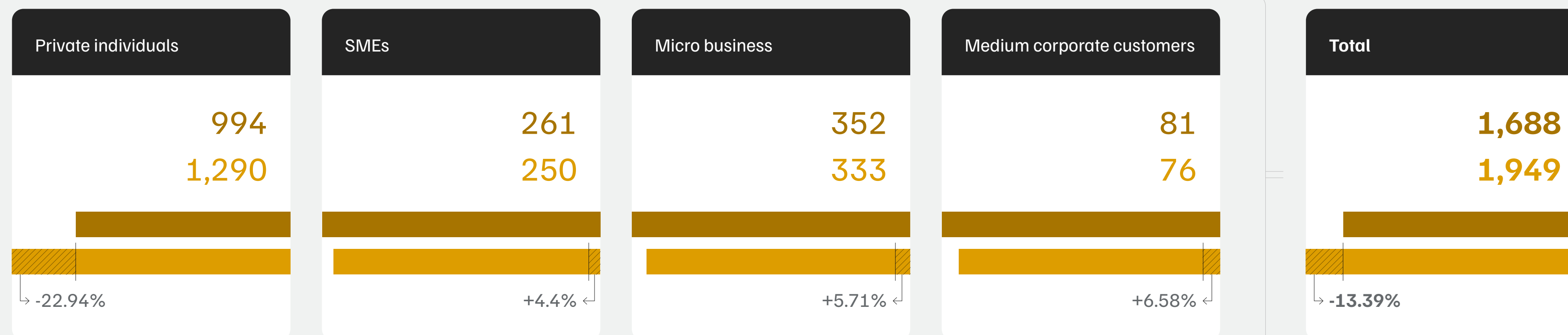
BT Leasing MD S.R.L. is the first company opened by BT Group in the Republic of Moldova and, for the seventh consecutive year, is ranked 1st by the size of its financing portfolio. It provides financial leasing of various movable assets and aims to be a reliable partner to local entrepreneurs, building a range of products and services dedicated primarily to them.

BTL MD provides financing for the purchase of new or second-hand fixed assets through leasing, for a period ranging from 1 to 5 years. The fixed assets included in the financing category mainly cover automobiles, equipment and machinery, and any other asset that can be considered as fixed asset according to the financial accounting regulations.

Lease financing is available to private individuals, authorized private individuals (sole proprietors and professionals), and entities of various forms of organization in the Republic of Moldova, such as SRL, SA, SNC, or public associations.



BT Leasing MD active customers



1.3 Organizational structure

Banca Transilvania is the parent company of the BT Financial Group and holds a majority stake in its subsidiaries. Most of BT Financial Group's subsidiaries bear the BT brand and corporate identity. The group concept and customer service principles also apply to the subsidiaries operating outside Romania.

Banca Transilvania, through its management, is the controlling shareholder/partner of its subsidiaries, setting the overall group strategy and determining the management structures of its subsidiaries. In its relations with its subsidiaries, Banca Transilvania ensures that an adequate management framework is in place, tailored to the structure, activities, and risks of the group and its entities.

Shareholding

Banca Transilvania is the first bank in Romania to be listed on the Bucharest Stock Exchange (BVB). Communication with shareholders is a very important aspect to us, and more details on this topic can be found in the Investor Relations section.

BT Shareholder Structure	as of Dec. 31 2023	as of Dec. 31 2022
NN Group*	9.36%	10.11%
European Bank for Reconstruction and Development (EBRD)	6.87%	6.87%
Romanian private individuals	22.37%	22.20%
Romanian legal entities	45.13%	43.11%
Foreign private individuals	1.09%	1.05%
Foreign legal entities	15.18%	16.66%
Total	100%	100%

*NN Group N.V. and pension funds managed by NN Pensii SAFRAP S.A. and NN Asigurări de Viață S.A.

Victoriabank Shareholder Structure	as of Dec. 31 2023	as of Dec. 31 2022
Republic of Moldova private individuals	27.42%	27.47%
Republic of Moldova legal entities	0.10%	0.06%
Foreign private individuals	0.30%	0.29%
Banca Transilvania Financial Group	44.63%	44.63%
European Bank for Reconstruction and Development (EBRD)	27.55%	27.55%
Total	100%	100%

BTFG Subsidiaries included in the Sustainability Report	Direct and indirect holdings of Banca Transilvania	
	as of Dec. 31 2023	as of Dec. 31 2022
BT Mic	100%	100%
BT Leasing	100%	100%
BT Pensii	100%	100%
BT Asset Management	100%	100%
BT Capital Partners	99.59%	99.59%
BT Direct	100%	100%
Improvmnt Credit Collection	100%	100%
Victoriabank	44.63%	44.63%
BT Leasing Moldova	100%	100%
Idea::Leasing	100%	100%
Salt Bank	100%	100%



Management structures at Banca Transilvania

The General Shareholders Meeting (GSM) is the body that ensures the strategic management of the Bank and is responsible for setting the strategic organizational goals and for allocating the necessary resources for their achievement, including sustainability initiatives.

The General Shareholders Meeting represents all the shareholders, while its decisions, taken in accordance with the relevant legislation and the provisions of the Articles of Incorporation, are binding on all the shareholders, including those who did not attend the meetings.

The management structure in Banca Transilvania includes:

- the supervisory management body – **the Board of Directors** and
- the top executive management – **the Leaders' Committee.**

The top management of the Bank is ensured by individuals who are mandated with the day-to-day management activity of the bank and who are responsible for the fulfillment of these responsibilities towards the management body, based on the management agreements, the relevant NBR regulations, the legal requirements, and the internal rules.

The members of the **Board of Directors (BoD)** are elected by the shareholders at the GSM, for a four-year term of office, either on the expiry of the mandate or specifically, in the event of one or more vacancies. According to the provisions of the applicable regulations issued by the NBR, the Board of Directors is the body responsible for the management, coordination, supervision, and control. It also conducts analyses and sets programmes for the financial year, to ensure the adequate development of the Bank in the market. Its structure within Banca Transilvania is as follows:

- Chairman of the Board of Directors;
- 6 directors – members of the Board of Directors.

The eligibility criteria for the Board of Directors are those stipulated in the specific legislation (Law no. 31/1990 - the Company Law, GEO No. 99/2006), and the specific regulations of the NBR), as well as those stipulated in the Articles of Incorporation of Banca Transilvania. At the same time, the following criteria are taken into account in the selection process and in assessing the suitability of the members for the position they hold or will hold:

- Criteria of professional competences.
- Criterion of reputation;
- Criterion of governance.

At the same time, independence, and competences relevant to the Bank's impact are analyzed according to the policy on the assessment of the suitability of the members of the governing body of Banca Transilvania, and diversity according to the policy for promoting diversity within the governing body of Banca Transilvania Stakeholders' views on these issues are sought annually when discharging the Board members in their supervisory capacity and when re-electing the Board.. After the approval of the shareholder at the General Meeting of Shareholders and before the effective start of their mandate, the new members of the Board of Directors must obtain the prior approval of the National Bank of Romania. The members of the Board of Directors do not perform any operational tasks, which are the exclusive competence of the Leaders' Committee.

The Chairman of the Board of Directors does not hold the position of CEO as these positions are separate and held by different individuals.



The Board of Directors consists of 6 independent directors and is composed entirely of non-executive directors (7 in number).

Board of Directors Membership

as of Dec. 31 2023

Banca Transilvania

Name / Position / Member type / Nationality / Mandate

Horia Ciorcilă <ul style="list-style-type: none"> Chairman Non-executive Romanian 4 years 	Thomas Grasse <ul style="list-style-type: none"> Vice-Chairman Independent non-executive German 4 years 	Ivo Gueorguiev <ul style="list-style-type: none"> Member Independent non-executive British and Bulgarian 4 years 	Mirela Bordea <ul style="list-style-type: none"> Member Independent non-executive Romanian 4 years
Vasile Pușcaș <ul style="list-style-type: none"> Member Independent non-executive Romanian 4 years 	Florin Predescu Vasvari <ul style="list-style-type: none"> Member Independent non-executive Romanian 4 years 	Lucyna Stanczak Wuczynska <ul style="list-style-type: none"> Member Independent non-executive Polish 4 years 	

Board Committees

as of Dec. 31 2023

Banca Transilvania

Audit Committee <ul style="list-style-type: none"> Ivo Gueorguiev <ul style="list-style-type: none"> Chairman Thomas Grasse <ul style="list-style-type: none"> Member Mirela Bordea <ul style="list-style-type: none"> Member 	Remuneration Committee <ul style="list-style-type: none"> Vasile Pușcaș <ul style="list-style-type: none"> Chairman Horia Ciorcilă <ul style="list-style-type: none"> Member Ivo Gueorguiev <ul style="list-style-type: none"> Member 	Nomination Committee <ul style="list-style-type: none"> Florin Predescu Vasvari <ul style="list-style-type: none"> Chairman Horia Ciorcilă <ul style="list-style-type: none"> Member Ivo Gueorguiev <ul style="list-style-type: none"> Member 	Risk Management Committee <ul style="list-style-type: none"> Thomas Grasse <ul style="list-style-type: none"> Chairman Ivo Gueorguiev <ul style="list-style-type: none"> Member Florin Predescu Vasvari <ul style="list-style-type: none"> Member
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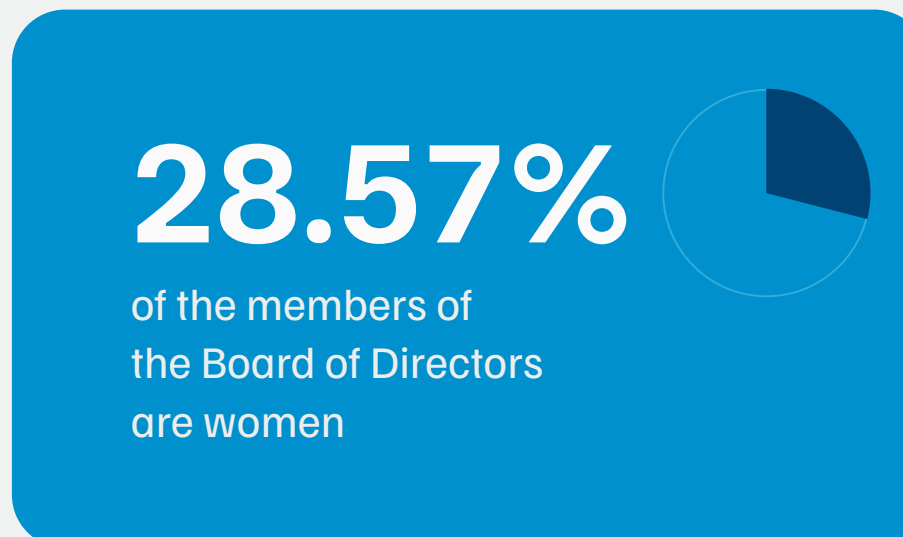
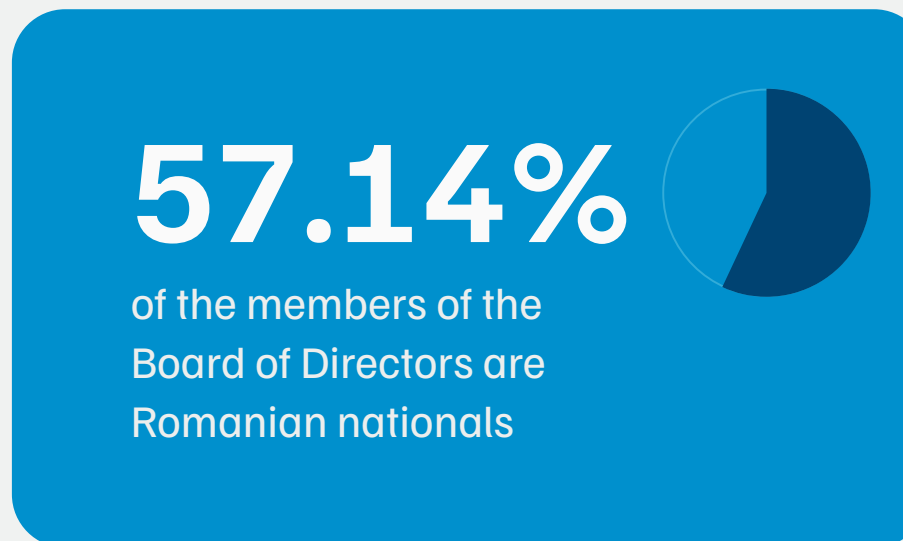
GRI Indicator 405-1-a

Board of Directors membership by gender and age

as of Dec. 31 2023

Banca Transilvania

	women		men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0.00%	0	0.00%	0	0.00%
30-50 years	0	0.00%	1	14.28%	1	14.28%
>50 years	2	28.57%	4	57.14%	6	85.72%
Total	2	28.57%	5	71.42%	7	100.00%



Further details on the responsibilities of each Committee and their activity during the reporting period can be found in the [Report of the Board of Directors of Banca Transilvania 2023](#).

Board of Directors



The members of the **Leaders' Committee (LC)** are appointed by the Board of Directors and are required to meet the legal conditions in force and to be approved by the NBR before starting their mandate according to their position. Under the relevant legal provisions, the Board of Directors mandated the Bank Leaders jointly (and with some exceptions, individually) with the exercise of the Bank's organizational and management functions. The Rules and procedures of the Leaders' Committee are approved by the Board of Directors.

Leaders' Committee Membership

Name / Position / Member type / Nationality / Mandate

as of Dec. 31 2023

Banca Transilvania

<p>Ömer Tetik</p> <ul style="list-style-type: none"> Chief Executive Officer Executive, non-independent Romanian 4 years 	<p>Luminița Runcan</p> <ul style="list-style-type: none"> Deputy Chief Executive Executive, non-independent Romanian 4 years 	<p>Leontin Toderici</p> <ul style="list-style-type: none"> Deputy Chief Executive Executive, non-independent Romanian 4 years 	<p>George Călinescu</p> <ul style="list-style-type: none"> Deputy Chief Executive Executive, non-independent Romanian 4 years
<p>Oana Ilaș</p> <ul style="list-style-type: none"> Deputy Chief Executive Executive, non-independent Romanian 4 years 	<p>Tiberiu Moisă</p> <ul style="list-style-type: none"> Deputy Chief Executive Executive, non-independent Romanian 4 years 	<p>Bogdan Pleșuvescu*</p> <ul style="list-style-type: none"> Deputy Chief Executive Executive, non-independent Romanian 4 years 	<p>*approved by the NBR in April 2023</p>

The committees supporting the activity of the Leaders Committee are:

- Assets and Liabilities Committee (ALCO)
- Procurement Committee (C.Ach)
- Human Resources Committee (CRU)
- Committee for Credit Policy and Approval (CPAC) from BT Headquarters
- Credit Risk Committee from BT Headquarters (Mediation Committee, CCR1, and CCR2)
- Committees Specific to the Activity of the Credit Recovery Department and the Workout, Insolvency, and Bankruptcy Department (CW1, CW2, CRS, CR1, CR2, and CRW)
- Committee for Monitoring Debt Enforcement and Assets Recovery (CMESVA)
- Special Committee for Approval of Legal Enforcement/Litigation Status (CAES)
- Financial Institutions Credit Committee (CCIF)
- Branch Credit and Risk Committee (CCRS)
- Data and Business Intelligence Steering Committee
- Operational Risk Committee (C Risc op.)
- 2nd Tier Control Committee (CCL2)

GRI Indicator 405-1-a

Leaders' Committee membership by gender and age

as of Dec. 31 2023

Banca Transilvania

	women		men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0.00%	0	0.00	0	0.00%
30-50 years	1	14.28%	3	42.86	4	57.14%
>50 years	1	14.28%	2	28.58	3	42.86%
Total	2	28.57%	5	71.43	7	100.00%

100%

of the members of the Leaders' Committee are Romanian nationals

28.57%

of the members of the Leaders' Committee are women



i For further details on the responsibilities of the BoD, LC, and each sub-committee committee and their activity during the reporting period please refer to [Report of the Board of Directors of Banca Transilvania 2023](#), starting on page 99.

Management structures of BT Group subsidiaries in Romania

as of Dec. 31 2023



BT Microfinanțare IFN

Board of Directors

Tiberiu Moisă

- Chairman, non-executive
- term of office - 4 years

Luminița Runcan

- Member, non-executive
- term of office - 4 years

Daniel Szeleky

- Member, non-executive
- term of office - 4 years

Top Management

Cristina Șindile

- General Manager, non-executive
- term of office - 4 years

Valentina Alexandru

- Deputy General Manager, executive
- term of office - 4 years

Marian Ene

- Deputy General Manager, executive
- term of office - 4 years

Dan Cojocaru

- Deputy General Manager, executive
- term of office - 4 years

BT Leasing Transilvania IFN

Board of Directors

Tiberiu Moisă

- Chairman, non-executive
- term of office - 4 years

Ioan Alin Nistor

- Member, non-executive
- term of office - 4 years

Daniel Szeleky

- Member, non-executive
- term of office - 4 years

Top Management

Ionuț-Călin Morar

- General Manager, executive
- term of office - 4 years

Mihai Nicolescu

- Deputy General Manager, executive
- term of office - 4 years

Liviu Serban

- Deputy General Manager, executive
- term of office - 4 years

Corina Portase

- Deputy General Manager, executive
- term of office - 4 years

BT Pensii S.A.F.P.F. SA

Board of Directors

Aurel Bernat

- Chairman, independent, non-executive
- term of office - 4 years

Anca-Eugenia Crăciun

- Member, independent, non-executive
- term of office - 4 years

Cosmin Antoine Constantin Călin

- Member, independent, non-executive
- term of office - 4 years

Top Management

Corina Mădălina Cojocaru

- General Manager, executive
- term of office - 4 years

Dana Corina Benea

- Deputy General Manager Risk, executive
- term of office - 3 years and 6 months

Ionuț Florentin Stroe

- Deputy General Manager Sales, executive
- term of office - 3 years

BT Asset Management S.A.I. SA

Board of Directors

Luminița Runcan

- Chairman, non-executive
- term of office - 4 years

Ioan Alin Nistor

- Member, independent, non-executive
- term of office - 4 years

Oana Ilaș

- Member, independent, non-executive
- term of office - 4 years

Top Management

Dan Dascăl

- General Manager, executive
- term of office - 4 years

Călin Condor

- Deputy General Manager, executive
- term of office - 4 years

BT Capital Partners

Board of Directors

Costel Lionăchescu

- Chairman, independent, non-executive
- term of office - 4 years

Ömer Tetik

- Member, independent, non-executive
- term of office - 4 years

Leontin Toderici

- Member, independent, non-executive
- term of office - 4 years

Top Management

Daniela Secară

- General Manager, executive
- term of office - 4 years

Mihai Milchiș

- Deputy General Manager, executive
- term of office - 4 years

Mirela-Lenuța Buduroiu

- Deputy General Manager, executive
- term of office - 4 years

Vlad Pintilie

- Deputy General Manager, executive
- term of office - 4 years

Management structures of BT Group subsidiaries in Romania

as of Dec. 31 2023

BT Direct IFN

Board of Directors

Gabriela Nistor

- Chairman, non-executive
- term of office -4 years

Florentina Virginia Mircea

- Member, non-executive
- term of office -4 years

Oana Ilaş

- Member, non-executive
- term of office -4 years

Top Management

Nicoleta Bott

- General Manager, executive
- term of office -4 years

Gabriel Gogu

- Deputy General Manager Risk, executive
- term of office - 4 years

Iuliana Puhalschi

- Deputy General Manager Finance, executive
- term of office - 4 years

Improvement Credit Collection

Board of Directors

Bogdan Pleşuvescu

- Chairman, non-executive
- term of office - 10 years

Luminița Runcan

- Member, non-executive
- term of office - 10 years

George Călinescu

- Member, non-executive
- term of office - 10 years

Top Management

Paul Țupa

- General Manager, executive
- unlimited term of office

Ștefan Dan Dragomir

- Deputy General Manager
- unlimited term of office

Idea::Leasing

Board of Directors

Tiberiu Moisă

- Chairman, non-executive
- term of office - 4 years

George Călinescu

- Member, non-executive
- term of office - 4 years

Dan Manolescu

- Member, independent
- term of office - 4 years

Top Management

Corina Portase

- Manager
- term of office - 4 years

Liviu Onuț Șerban

- Manager
- term of office - 3 years

Salt Bank

Board of Directors

Mioara Popescu

- Chairman
- term of office: until December 31, 2023

Ömer Tetik

- Member, non-executive
- term of office - 4 years

Tiberiu Moisă

- Member, non-executive
- term of office - 4 years

Costache Lionăchescu

- Member, non-executive, independent
- term of office - 4 years

Ivo Gueorguiev

- Member, non-executive
- term of office - 4 years

Top Management

Gabriela Nistor

- General Manager, executive member
- term of office - 3 years

Robert Anghel

- Deputy General Manager Business, executive member
- term of office - 4 years

Sinan Kircali

- Deputy General Manager Operations, executive member
- term of office - 4 years

Sorin Dumitrescu

- Deputy General Manager Risk, executive member
- term of office - 4 years

Constantin Daniel Popescu

- Deputy General Manager Technology, executive member
- term of office - 4 years



Management structures at Victoriabank

Within Victoriabank, the **General Meeting of Shareholders (GMS)** is the highest authority of the Bank. Decisions taken by the GMS on matters within its competence are legally binding on both the Bank's governing bodies and shareholders.

The GMS's responsibilities include:

- Approval of the Bank's Statute, including possible amendments/completions;
- Approval of the AGM Regulations;
- Approval of the Board of Directors Regulations, election of Board members, and setting of annual remuneration and compensation.

The governing bodies of the Bank are:

- the **Board of Directors (BoD)** and
- the **Steering Committee (SC)**.





The Board of Directors (BoD) is the governing body that oversees the management decision-making process and monitors the implementation of the strategic objectives defined within the governance and corporate culture framework, being responsible for the Bank's overall business, performance, and financial viability.

The Board of Directors has set up specialized committees composed exclusively of its members to perform its activities in specific areas of expertise.

Currently, the Board of Directors of Victoriabank has 4 Committees:

- The Audit Committee
- The Risk Management Committee
- The Nomination Committee
- The Remuneration Committee

28.57% of the members of the Board of Directors are Republic of Moldova nationals.

0% of the members of the Board of Directors are women.

Board of Directors membership

Name / Position / Member type / Nationality / Mandate

as of Dec. 31 2023

Victoriabank

<p>Victor Țurcan</p> <ul style="list-style-type: none"> • Chairman • Non-executive • Moldovan • 4 years 	<p>Thomas Grasse</p> <ul style="list-style-type: none"> • Vice-Chairman • Non-executive, independent • German • 4 years 	<p>Igor Spoială</p> <ul style="list-style-type: none"> • Member • Non-executive, independent • Moldovan • 4 years 	<p>Tiberiu Moisă</p> <ul style="list-style-type: none"> • Member • Non-executive • Romanian • 4 years
<p>Peter Franklin</p> <ul style="list-style-type: none"> • Member • Non-executive, independent • British • 4 years 	<p>Maris Macinskis</p> <ul style="list-style-type: none"> • Member • Non-executive, independent • Latvian • 4 years 	<p>Sabaz Mehmet</p> <ul style="list-style-type: none"> • Member • Non-executive, independent • Turkish • 4 years 	

Board of Directors Committees

as of Dec. 31 2023

Victoriabank

The Audit Committee is responsible for monitoring the effectiveness of the Bank's internal control, internal audit, and risk management systems, overseeing the external auditors, reviewing, and approving audit scopes and frequency, reviewing audit reports, and verifying that the Steering Committee (SC) takes timely corrective action to address control deficiencies, non-compliance with laws, regulations, policies, and other issues identified by the auditors.

The Risk Management Committee is responsible for advising management on the bank's current and future risk tolerance/appetite and risk strategy and oversees the implementation of that strategy.

The Nomination Committee is responsible for identifying and recommending candidates for membership of the governing bodies and individuals applying for key positions for approval, for assessing the suitability of members of the governing bodies and individuals holding key positions, for proposals related to the results of these assessments, for contributing to the development of appropriate internal policies on assessing the suitability of members of the governing bodies and individuals holding key positions.

The Remuneration Committee is responsible for developing the Bank's remuneration policy and practices and the principles underlying them, for directly overseeing the remuneration of Steering Committee members and key individuals, for contributing to the development of remuneration policies and practices, including performance measurement methods and performance criteria, so that they are consistent with and promote sustainable and effective risk management, including avoiding conflicts of interest.

i For further details on the roles and responsibilities of the Board of Directors and the Steering Committee, as well as information about the committees that support the activity of both structures, can be found [here](#).

GRI Indicator 405-1-a

Board of Directors membership by gender and age

as of Dec. 31 2023

Victoriabank

	women		men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0.00%	0	0.00%	0	0.00%
30-50 years	0	0.00%	2	28.57%	2	28.57%
>50 years	0	0.00%	5	71.43%	5	71.43%
Total	0	0.00%	7	100.00%	7	100.00%



The **Steering Committee (SC)** is the executive body of the Bank which organizes, directs, and is responsible for the day-to-day operations of the Bank, effectively and prudently managing the business of the Bank in a manner consistent with the Bank's strategy and management framework approved by the Board of Directors and reports to it.

Steering Committee membership

as of Dec. 31 2023

Name / Position / Member type / Nationality / Mandate

Victoriabank

Levon Khanikyan*	Donica Vasile	Sorin Şerban
<ul style="list-style-type: none"> Chairman Executive Armenian 4 years 	<ul style="list-style-type: none"> Vice-Chairman Executive Moldovan 4 years 	<ul style="list-style-type: none"> Vice-Chairman Executive Romanian 4 years
Vitalie Corniciuc	Ionela Maloş	<p>*Mr. Bogdan Pleşuvescu held this position until January 12, 2023. Subsequently, with the prior approval from the National Bank of Moldova of Mr. Levon Khanikyan, assumed the position of Executive President of the Bank from that date.</p>
<ul style="list-style-type: none"> Vice-Chairman Executive Moldovan 4 years 	<ul style="list-style-type: none"> Vice-Chairman Executive Romanian 4 years 	

40% of the members of the Steering Committee are Republic of Moldova nationals.

20% of the members of the Steering Committee are women.

GRI Indicator 405-1-a

Steering Committee membership by gender and age

as of Dec. 31 2023

Victoriabank

	women		men		Total	
	No.	%	No.	%	No.	%
<30 years	0	0.00%	0	0.00%	0	0.00%
30-50 years	1	20.00%	3	60.00%	4	80.00%
>50 years	0	0.00%	1	20.00%	1	20.00%
Total	1	20.00%	4	80.00%	5	100.00%

i For further details on the roles and responsibilities of the Board of Directors and the Steering Committee, as well as information about the committees that support the activity of both structures, can be found [here](#).



2

Key highlights & achievements in 2023

2.1 The Group's sustainability achievements and recognition

2.1.1 Other Awards and Memberships

2.2 Key figures 2023

2.3 EU Taxonomy

2.4 Economic performance

2.1

The Group's sustainability achievements and recognition



At BT Financial Group, collaboration is a key element in promoting sustainable development.

This underlines our commitment to initiatives that resonate with the core values and principles on which our organization was founded.

Partnering towards common goals not only cultivates positive outcomes but also strengthens our commitment to sustainability.

Implementing the United Nations Environment Programme Principles for Responsible Banking (PRB): Finance Initiative (UNEP-FI)

In 2022, we adhered to the UNEP-FI Principles for Responsible Banking and in 2023 we started implementing these principles in our operations.

After adherence to the UNEP FI's (United Nations Environmental Programme - Finance Initiative) Principles for Responsible Banking (PRB), in February 2022, BT launched the impact analysis portfolio, which highlights how the bank's activities can impact on the economy, the environment, and the society and contribute negatively or positively to sustainable development.

The identification of areas with potential positive and negative impact, tailored to the whole portfolio, was carried out using the UNEP FI Portfolio Impact Analysis Tool, which has been available since February 2023. The analysis considered BT's entire portfolio of loans and products, with its particularities, divided into two main categories:

- Retail clients (private individual clients);
- SME & Corporate clients.

The portfolio analysed was focused on customers resident in Romania, as this is the main geographical area in which the bank operates. To determine the impact of BT's portfolio, data by sector of activity (based on NACE codes) were selected for analysis, and "national priorities" relevant to the Sustainable Development Goals were considered. The total lending product was used as the basis for data collection. The aim was to identify the main sectors in the portfolio with a negative environmental impact and areas with a potential contribution to climate risk mitigation.

Based on the impact analysis, the main areas of both positive and negative impact are as follows:

For SME & Corporate clients

The portfolio's positive impact was mainly determined in the following areas:

- Availability, accessibility, and quality of resources and services
- Healthy Economies
- Infrastructure

From a negative impact perspective, circularity will be considered in the target setting process for the next period, as it was found to be validated in the negative impact area for 3 out of the 5 categories defined based on the NACE codes for SME & Corporate clients: Construction and Industry, Utilities and Transport, Agriculture and Food Processing.

For retail clients

Availability, accessibility, and quality of resources and services has been identified as an area where BT should focus on defining goals for the upcoming period. Furthermore, we will give equal attention to key impact areas identified as priorities in the model, namely: financial = equality and justice areas. Based on the results of the impact analysis and the country's priorities, the areas of Healthy Economies, Availability, Accessibility, and Quality of Resources and Services have been selected as key areas of significant impact that we intend to prioritize to define the goal-setting strategy. Considering the results and the key global issues, we will also consider "Circularity" as an area that we need to address in the coming years, while continuing our current efforts to reduce other negative environmental and social impacts.

i The Banca Transilvania self-assessment report for the implementation of the Principles for Responsible Banking can be accessed [here](#).

Credit ratings, ESG ratings, and recognitions obtained by Banca Transilvania in 2023

Sustainalytics Rating

For the second consecutive year, Banca Transilvania received a Low ESG Risk rating from [Sustainalytics](#). BT achieved a score of 15.1, an improvement in its score from 2022 (17). This score places BT 122nd (up from 133rd in 2022) out of 1,038 banks surveyed globally. This score also places us in the top 11% of both all companies analyzed by Sustainalytics, and all banks assessed. Sustainalytics analyzed the following areas: corporate governance, integration of ESG factors into the business model, quality and sustainability of products and services offered to customers, data privacy and security, business ethics, and human capital development.

The analysis criteria considered 10 international standards and frameworks such as the Global Reporting Initiative, the Sustainability Accounting Standards Board, the Task Force on Climate-related Financial Disclosures, and the World Economic Forum.

Refinitiv Rating

In 2023, Banca Transilvania received a very good rating score, of 81/100 (A-) from Refinitiv, a London Stock Exchange Group company. This score places Banca Transilvania 51st from 1123 evaluated banks surveyed globally. Refinitiv evaluation comprises the 3 ESG pillars (Environment, Social, and Governance), with accents on specific sub-pillars like Emissions, Resource Use, Innovation, Human Rights, Product Responsibility, Workforce, Community Management, Shareholders, and CSR Strategy.

Banca Transilvania ranked first in the majority of these categories and subcategories, based on the received scores. Solid performances, of over 80 points, were achieved by BT in Corporate Governance (84/100 points) and Environment (84/100 points) categories.

The analysis criteria are based on 10 international standards and frameworks, such as the Global Reporting Initiative, Sustainability Accounting Standards Board, Task Force on Climate-related Financial Disclosures, or the World Economic Forum.

FTSE Russell

BT also received an ESG score of 3.5/5 from [FTSE Russell](#) in December 2023. FTSE Russell Group is one of the world's best-known organizations providing benchmarks for global financial markets. It is a London Stock Exchange Group (LSEG) company and provides data analysis, ratings, and benchmarks for analysts and investors. The ESG Index is the result of a three-pillar assessment: environmental, social, and governance, using more than 300 indicators that analyze bank exposure and how BT manages ESG.

Credit ratings

Moody's Rating

In 2023, BT received its first credit rating from [Moody's](#). Banca Transilvania received an investment grade rating, which noted robust capital, solid profitability indicators, aided by its market leadership and strong business growth potential, granular deposit-based funding, and ample liquidity.

Moody's considers BT to be managing risk adequately despite its appetite for growth, both organically and through acquisitions. The stable outlook on BT's long-term ratings reflects Moody's expectation that financial performance, particularly capital and profitability, will remain strong despite a less favorable macroeconomic environment and if the liability structure does not change significantly to meet MREL requirements.

Fitch Rating

[Fitch Ratings](#) reaffirmed BT's long-term rating at "BB+" with a stable outlook and its viability rating (VR) at "bb+ ". BT's ratings reflect its strong and well-established domestic presence, solid capital buffers supported by strong internal capital generation, solid profitability, good asset quality, and a stable funding profile.

2.1.1 Other Awards and Memberships

Associations in which BT Group is a member through its companies:

BT Financial Group

Association/Organization	The company holds a position in the management structures
National Association of Romanian Exporters and Importers	No
French Chamber of Commerce, Industry, and Agriculture in Romania	No
Romanian Banks Association	Gabriela Cristina Nistor, Vice-President of the Governing Board
European Money Market Institute	No
Romanian Fintech Association – PAGO	NO
Association of the American Chamber of Commerce in Romania – AmCham	Luminița Runcan, member

Education Cluster Association – C-EDU	No
Agro Food Cluster Association Ind Napoca	No
Romanian Factoring Association	No
Aspen Institute Romania Association	Ömer Tetik, member
Romanian Transmedia Audit Bureau Association	No
British Romanian Chamber of Commerce	No
Association for Investor Relations at the Romanian Stock Exchange – ARIR	Ioan Șumandea Simionescu, Vice-President of the Governing Board
ACI Romania Financial Markets Association	Luminița Runcan, President
Women Entrepreneurs' Patronage	No
HR Management Club Association	No
Electronic Payments Association of Romania – APERO	Marius Flore, member
Romania Green Building Council	No
Romanian Private Investment Association – ROPEA	No
Diversity Charter	No

European Business Association	No
Association of Banks of Moldova	No
Oaklins Romania	Daniela Secară, member
Romanian Brokers Association	No
Association for Private Pension Administration in Romania – APAPR	No
Association of Financial Companies in Romania – ALB	No
ALB Consumer Credit Council	Liviu Șerban, member of the Governing Board and Vice-President of the Leasing Council
Romanian Association of Fund Managers (AAF)	Dan Dascăl, member
Microfinance Association of Romania	No
European Microfinance Network (EMN)	No
Social Finance Alliance	No
Association of Romanian Investors in Moldova (AIR)	No
The American Chamber of Commerce in Moldova (AmCham)	No
Association of Commercial Debt Management (AMCC)	No

BT achieved the maximum Vektor rating (10/10) for Shareholder Communication

Association for Investor Relations at the Romanian Stock Exchange (ARIR)

**BT – Bank of the Year
Banker of the Year - Ömer Tetik
BT - Best financial institution loyalty programme - for STAR**

Mastercard & wall-street.ro

BT – Best Investor Relations Company

BT – Rising star in ESG

Association for Investor Relations at the Romanian Stock Exchange (ARIR)

Gold-level recognition for its Sustainability Report BTFG 2022

Romanian Corporate Sustainability and Transparency Index (CST Index)

BT, the most traded share on the regulated market of the Bucharest Stock Exchange

BT Capital Partners, consistency in supporting the financing carried out by the Ministry of Finance

Bucharest Stock Exchange

**BT – Employer of the Year
BT - Sustainability Project of the Year: Area Governance**

Business Review Awards

BT and Stup - Best digital onboarding workflow

BT – Customer of the year

The Effie Awards

BT - Recognition of the largest GHG reduction in Central Europe

International Finance Corporation (IFC)

Oana Ilaş - 100 most powerful women in business 2023

Business Magazin

BT – Strongest Romanian Brand

Brand Finance

Our Performance

Idea::Bank becomes Salt Bank, the first Romanian 100% digital bank

Banca Transilvania



>3.7 mil. private individuals customers

>450,000 corporate customers

>3.7 mil. single digitized retail customers



6 mil. cards in portfolio

511 units

>1,800 ATMs

>126,000 POSs



RON 1 billion green financing granted to companies in 2023

1 out of 7 mortgages granted in 2023 were green mortgages

BT issues the first sustainability bonds

Victoriabank



~300,000 individual customers

>12,000 corporate customers

BT Mic



>28,000 small businesses supported

~40,000 loans granted



>RON 31 mil. green financing granted to companies in 2023

41% of the loans in BT Mic's portfolio are granted to women-owned businesses

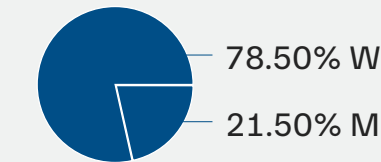
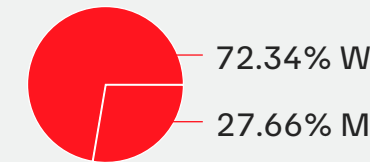
Our People & Communities



12,680 employees

Romania: 11,285

Moldova: 1,395



>RON 10.8 mil. annual training budget of BTFG

59 the average number of training hours provided annually to BTFG employees

74 the average number of training hours provided annually to BT employees



RON 85.77 mil. total sponsorship value at Group level

>475 funded projects



>80% of the BTFG suppliers expenditures in Romania and Moldova are directed towards local suppliers

Environment



75% of the electricity purchased by BTFG came from renewable sources



We calculated for the second year in a row the emissions associated with our portfolio

2.2

Key figures 2023

EU Taxonomy Disclosures

Reporting requirements according to the provisions of Article 8 of Regulation 852/2020 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investments

Banca Transilvania Financial Group prepared the EU Taxonomy report in accordance with the Delegated Act supplementing Article 8 of the Taxonomy Regulation (Disclosures Delegated Act 2021/2178 - DDA). The reporting is based on the prudential consolidation as per the prudential reporting requirements for financial institutions outlined in Regulation (EU) No 575/2013 and Commission Implementing Regulation (EU) 2021/451 (FINREP). The consolidated taxonomy reporting includes the following entities: Banca Transilvania, Victoriabank, BT Direct, BT Asset Management, BT Leasing Transilvania, BT Capital Partners, Improvement Credit Collection, BT Pensii, Idea Leasing, Salt Bank, BT Leasing Moldova, BT Microfinantare.

The EU Taxonomy Regulation 2020/852 establishes a classification system for sustainable economic activities. Article 3 of the Regulation sets out criteria for determining which activities can be considered environmentally sustainable and provides a framework for investors and companies to disclose the environmental impacts of their activities. The Regulation aims to promote sustainable finance and increase transparency in the financial markets by providing a common language for assessing the sustainability of investments.

The Taxonomy is based on two key concepts related to the economic activities of companies subject to the Non-Financial Reporting (NFRD) disclosure requirements:

- **Taxonomy Eligibility** – refers to the high potential of an economic activity to contribute to the achievement of any of the six environmental objectives.
- **Taxonomy alignment** - refers to an eligible economic activity that makes a substantial contribution to at least one of the six climate and environmental objectives of the Taxonomy, while also doing no significant harm ('DNSH') to the remaining objectives and meeting minimum standards on human rights and labour standards ('MSS')

This report presents the Group's green asset ratio (GAR) indicator for the first time. The GAR indicator shows the proportion of assets related to taxonomy-aligned activities compared to the total assets relevant to the GAR. The extensive disclosure requirements relating to taxonomy alignment are presented in detail below in line with the templates contained in Annex VI and XII to the Disclosures Delegated Act.

Methodology, assumptions and limitations used for assessing alignment with Taxonomy

For year-end 2023, Banca Transilvania reports on the taxonomy eligibility and alignment for the six climate and environmental objectives. The tables in Annex VI DDA are duplicated based on the turnover and CAPEX KPI of the bank's counterparty.

The NACE codes considered for reporting purpose are those for the main activity of the counterparties.

The identification of the taxonomy eligible and aligned economic activities for the six climate and environmental objectives was performed for in-scope counterparties: (non) financial undertakings subject to NFRD disclosure obligations, households, local government financing and Collateral obtained by taking possession: residential and commercial immovable properties, as defined in the Article 8 of the Disclosure Delegated Act.

Currently, the taxonomy regulation is limited to financial and non-financial undertakings that are subject to NFRD reporting obligations and is applicable

for a limited number of economic sectors. Banca Transilvania Financial Group has a large exposure to small and medium-sized enterprises (SMEs) which are currently not covered by the Taxonomy reporting requirements, as well as large exposure in sectors such as crop and animal production (agriculture) and healthcare, which are currently out of scope for determining Taxonomy eligibility.

For general purpose financing granted to the counterparties subject to the NFRD the turnover and CAPEX KPI were collected from their most recently published non-financial reports. As most of the non-financial entities have not yet published their 2023 reports, while BT aims to comply with the imposed deadline of 30 June 2024, the eligibility and alignment reporting for these entities is based on the data published for 2022 (which is the most recent and relevant proxy) in line with market practice.

The reporting status of our clients in terms of eligibility and alignment with the EU Taxonomy is notably low, with less than 20% of companies subject to the NFRD including alignment data in their reports as of December 2022. Obtaining this data presented challenges in the process of collection of necessary information. Additionally, it should be noted that certain companies delayed reporting on taxonomy-eligibility until 2024 due to their minimal impact on climate change adaptation or mitigation, and their exemption from compliance with the Delegated Regulation EU 2021/2139. As a result, in assessing eligibility, we used collected KPIs on turnover and CAPEX for the relevant companies. In the cases where companies did not disclose their KPIs, we took into account their primary NACE code classification and the information available on the EU Taxonomy Compass platform. Consequently, the exposure of these entities was reported as 100% eligible according to the applicable criteria.

Where the use of proceeds is known, financial institutions are required to assess whether the information provided by their counterparties on the alignment of economic activities with the Taxonomy provides sufficient evidence that the relevant individual Technical Screening Criteria (TSC) are met. The Group has performed a one-off assessment of the alignment of green loans with the taxonomy - for exposures with a known use of proceeds, that meet the technical criteria of contributing to climate objectives. The assessment was carried out based on the provisions of the EU Regulation 852/2020 and the information provided by clients.

For financial undertakings the publication of their taxonomy alignment indicators is delayed for 2025 based on 2024 information, therefore we have not reported any value for the taxonomy alignment indicator.

For household exposures analysed at the individual level, we used building-specific information such as energy performance certificates and valuation reports which included physical risk analysis. For the purposes of this report, the alignment analysis for loans secured by residential immovable property was carried out only at the Banca Transilvania level. The portfolio reported as aligned consisted of properties with an energy performance certificate (EPC) class A and no recorded physical risk events. The physical risk analysis is based on the appraisal report of property secured with mortgage loan, in accordance with our internal policy guidelines regarding the collaterals and evaluation risks. This policy requires technical expertise in cases where atypical land aspects are identified during property inspections, such as landslides, flooding, or contamination. According to the Final Report on Minimum Safeguards published by the Platform on Sustainable Finance ("the EU Platform"), households

and public authorities are not required to meet the minimum safeguards requirements set out in Article 18 of the taxonomy regulation.

For exposures to households classified as motor vehicles loans the taxonomy alignment is currently not available because the assessment of DNSH criteria is not feasible.

Exposures to local governments are reported as eligible based on the NACE code classification and information available on the EU Taxonomy Compass platform since local governments do not report Taxonomy data.

Following internal analysis, the Group has no relevant assets under management to be reported for 2023.

The total covered assets are calculated as the gross carrying amount as per the prudential consolidation of Banca Transilvania Financial Group of total assets excluding the exposures towards central governments, central banks, supranational issuers and the trading portfolio.

For the flow reporting, the main assumption is related to the categories of assets in scope. As specified in the question no. 65 of the EU's FAQ published in December 2023, when computing the flow KPI in template 4 of Annex VI DDA, the credit institution shall only consider the gross carrying amount of newly incurred exposures (i.e. new loans and advances, debt securities equity instruments). Consequently, we have used the Template 1 from Annex VI DAA where we have filled in the new Taxonomy eligible and aligned loans and advances, debt securities and equity instruments to NFRD-relevant undertakings and household, as the basis for calculating the percentages published in "GAR KPI flow" templates. However, this supporting template is not published.

Summary of KPIs disclosed under Article 8 Taxonomy Regulation

Amounts in EUR mil.

		Total environmentally sustainable assets	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	258.82	1.38%	1.46%	57.64%	66.47%	41.82%
		Total environmentally sustainable assets	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	193.03	3.00%	3.07%	31.57%	82.35%	44.08%
	Trading book*						
	Financial guarantees	1.03	0.57%	3.80%			
	Assets under management	0.00	0.00%	0.00%			
	Fees and commissions income**						

The comprehensive tables of disclosures are available for review in [Annex 1](#).

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

**Fees and commissions income from services other than lending and AuM

Institutions shall disclose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

*** % of assets covered by the KPI over banks' total assets

****based on the Turnover KPI of the counterparty

*****based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Note: Across the reported Annexes, cells shaded in gray are not to be reported

Economic performance

BT Group's consolidated net profit was RON 2.98 billion, 20% higher than in 2022, of which RON 2.49 billion was attributable to the bank, 14% higher compared to 2022. The bank's operating profit increased to over RON 3.5 billion, almost 30% higher than in 2022.

Within the company, the Tax Department ensures compliance with current tax legislation and adapts to any legislative changes that may have a tax impact. The tax department also seeks to optimize tax expenditure and to take advantage of all the opportunities offered by current legislation. The management body or executive position responsible for evaluating the tax strategy is represented by the Deputy General Manager, CFO. The objectives of the Tax Department, as well as its management, organizational structure, activities, duties, and specific responsibilities, are set out in the Rules of Organization and Administration.

In addressing the tax risks, collaboration is ensured with the Corporate Governance and Litigation Department. In addition, to comply with legal requirements and protect the bank's assets, an Internal Rule on Preventive Financial Control is available on the organization's intranet. Regular inspections by internal and external auditors represent another tool to verify and control fiscal activity.

	2023		2022	
	at Bank level thousand RON	consolidated, at Group level thousand RON	at Bank level thousand RON	consolidated, at Group level thousand RON
Direct economic value generated:	6,063,968	7,211,874	5,081,968	5,784,801
Operating income	6,437,146	7,724,962	5,359,989	6,279,956
Impairment on financial assets not measured at fair value through profit or loss and other provisions	-373,178	-513,088	-278,021	-495,155
Gross revenue	10,589,150	12,194,248	7,540,497	8,652,249
Economic value distributed	4,476,244	5,130,492	3,703,969	4,096,384
Operating expenses (depreciation amortization and other operating expenses)	1,321,476	1,538,393	1,276,128	1,328,215
<i>Of which community investments</i>	79,462	85,762	30,500	34,200
Personnel expenses (including paid salary contributions: social protection, payroll tax, etc.)	1,613,996	1,967,518	1,385,160	1,655,533
Dividends distributed to shareholders*	902,848	902,848	800,000	800,000
Income tax expense	637,924	721,733	242,681	312,636
Economic value retained	1,587,724	2,081,382	1,377,999	1,688,417

State financial aid	2023 consolidated, at Group level RON
Tax exemptions and loans**	25,588,340
Other financial benefits paid or payable by any public authority for any operation***	207,861

*dividends paid in 2023 from the profit of the financial year 2022

**deduction of reinvested profits

***Cluj City Hall aid for a building in an industrial park



3

Our commitment to sustainability

- 3.1 Sustainability governance
- 3.2 Sustainability strategy
- 3.3 Approach to stakeholder engagement
- 3.4 Materiality analysis
- 3.5 Environmental and social risk in lending activity

Sustainability governance

Sustainability governance at Banca Transilvania

The General Meeting of Shareholders (GMS) is the body responsible for the strategic management of the bank and is responsible for setting the strategic organizational objectives and allocating the resources required to achieve them, through the income and expenditure budget for the next financial year and the activity programme, including sustainability initiatives.

The Rules of Organization and Administration (ROA) specifically include oversight of the implementation of and adherence to high sustainability (ESG) standards in both lending and day-to-day operations. At the Board level, the Group's sustainability strategy is over a minimum three-year horizon, and is closely aligned with the business strategy. Specifically, the Chairman of the Risk Management Committee has ESG responsibilities and oversees the implementation of the ESG strategy both at the bank and BTFG level, as well as the alignment of risk management policies with ESG standards.

At the same time, ROA stipulates that the Audit Committee is responsible for verifying compliance with internal regulations on ESG standards, while the Remuneration and Nomination Committee approves remuneration and nomination policies in line with ESG principles and standards. Similarly, the Risk Management Committee is also empowered to align sound risk management policies with ESG standards. At the executive management level, the CEO is responsible for coordinating the implementation of the ESG strategy within Banca Transilvania, as well as across the BTFG through the Subsidiaries Division, in collaboration with the departments involved in this process.

ESG Integration & Investor Relations Division

Since 2022, ESG responsibilities have been assigned to the ESG Integration & Investor Relations Division. The department is responsible for overseeing and implementing the Bank's sustainability and responsible business policies, practices and initiatives. Integrating environmental, social and governance considerations into the Bank's strategy, operations and decision-making processes is the primary focus of the department. As ESG issues are integrated and cross-cutting, ESG Integration and IR monitors and implements sustainability best practices to ensure the provision of consistent and continuous data and information.

The ESG Integration and IR Division acts as a catalyst for embedding sustainability and responsible practices throughout the organization. It engages with various stakeholders, leads the integration of ESG into operations, ensures compliance and measures the company's progress towards sustainability goals.

SME and Corporate business line

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

During 2021, the need to establish a dedicated structure emerged, resulting in the set-up of the Sustainable Programmes and Loans Department in April 2022, with the following objectives that cut across all major credit lines at Corporate Clients Level (Large Corporate Clients, Corporate Clients, and Micro/SME Clients):

- Initiates and maintains partnerships with national and international authorities involved in the green/sustainable finance sector;
- Proposes for approval of specific internal regulations for lending to customers making green/sustainable investments;
- Promotes actions and products/services offered by the Sustainable Programmes and Loans Department;
- Develops dedicated green and sustainable programmes and products, initiates and manages training programmes for colleagues in the Banca Transilvania network;
- Identifies customer types together with the branches and business lines and promotes financing alternatives for various green and sustainable investment projects;
- Supports and implements the bank's sustainability/green sector strategy, aiming to grow the sector portfolio under dispersed and healthy green and sustainable lending;
- Together with colleagues from the abovementioned structures, participates in the implementation of the sustainable development strategy of Banca Transilvania.

Retail Banking business line

Within the Retail Banking business line, there are specific responsibilities for the implementation of objectives in the area in retail products and services. This includes a pronounced emphasis on the integration of green or sustainability components, which are pivotal to the overarching sustainability strategy.

This strategic framework is designed to meet the regulatory requirements and industry standards for environmental sustainability. The business line is tasked with the continuous and rigorous monitoring, implementation, and detailed reporting on the pertinent regulations. This encompasses existing and forthcoming legislation, such as the EU Taxonomy, which sets forth criteria for sustainable economic activities.

Adherence to these regulations ensures that the business operations align with local and international sustainability goals.

Large Corporate Customers business line

Within the Large Corporate Clients business line there is a responsibility to meet and manage the expectations of the most sophisticated client segment with complex financings, including ESG aspects.

Head Office Functions

Reporting to the Deputy CEO, CRO, there is a structure dedicated to environmental and social risk analysis which has significant responsibilities related to environmental and social issues: drafting the environmental policy, conducting E&S risk analysis for corporate clients, providing support and advice to colleagues in the branches, departments or subsidiaries, assessing E&S risk for financing, categorizing client activity by risk level and establishing mitigation measures, monitoring environmental and social incidents reported by clients. Thus, dedicated support is provided to all credit risk analysis departments with financing approval tasks.

In addition, within the non-financial risk management structure, there are specific tasks relating to trend analysis and recognition of new or emerging risks arising from changing market and macroeconomic circumstances and conditions, including potential risks associated with climate change.

A structure with specific responsibilities for the implementation of corporate governance practices and non-financial reporting in accordance with best practices and internationally recognized standards reports to the **Senior Executive Director of Corporate Governance and Litigation**.

Under the **Senior Executive Director, Human Resources**, there are dedicated resources for sustainability topics, in particular those related to the social sphere represented by the bank's employees.

Whether it concerns staff training, maintaining a working climate in line with human rights principles (non-discrimination, equal opportunities), or capitalizing on the benefits generated by a diverse workforce, these resources contribute to the objectives of the business lines through initiatives aimed at increasing the commitment of colleagues and ensuring their professional and personal well-being.

The **Executive Director, Marketing, Communication and PR** coordinates the BT Group's CSR activity, as well as internal and external communication including ESG topics.

Reporting to the **Deputy CEO, COO, the Procurement Department** manages the procurement, investment, and logistics activity, which has recently taken on an increasingly complex role in managing the environmental impact of the Bank's activity, including the selection of suppliers. By integrating ESG considerations into its procurement methodology and policies, BT ensures that the external resources needed to run its business are sourced from appropriate sources that meet the terms of engagement, including ESG criteria. Also, within this structure, the various consumption patterns of the bank and its subsidiaries are monitored and measures to increase their efficiency are identified, both to reduce costs and the negative environmental impact.

The investments made by the BT Group in the facilities pay close attention to current regulations and environmental standards, thus contributing to a reduced negative environmental impact. Logistics also coordinates the way documents are archived within the bank aiming to reduce physical archiving as much as possible and promote electronic archiving.

The Bank's reporting activity falls under the **Deputy CEO, CFO** and includes reporting on sustainability topics such as EU Taxonomy, CRC, etc., through the appointment of specific individuals who liaise constantly with the Sustainability working group to keep up to date with reporting requirements, standards, and best practices.

At the Bank level and covering the full spectrum of activities, the representatives of the above structures form an internal working group coordinated by the CEO. Without becoming a formalized structure, the working group meets regularly to implement the Bank's sustainability strategy and promotes good interdepartmental collaboration, shares knowledge, reviews initiatives, and reports on progress against each strategic objective, either through the Sustainability Report or internal reporting.

Each subsidiary of the BT Group has appointed a person responsible with the sustainability topics. They meet and liaise with the Bank's working group on a regular basis to align the implementation of sustainability initiatives and ensure coordination of tasks and projects in this area.

BT Mic

BT Mic follows the strategic pillars defined in the Sustainability Strategy of the Group 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 General Meeting of Shareholders/Board of Directors. The strategy will be reviewed annually.

At the executive level, the Steering Committee is responsible for the implementation of the ESG strategy objectives, through the relevant departments and the designated persons responsible for this area. The Committee supports the prioritization of objectives resulting from stakeholder consultation (customers, employees, investors, shareholders, regulators), as well as monitoring the target and performance indicators set at the BTFG level.

BT Capital Partners

Management adopts the company's strategy, which includes the integration of ESG principles, in accordance 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.

BT Direct

The General Meeting of Shareholders ("GMS") is the authority that decides on BT Direct's operations and ensures its economic and commercial policy. The BoD and the Management approve BT Direct's sustainability strategy and review the achievement of the performance indicators proposed in the BT Direct Sustainability Strategy 2022-2024. As of 2023, the company has appointed an ESG Officer, holding the position of ESG Governance and Risk Specialist, within the Risk Management and Control Division, to facilitate the company's adaptation and guidance on sustainability.

BT Asset Management

The Sustainability Policy of BT Asset Management S.A.I. is available on the company's website and can be found [here](#). There is also an active Sustainability Committee at BT Asset Management S.A.I. level.

SALT

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

Victoriabank

The highest governing body of the Bank is the Board of Directors of Victoriabank S.A. (BoD) which supervises and monitors the decision-making process of the management and is responsible for the Bank's activity and financial soundness. The Board of Directors has the powers and responsibilities provided for by the regulations, the Bank's Statute, and the Rules of procedure of the Board of Directors. It therefore approves and monitors the implementation of the Bank's strategic objectives, priority business areas, risk management strategy, and management framework. The Board approves the annual business plan, any amendments thereto, the income and expenditure budget and the Bank's social and environmental policies, provided that performance standards are maintained in accordance with the Bank's long-term financial interests and its capital requirements.

BT Leasing Moldova

The General Manager, is the authority that provides oversight of impact management at the company level. Acting in accordance with the provisions of the company's own ROA, the General Manager ensures that the company's aligns with the implementation of group-wide sustainability policies, practices, and initiatives.

The Board also regularly monitors and evaluates the effectiveness of the Bank's corporate governance framework, including the Bank's governance principles, and takes appropriate measures to address any deficiencies. The members of the Board of Directors adopt and review the general principles of the remuneration policy and are responsible for overseeing its implementation, including the approval of the total remuneration budget for the Bank's employees.

At the end of 2022, Programme Coordinator for the Environmental Protection position was created and during 2023, measures were implemented to optimize the consumption of available resources in internal activities. At the same time, an internal working group was set up to start the implementation of an ESG analysis flow in corporate lending.

Sustainability governance within subsidiaries



3.1 **Sustainability strategy**

Our sustainability strategy articulates the way we think today for the generations to come: a plan that goes beyond a simple desire to comply with legislative regulations and is based on a deep sense of responsibility and duty we owe to the planet, our customers, employees, communities, and the Romanian economy at large.

We acknowledge that the complex and interconnected issues we seek to address through our strategy cannot be managed independently, but must be dealt with as an integrated response, with an emphasis on partnerships, collaboration, and above all, the involvement of employees and all stakeholders.

Our sustainability strategy is based on three pillars:

Performance People Environment

All this cannot be achieved without a strong governance system and a solid foundation of values: we are committed to maintaining the highest standards of governance, transparency, and business ethics.

We have established and implemented robust internal systems to support us in achieving the goals and targets we have set for the sustainable development and growth of the financial ecosystem around BT Financial Group.

Performance



We strive to create a fair and inclusive banking system that provides access to financial services for all businesses and people and promotes financial education.

We integrate sustainability criteria into financing decisions and promote responsible financial principles.

We focus on developing our credit and investment portfolio in key sectors to support the transition to a green economy, sectors where we can drive innovation and support solutions that help address social and environmental challenges.

People



We believe that our employees are key to achieving our sustainability goals. We, therefore, prioritize their engagement, well-being, and professional development, while encouraging a diverse and inclusive workplace.

At the same time, we work closely with local communities to understand their needs and together create sustainable solutions to meet the challenges they face.

We also support social initiatives and non-governmental organizations that align with our sustainability vision.

Environment



We are committed to reducing our negative environmental impact, both directly generated and through our lending policies, we are committed to promoting the transition to a low-carbon economy, and we seek to implement solutions that support our responsible resource use.

We are currently in the process of mapping our portfolio's environmental impact and have started our Scope 3 carbon footprint analysis.

Performance

1

Complement the range of products and offers with green finance, financial education, or positive social impact components to support the transition to a more sustainable economy.

deadline 2023

progress 2023

EUR 500 mil. attracted through the first sustainable bonds issuance in 2023: min. 50% projects with social component, such as financing SMEs in socio-economically disadvantaged area in Romania, access to education and access to healthcare.

2

Improve internal skills, both at the head office and network level, by pooling and promoting information resources and practices.

deadline 2023

progress 2023

More than 350 participants from head office and branches attended thirteen trainings, workshops and seminars on ESG topics.

Financial support in obtaining ESG certifications such as CFA Certificate in ESG Investing, Certified ESG Analyst (CESGA) certification etc.

Launched and implemented an internal competition ESG in BT aiming to promote a culture of sustainable business practices.

3

Identify methods to inventory the carbon footprint of our portfolio and measures to progressively reduce it through specific targets with continuous monitoring.

deadline 2023

progress 2023

We assessed the emissions associated with our lending and investment portfolios for the 2nd year in a row (based on PCAF methodology).

These two iterations (2022 and 2023 results) will define the baseline for our target-setting process, a step that will help us monitor and progressively reduce our financed emissions.

4

Expand and adapt the detailed non-financial analysis model currently used for large corporate clients (environmental and social risk assessment) to include other categories of corporate clients across the eligible portfolio.

deadline 2023

progress 2023

As the ESG risk assessment of Banca Transilvania already covers loans granted to all categories of companies, in 2023 we focused on refining and improving the methodology used for the assessment.

We updated the risk levels for a more granular view and extended the risk assessment to include the Governance risk.

5

Develop awareness and education of entrepreneurs on ESG issues through events dedicated to green finance, energy efficiency, and climate risk management (at least two national events - Bucharest & Cluj-Napoca, enabling companies from several counties to participate).

deadline 2023

progress 2023

3 events in Bucharest, Cluj and Timisoara with more than 420 participants.

Performance

6

Achieve a 15% share of green mortgage/real estate loans in total mortgage/real estate loans (balance).

deadline 2024

progress 2023

11.91% was the share of green mortgage/housing loans in 2023 out of the total balance of the mortgage/housing loans (compared to 9.76% in 2022).

7

20% - proportion of green mortgage/real estate loans in new mortgage/real estate loan production.

deadline Annual

progress 2023

18% proportion of green mortgage/housing loans in 2023 out of the total production of the mortgage/housing loans (compared to 24% in 2022).

9

Conduct the portfolio impact analysis according to the UNEP-FI/ PRB methodology.

deadline 2023

progress 2023

The impact analysis report was published in 2023 and can be consulted [here](#).

11

Ensure quality reporting on BT's progress towards sustainability by monitoring and incorporating standards and best practices in the field.

deadline 2022-2023

progress 2023

We published our Sustainability Report for the 4th year in a row, based on the GRI Standards.

We approved the BT Group Sustainable Finance Framework and committed to publish a report on the allocation of proceeds, as well as an impact report, aligned with the approach described in the ICMA "Handbook – Harmonized Framework for Impact Reporting (June 2023)" and "Harmonized Framework for Impact Reporting for Social Bonds (June 2023)".

As we approach 2025, we started the implementation of Corporate Sustainability Reporting Directive and European Sustainability Reporting Standards requirements.

8

Grant green loans worth RON 3.5 million (validated according to CAFI methodology).

deadline 2023-2025

progress 2023

RON 1 billion of new green financing granted in 2023 to companies, an increase of 31% compared to the RON 789.6 mil. granted in 2022.

10

Regular and consistent training for the entire BT team on GDPR and IT security.

deadline Annual

progress 2023

45,788 hours of trainings attended by BTFG employees in 2023 on aspects related to personal data protection (GDPR) and IT Security, with an average of 4h/employee.

People

1

Run CSR and community engagement campaigns independently and with our clients.

deadline 2023

progress 2023

Donations amounting to RON 773 thousands were enabled by BT Pay (10% higher than in 2022) and donated to 25 selected NGOs.

2

Attract a minimum of 70 students to internship programmes.

deadline 2023

progress 2023

Over 200 students benefited from the internship programs of BT Group, in various areas: network, legal team, IT, risk and modelling etc.

3

Allocate an average of 2 hours/ employee/year of training on social and environmental issues: ESG/ diversity/ OHS/ Fire Prevention and Fighting/ business ethics, anti-corruption, anti-fraud, whistleblowing.

deadline Annual

progress 2023

In 2023, BTFG employees received an average of 7 hours of training/ employee on social and environmental topics.

4

Conduct an impact study to measure the positive impact that the Bank has generated through community investments.

deadline 2023

progress 2023

Banca Transilvania assessed in 2023 two CSR projects based on the Community Index, a rating aligned with the most important standards or references at international level, including London Benchmarking Group and Social Return on Investment. Both projects received GOLD recognition in 2023 in tehri respective categories: Peditel (heathcare) and Remesh (Reduce Reuse Recycle).

5

Support local community programmes in sports, culture, and education by allocating a dedicated budget, but also by involving the BT team in volunteering.

deadline Annual

progress 2023

A budget of aproximately RON 86 mil., was allocated by BTFG companies to support the community through more than 470 projects in Romania and Moldova.

At the same time, 200 colleagues participated in volunteering initiatives.

Environment

1

Conduct the indirect emissions inventory (Scope 3).

deadline 2023

progress 2023

During 2023, BT Group finalized the indirect emissions inventory and computed the emissions for all categories considered relevant in our activity.

As of 31 December 2023, the BT Group planned and performed the calculation of indirect emissions in accordance with the requirements of the GHG Protocol. We performed an emissions' calculation for 10 categories in Scope 1, Scope 2 and Scope 2, with four additional categories being analyzed for the first time in 2023.

2

Reduce paper consumption by 10% by implementing digital workflows for products, digital signatures, etc.

deadline 2023

progress 2023

28% reduction of paper consumption (based on materials ordered) compared to 2022 for Banca Transilvania.

3

Replace all cards in circulation with cards made of recycled materials.

deadline 2027

progress 2023

98% of the cards in circulation are cards made of recycled materials, the remaining ones being cards that, due to design features, cannot be printed on recycled materials

4

Expand the Scope 3 emissions inventory to include at least 5 more categories.

deadline 2023

progress 2023

Four new categories were included in 2023 Scope 3 emission assessment: purchased good and services, waste generated in operations, business travel, employee commuting.

5

Decrease greenhouse gas emissions associated with BT Financial Group's car fleet (Scope 1 emissions) by 20% compared to base year 2018.

deadline 2023

progress 2023

In 2022 and 2023 we assessed the Scope 1 emissions based on the GHG Protocol methodology, extending the analyzed categories within Scope 1 to include natural gas and refrigerants, in addition to fuel consumption as it was in 2018. Having a more accurate view on emission sources, a reassessment of the initial targets of Scope 1 is scheduled in 2024.

6

Review and update the list of exclusions under the EBRD Reference List and IFC Performance Standards to reduce exposure on the fossil fuel sector.

deadline Annual

progress 2023

No modifications were deemed necessary to the list of exclusion during 2023, December-2022 being the latest reassessment of the activities excluded.

3.3 Approach to stakeholder engagement

For Banca Transilvania Financial Group, stakeholders are individuals or groups of individuals whose interests are influenced or may be influenced by the organization’s activities. We recognize the complex interaction between our decisions and the wider community and, as such, prioritize fostering constructive relationships with all stakeholders.

Transparency is the foundation of our engagement efforts, ensuring that all stakeholders are informed of our strategic goals, operational performance, and risk management practices. We actively seek feedback and input from stakeholders through our communication channels.

In addition, through our Code of Ethics and Conduct, we communicate to our stakeholders the values and principles to which our employees and members of the governing body adhere.

Stakeholder category	How we engage	Frequency	Communication channels	Top material topic
BTFG employee	<ul style="list-style-type: none"> → BT Employee Experience Index (BT EEI) → Various internal competitions → Employee Net Promoter Score (eNPS) → Consultation as part of the sustainability reporting process 	<ul style="list-style-type: none"> → Permanent 	<ul style="list-style-type: none"> → BT Con(vention), the festival dedicated to employees → Intranet → Sustainability Report 	<ul style="list-style-type: none"> ● Economic value generated ● Business ethics and responsibility ● Access to financial services, inclusion, and financial education
Customers – private individuals and legal entities	<ul style="list-style-type: none"> → Net Promoter Score (NPS) → Întreb BT platform → Meetings → Conferences → Consultation as part of the sustainability reporting process 	<ul style="list-style-type: none"> → Permanent → When needed 	<ul style="list-style-type: none"> → Social Media Channels → Podcast BT Talks → VB Talks → Blog BT → E-mail → Newsletter → Sustainability Report 	<ul style="list-style-type: none"> ● Digitalization and cyber security ● Economic value generated ● Access to financial services, inclusion, and financial education
Shareholders	<ul style="list-style-type: none"> → Meetings → Conferences → Access to information published on the BT website → Consultation as part of the sustainability reporting process 	<ul style="list-style-type: none"> → Quarterly and on request 	<ul style="list-style-type: none"> → Shareholders General Meeting → Conference calls available on the BT website → Roadshows and presentations → Regular information reports and financial results → Newsletter → Board of Directors Report → Latest news → A dedicated page on BT’s website → Sustainability Report 	<ul style="list-style-type: none"> ● Economic value generated ● Digitalization and cyber security ● Business ethics and responsibility

Stakeholder category	How we engage	Frequency	Communication channels	Top material topic
Regulatory authorities	<ul style="list-style-type: none"> → Various consultations → Meetings → Consultation as part of the sustainability reporting process 	<ul style="list-style-type: none"> → Occasional and on demand 	<ul style="list-style-type: none"> → Financial reports → Sustainability Report → E-mail 	<ul style="list-style-type: none"> ● Access to financial services, inclusion, and financial education ● Digitalization and cyber security ● Community investments
Financial institutions	<ul style="list-style-type: none"> → Meetings → Various consultations → Consultation as part of the sustainability reporting process 	<ul style="list-style-type: none"> → Occasional 	<ul style="list-style-type: none"> → Financial reports → Sustainability Report → E-mail 	<ul style="list-style-type: none"> ● Access to financial services, inclusion, and financial education ● Digitalization and cyber security ● Sustainable financing
Investors/ Analysts	<ul style="list-style-type: none"> → Various consultations → Meetings → Consultation as part of the sustainability reporting process 	<ul style="list-style-type: none"> → Annual → Occasional → Quarterly 	<ul style="list-style-type: none"> → Conference calls available on the BT website → Roadshows and presentations → Regular information reports and financial results → Newsletter → Board of Directors Report → Sustainability Report → Dedicated Website 	<ul style="list-style-type: none"> ● Economic value generated ● Digitalization and cyber security ● Business ethics and responsibility

Stakeholder category	How we engage	Frequency	Communication channels	Top material topic
Supplier	<ul style="list-style-type: none"> → Meetings → Consultation as part of the sustainability reporting process 	→ Occasional	<ul style="list-style-type: none"> → Sustainability Report → E-mail 	<ul style="list-style-type: none"> ● Business ethics and responsibility ● Community investments ● Economic value generated
Business partners	<ul style="list-style-type: none"> → Meetings → Consultation as part of the sustainability reporting process 	→ Occasional	<ul style="list-style-type: none"> → Sustainability Report → E-mail 	<ul style="list-style-type: none"> ● Access to financial services, inclusion, and financial education ● Community investments ● Sustainable financing
Nongovernmental organizations	<ul style="list-style-type: none"> → Partnership projects → Consultation as part of the sustainability reporting process 	→ Occasional	<ul style="list-style-type: none"> → Sustainability Report → E-mail 	<ul style="list-style-type: none"> ● Community investments ● Digitalization and cyber security ● Business ethics and responsibility
Industry Associations	<ul style="list-style-type: none"> → Meetings → Consultation as part of the sustainability reporting process 	→ Occasional	<ul style="list-style-type: none"> → Sustainability Report → Financial reports → E-mail 	<ul style="list-style-type: none"> ● Digitalization and cyber security ● Access to financial services, inclusion, and financial education ● Sustainable financing

Investors communication

There are 4 conference calls annually with our investors, according to the financial calendar published on the Bucharest Stock Exchange's website at the beginning of each calendar year.

The following table shows the dates of these calls, as well as the topic of each of them:

Annual conference calls organized by BT	Date	Event	Type of event	Frequency of the event
Investor conference call to present 2022 annual financial results	February 27 th , 2023	Online	Regular event	Once a year
Investor conference call to present Q1 2023 annual financial results	May 5 th , 2023	Online	Regular event	Once a year
Investor video-conference call to present H1 2023 annual financial results	August 28 th , 2023	Online	Regular event	Once a year
Investor video-conference call to present T3 2023 annual financial results	November 13 th , 2023	Online	Regular event	Once a year

At the same time, in 2023, Banca Transilvania's Investor Relations Team participated in 12 international conferences (online or face-to-face) where they met with 126 investors in a total of 66 meetings.

2023

Net Promoter Score – NPS

As the largest bank in Romania, customer satisfaction is one of our top priorities. Thus, we measure our customers' satisfaction internally, using the NPS indicator, at different points of contact with the bank - when opening an account, after a transaction in the unit, at product level, or overall experience with us.

In 2023, the NPS was conducted on a sample of 3,800 people, of which 2,600 corporate clients and 1,200 private individual clients with the following results:

- The NPS score resulting from the responses of customers who have transacted in the units is 84.33 and the HI* is 94.97%. This is an increase of 2.71 compared to 2022. The results show that the bank's customers value human interactions more than email interactions;
- The implementation of the meet and greet concept (colleagues greeting customers) has led to increased customer satisfaction. Similarly, satisfaction increases when customers are offered alternatives to complete transactions online or at MFM (multi functioning machines);
- Implementing of the closed-loop feedback approach, so that any resolvable feedback is forwarded to the Nnetwork or BT Headquarters for resolution. Following this process we found that of the passive customers, around 58% became promoters after the initial mentioned situation was resolved. Similarly, of the initial detractors, ~49% became promoters after the issues raised in their feedback were resolved.

2023

Regarding the external surveys, these were carried out with the help of a market research agency and we measured the perception of private individual and corporate clients. We analyze customer satisfaction and compare it with market benchmarks, perception of BT, competition, and macroeconomic context.

In the campaigns segment, BT is market leader with the highest NPS score, that is 55. There have been notable improvements, particularly in POS terminals, the branch experience (particularly in Bucharest) and the bank's overall reputation, which is trending towards pre-pandemic levels. However, it remains essential to monitor these aspects closely, given their significant influence on customer recommendations. BT's strong association with being a Romanian bank remains a prominent brand attribute, which stands out in all aspects analyzed in the market.

In the retail individual segment, we rank 3rd after ING and Revolut, but we have maintained the growth trend identified in 2022 and narrowed the gap from previous years with an NPS score of 63, an all-time high for the bank, higher than the value recorded in 2022. Customer appreciation for BT comes primarily from factors such as product and service quality, customer-centric orientation, reputation, and skilled staff. In particular, BT clients tend to place a higher value on reputation and infrastructure compared to the market average, with reputation showing a significant increase at the end of 2023 compared to previous assessments.

*HI was calculated according to the formula: (Percentage of very satisfied customers + Percentage of satisfied customers) - (Percentage of dissatisfied customers + Percentage of very dissatisfied customers).

3.4 Materiality analysis

The process by which BT Financial Group identifies its material topics is through its materiality analysis. Material topics are those that reflect the impact (positive and/or negative) on the economy, society, and the environment, including human rights, generated by BT Financial Group's business activities and relationships. This process serves a dual purpose: firstly, it helps us to determine the sustainability indicators that will be presented in the sustainability report, and secondly, it helps us to better understand the risks and opportunities arising from an environmental, social, and governance (ESG) perspective. This, in turn, allows us to improve our engagement and communication process with our stakeholders.

The stakeholder categories that are consulted in the process of defining the material topics were established following a dedicated workshop, organized together with relevant consultants, attended by representatives of the main departments within Banca Transilvania and its subsidiaries. The workshop was dedicated to materiality analysis and included updates to the GRI Standards on the stakeholder consultation process. The workshop identified the categories of stakeholders with which each department has a working relationship.

Following this listing, stakeholders were grouped into 11 main categories:

- BTFG employee
- Customer – private individual
- Customer – Corporate
- Shareholder
- Government Agency/Regulatory Authority
- Financial institution
- Investor/Analyst
- Supplier
- Business partner (consultant, auditor, lawyer, PR agency)
- Non-governmental organization
- Industry association

There were no changes from the previous year in the stakeholder categories included in the consultation.

The questionnaire also included an "Other category" option for respondents who considered that they did not fit into any of the categories identified by the BT Group.

The starting point of this analysis was the identification of potentially material topics, i.e., those topics on which BT Financial Group, through its business activities and relationships, could generate an economic, social, and environmental impact (positive and/or negative), including on human rights.

The list of potential material topics is based on an analysis of the activities of all BT Financial Group entities, our business relationships, the latest studies/reports, and trends in sustainability, the national and European legislative context (including CSRD, SFDR, EU Taxonomy), as well as industry best practices and other sustainability reporting standards e.g. Sustainability Accounting Standards Board (SASB), Task Force on Climate-related Financial Disclosures (TCFD), European Sustainability Reporting Standards (ESRS).

Based on this list, two sets of online questionnaires were developed, one sent to the Group's stakeholder categories (**external analysis**) and one sent to members of management, specialists, and experts from all Group entities (**internal analysis**). The questionnaires included different sections to assess the extent of positive and negative impacts, as not all topics can generate both positive and negative impacts. The questionnaires also provided respondents with the opportunity to provide qualitative (open-ended) responses to identify other areas/fields where BT Financial Group could have an impact, either positive or negative, as well as questions on how we can improve our sustainability process and reporting.

For each potential material topic, the extent of positive and negative impact could be rated on a **scale of 0 to 3** (no impact, low impact, moderate impact, and high impact), and each topic was also accompanied by an explanation of possible forms of impact. Respondents were also given the option to select *N/A - don't know/don't answer*.

This process took place between **November 2023 and January 2024** and a total of **1,705 responses** were recorded, which were centralized and analyzed to highlight both the positive and negative impact dimensions as perceived externally (stakeholders) and internally (management, specialists, and experts).

The analysis resulted in two scores for each topic assessed in terms of positive and negative impacts, represented in the materiality matrix further below. Given that the process of identifying and assessing impact through stakeholder engagement is based on a rather subjective assessment, the materiality threshold was set internally where BT Group's impact is at least low (score 1 on the rating scale provided in the materiality questionnaires).

GRI Indicator 3-2

Compared to the analysis process carried out in the previous year, some material topics have been renamed in line with ESRS Standards, e.g. resource consumption and waste management, responsible employer, climate change mitigation/adaptation have been renamed to resource use and circular economy, our employees, and climate change. As a result of this analysis, a new material issue has emerged, namely water and marine resources, which had been included in resource use in the previous reporting. At the same time, two material themes from the previous financial year (stakeholder engagement and risk management) were not assessed in this materiality analysis as they are implicitly integrated into the operations and business relationships of BTFG. Our approach to these topics is described in this sustainability report.

Therefore, the material topics for BT Financial Group were considered to be those for which either the average of the stakeholder ratings or the average of the internal ratings showed at least a low impact. This approach allows us to take appropriate measures to minimize negative impact as far as possible while aiming to amplify our positive impact.

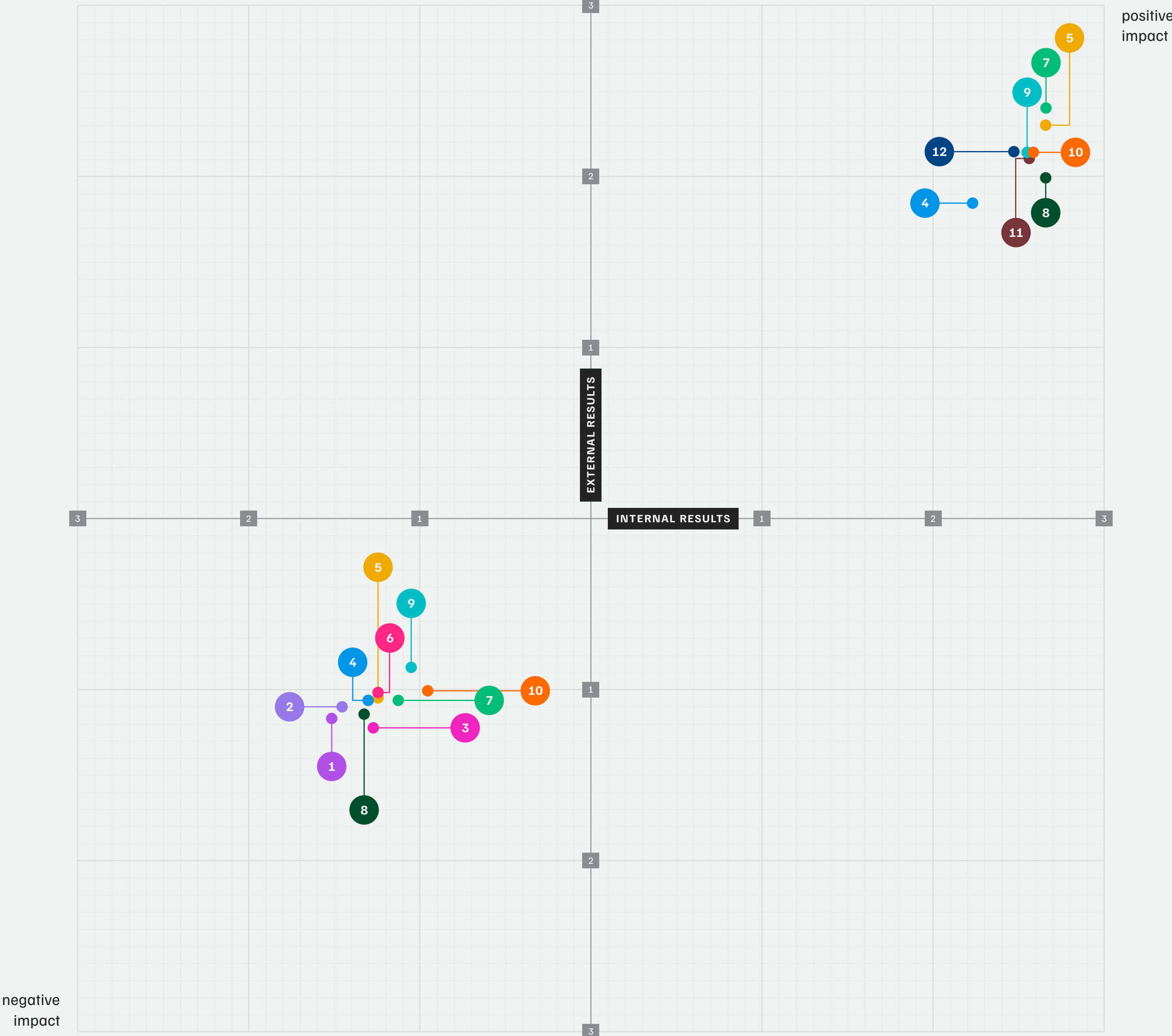
Impact means the effect that an organization has or could have on the economy, the environment, or people, including human rights, as a result of its activities or business relationships. Impacts may be negative or positive, actual, or potential, short, or long term, intended or unintended, reversible, or irreversible.

Materiality matrix

GRI Indicator 3-2

Material topics:

- 1 Environmental impact of our portfolio
- 7 Digitalization and cyber security
- 2 Resource use and circular economy
- 8 Our employees
- 3 Climate change
- 9 Access to financial services, inclusion, and financial education
- 4 Suppliers
- 10 Business ethics and responsibility
- 5 Economic value generated
- 11 Sustainable financing
- 6 Water and marine resources
- 12 Community investments



Impact assessment*

Material topic	Overview of impacts on the economy, environment, and people, including on human rights	Actual/ Potential	Positive/ Negative
● Environmental impact of our portfolio	<p>The environmental impact of our financing portfolio is real and negative, but also potentially negative if the global sustainability context evolves in a direction that prevents the reduction measures we take from having the anticipated effects.</p> <p>To mitigate this impact and reduce the likelihood of it occurring in the future, in 2022 and 2023 we underwent a mapping process of the areas where it occurs and set reduction targets (by joining UNEP-FI, PRB).</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block;">potential</div>	<div style="border: 1px solid gray; padding: 2px; display: inline-block;">negative</div>
● Resource use and circular economy	<p>The internal measures (energy efficiency, reduction of resource consumption, separate waste collection) we take help reduce the pressure we put on natural resources.</p> <p>However, our activity generates both actual and potential negative impacts, manifested in our own operations and in the projects and industries we finance.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block;">potential</div>	<div style="border: 1px solid gray; padding: 2px; display: inline-block;">negative</div>
● Climate change	<p>While increasing the proportion of green funding in our portfolio reduces the negative impact we generate through the projects we fund, we are aware that these efforts need to be further intensified to achieve national, European, and global targets.</p> <p>Gradual implementation of the measures needed to support the transition to a green economy may prove to be too slow, and too rapid implementation may cause negative economic impacts for our clients and partners.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block;">potential</div>	<div style="border: 1px solid gray; padding: 2px; display: inline-block;">negative</div>

*The material topics are presented in descending order of the scores resulting from the materiality analysis, prioritizing those that generate a negative impact.

● Suppliers	<p>By promoting high standards of business ethics and responsibility throughout the supply chain we contribute to maintaining a healthy business climate. However, we recognize the importance of integrating social and environmental criteria into our supplier selection and evaluation process and are committed to expanding these practices to mitigate any potential negative impacts.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block;">potential</div>	<div style="border: 1px solid blue; padding: 2px; display: inline-block;">positive</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block;">negative</div>
● Economic value generated	<p>The economic value generated by our activity can bring both positive and (potentially) negative effects. Our lending policies and the provision of capital to people and companies support economic growth and job creation.</p> <p>As a leader in the Romanian banking system, we are also an important payment facilitator, providing people with a safe space to store their savings.</p> <p>Similarly, risky lending practices or high fees, as well as the rapid pace of digitization and the closure of some of the Bank's branches, can have a potentially negative impact on clients and the economy at large.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block;">potential</div>	<div style="border: 1px solid blue; padding: 2px; display: inline-block;">positive</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block;">negative</div>
● Water and marine resources	<p>The direct activity of BTFG has little impact on water and marine resources because water consumption relates only to daily office activities, while water is discharged into the public sewage system, within the legally defined standards. In terms of indirect impacts associated with the lending activity, given BT's exposures to various sectors where water consumption is high (e.g. agriculture, manufacturing), the impact is potentially highly negative. We are therefore constantly working to develop partnerships and offer products that help reduce this negative impact. One example of this is IFC's support in 2022 to help BT launch a blue finance product.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block;">potential</div>	<div style="border: 1px solid gray; padding: 2px; display: inline-block;">negative</div>

Material topic	Overview of impacts on the economy, environment, and people, including on human rights	Actual/ Potential	Positive/ Negative		
● Digitalization and cyber security	<p>Digitalization in the banking system has revolutionized access to financial services and the way we interact with our clients, generating positive effects not only for the economy but also for the environment and society at large.</p> <p>At the same time, the migration of financial services to the online environment carries many potentially negative risks. Strong information security policies contribute to a high degree of protection of personal data and the prevention of fraud and cyber-attacks.</p> <p>On the other hand, despite the strict measures we implement, some situations generate a real negative impact reflected in warnings or financial penalties issued by the authorities.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid blue; padding: 2px; display: inline-block; margin-left: 10px;">positive</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block; margin-top: 5px;">potential</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block; margin-left: 10px; margin-top: 5px;">negative</div>		On the other hand, potential negative impacts may arise as certain categories and groups of people do not have access to financial services (low-income, isolated rural communities), and this may contribute to perpetuating inequalities and limiting the opportunities that they can access.	
● Business ethics and responsibility		<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid blue; padding: 2px; display: inline-block; margin-left: 10px;">positive</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block; margin-top: 5px;">potential</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block; margin-left: 10px; margin-top: 5px;">negative</div>		<p>We maintain high standards of business ethics and responsibility, and our efforts are focused on training employees and promoting these principles to all business partners.</p> <p>Despite these efforts, there are situations where potential negative impacts may arise as a result of involuntary violations of current regulations.</p>	
● Our employees	<p>Our human resources policies focus on generating value for our employees by offering competitive salaries and comprehensive benefit packages, promoting a positive and inclusive culture, and developing training programmes and professional development opportunities.</p> <p>However, we recognize that there are areas where we can improve and we are working to update our policies, constantly integrating feedback from colleagues into our internal procedures and thereby reducing the potential negative impact on them and the risks we are exposed to.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid blue; padding: 2px; display: inline-block; margin-left: 10px;">positive</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block; margin-top: 5px;">potential</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block; margin-left: 10px; margin-top: 5px;">negative</div>		<p>The products and services integrating sustainability components that we have developed and have provided to our customers contribute to the transition towards a sustainable economy.</p> <p>Whether through dedicated products or the integration of ESG criteria into lending and investment decisions, we strive each year to increase the positive impact of sustainable lending on the society and the environment.</p>	
● Sustainable financing		<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid blue; padding: 2px; display: inline-block; margin-left: 10px;">positive</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block; margin-top: 5px;">potential</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block; margin-left: 10px; margin-top: 5px;">negative</div>			
● Access to financial services, inclusion, and financial education	<p>Through policies and programmes that aim to improve access to financial services, inclusion, and financial education, we help consumers and businesses save money, invest in their future and business development, and achieve their financial goals. All of this contributes to the growth and economic development of the communities in which we operate.</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid blue; padding: 2px; display: inline-block; margin-left: 10px;">positive</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block; margin-top: 5px;">potential</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block; margin-left: 10px; margin-top: 5px;">negative</div>		<p>The community investments and projects we support with our non-governmental partners contribute to the education, training, and development of the local community.</p> <p>Whether we are talking about programmes to support entrepreneurs or investments in sport, culture, and disadvantaged communities, they have a positive impact and lead to more opportunities for the beneficiaries of these initiatives.</p>	
● Community investments		<div style="border: 1px solid red; padding: 2px; display: inline-block;">actual</div> <div style="border: 1px solid blue; padding: 2px; display: inline-block; margin-left: 10px;">positive</div> <div style="border: 1px solid orange; padding: 2px; display: inline-block; margin-top: 5px;">potential</div> <div style="border: 1px solid gray; padding: 2px; display: inline-block; margin-left: 10px; margin-top: 5px;">negative</div>			

i Further information on risk management can be found on pages 85-98 of the [Board of Directors' Report](#).

Environmental and social risk assessment for the lending activity

A Group-wide environmental and social risk management system is in place for the entire portfolio, with each transaction being assessed for environmental and social risk against the following aspects:

- List of exclusions (see Annex 2)
- The EBRD reference list (see Annex 2)
- Environmental Risk Rating List
- Checklist for projects with high environmental/social risk
- The IFC Performance Standards
- National environmental, health and safety laws and regulations in force

The exclusion list identifies sectors that are not eligible for financing, regardless of the company's financial performance. Also, the tobacco and alcohol production and trade sectors are eligible for financing provided that the maximum exposure per sector does not exceed 1% of the value of the entire portfolio. The list of exclusions is updated periodically, with no additions in 2023, but it is important to note that coal mining and coal energy production are also activities in which the Bank does not engage due to its commitments to international financiers and its sustainability strategy.

The Bank complies with the European Banking Authority's requirements on the integration of environmental, social, and corporate governance risks into the lending process (e.g. The Guidelines on loan origination and monitoring, which introduced as early as 2021 the obligation to include environmental, social, and corporate governance factors in the credit and risk analysis of clients). Environmental, social and corporate governance (ESG) risk assessment forms have been

developed to analyse non-financial risks related to the exposure (availability of an environmental management system, resource efficiency, employee protection and compliance with occupational health and safety standards, biodiversity neutrality, independence of the company's management body, implementation of internal warning mechanisms, etc.) depending on the client's business category and taking into account the proposed exposure per client. The forms were developed based on IFC/EBRD environmental and social performance standards, following the principle of proportionality and taking into account good practice in the field. Once these forms have been completed by the client, a risk level is established which can be adjusted (up or down) by the Environmental and Social Risk Analyst team at Head Office, based on professional expertise and taking into account aspects not covered by the specific forms. The resulting environmental and social score was updated in 2024 to include corporate governance aspects, resulting in an ESG score (previously the governance risk analysis was done distinctly). The ESG score is taken into account in the lending decision, as the credit committees are informed of both the financial standing of the clients and the non-financial aspects with potential financial impact on the company. It should also be noted that the team of environmental and social analysts monitors exposure from a non-financial risk perspective, both at the time of lending and subsequently during the lending period, including through on-site visits.

From a credit risk management perspective, the analysis of sustainable transactions does not differ significantly from that of other transactions. The specificity lies in the assessment of the fulfillment of specific eligibility criteria in addition to the usual credit risk aspects (financial standing, business risk, market, collateral, etc.). The risk of greenwashing is also mitigated through strict monitoring of the destination of the funds and subsequent monitoring of the projects. The Risk Management department has expertise in analyzing this type of transaction (specialized energy risk analysts and sustainable financing coordinator). In 2023, financial models for assessing renewable energy projects have been updated and compliance with specific legislation has been ensured to promptly assess any negative impact on the financing portfolio.

The Bank's environmental and social risk analysis, in line with IFC/EBRD standards, also excludes from financing investments in protected areas or areas that could potentially have a negative impact on the environment or communities, as well as on protected plant or bird species living in these areas. Thus, Banca Transilvania, through its team of specialists in the head office, is constantly informed about the areas declared as natural reserves, protected areas, national parks, etc. according to NATURA 2000, and thus ensures that no projects/works are financed or real estate/land is taken as a guarantee in these areas.

In 2022 we began incorporating corporate governance risk into the environmental and social risk analysis to generate an ESG score, a process completed in 2023.

Updates in the ESG analysis process

(prior to granting decision)

In 2023, the ESG analysis was enhanced to make the process more efficient.

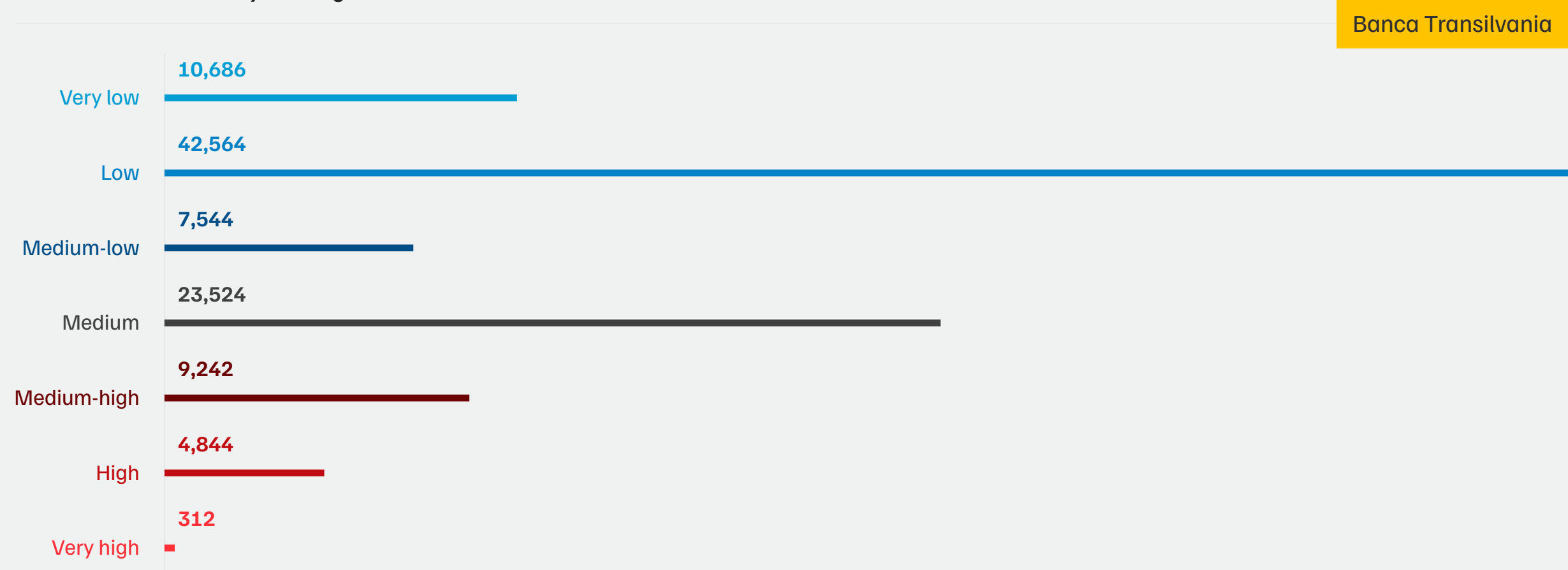
The main changes introduced are:

- Transition from 3-grade risk (low-medium-high) to 7-grade risk (very low - very high). This change helps the risk analyst determine much more clearly the impact an activity has on the environment and neighboring communities.
- Introduction of default risk grades for ESG factors: based on an internal tool, each NACE code now has an associated default risk grade for environmental, climate, transition, social, and governance risks. Furthermore, to determine the implicit climate and transition risks, the location (county) where the activity takes place is also taken into account (meeting the 2022 target for climate change tool integration).
- Streamlining the ESG Risk Opinion process by automating the completion of various fields in the loan origination application. Information such as implicit risks is automatically translated into the ESG analysis and can be modified by the ESG risk analyst drafting the opinion, based on the information submitted by the client in the completed form. A new field has also been introduced for other relevant documents submitted by the client, thus providing the option to keep a clear record of such documents.
- Adding a field to describe the client's business, providing relevant details of the client's business model. This information can be added by the staff preparing the ESG analysis, or taken from the loan origination application if available.

In addition, improvements have been made to the monitoring of ESG conditions and the integration of ESG criteria into the EWS (Early Warning System) to ensure control of compliance with the conditions set out in the ESG review process or the review of the classification of excluded activities, and to verify whether the client has had any work-related or environmental accidents.

Client type	Total no. of clients at Dec. 31 2023	Total no. of clients assessed in 2023	Combined number of ESG analyses and exclusion warnings	% of total corporate clients	No. of very low-risks loans	No. of low-risks loans	No. of medium-low risks loans	No of medium high-risks loans	No. of medium risks loans	No. of high-risks loans	No. of very high-risks loans	Total no. of facilities by business lines
Large Corporate Clients	448	343	377	84.15%	453	3,178	325	442	699	409	29	5,535
Medium Corporate clients	4,049	2,634	4,334	107.04%*	1,304	5,991	994	2,354	2,550	1,604	97	14,903
SME clients	10,676	5,734	4,544	42.56%	1,365	9,971	1,601	6,398	2,525	1,281	97	23,247
Micro Business Clients	35,425	15,178	7,294	20.59%	7,564	23,424	4,624	14,330	3,468	1,550	89	55,130
Total	50,598	23,889	16,554	32.72%	10,686	42,564	7,544	23,524	9,242	4,844	312	98,815

Total number of loans by risk degree



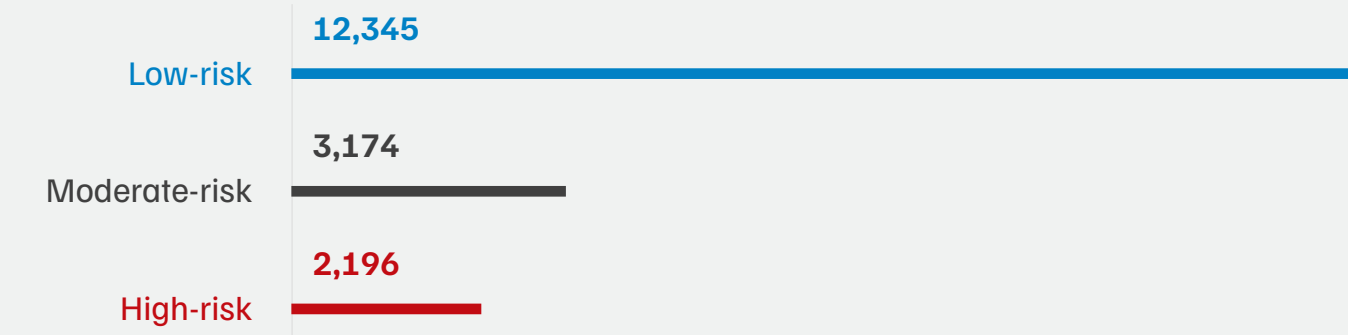
*Percentage exceeds 100% as there may be clients that go through both ESG analysis and the process of obtaining an Excluded Business Opinion.

Salt Bank

Total number of loans by risk degree

Salt Bank

Client type	Total no. of loans at Dec. 31 2023	% of total corporate clients	No. of low-risk loans	No. of moderate-risk loans	No. of high-risk loans
Micro Business Clients	7,024	40	4,267	1,564	1,193
SME clients	8,984	51	6,836	1,214	934
Medium Corporate Clients	1,577	9	1,136	374	67
Large Corporate Clients	130	1	106	22	2
Total	17,715	100	12,345	3,174	2,196

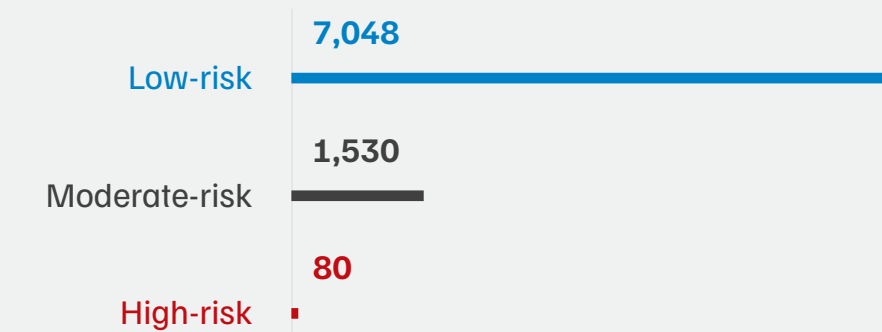


BT Mic

Number of loans by risk degree

BT Mic

Client type	Total no. of loans at Dec. 31 2023	Combined number of environmental and social warnings and exclusions	% of total corporate clients	No. of low-risk loans	No. of moderate-risk loans	No. of high-risk loans
Micro Business Clients	8,658	8,658	100	7,048	1,530	80



- Starting the process of assessing alignment with the EU Taxonomy for certain project categories and identifying overlaps with the current environmental and social risk analysis;
- Assessment of additional reporting requirements from a risk management perspective under EBA Pillar 3 Disclosures.

When making investment decisions for funds managed by BT Asset Management, sustainability risk is managed as follows:

- **at sector level** - based on indicators available from data providers
- **at the issuer level** - according to the methodology described next

The management company employs a combination of quantitative and qualitative tools to analyze and monitor the listed issuers within the managed funds' portfolios. The following indicators may be used for this purpose: indicators tracking issuer's transparency, or negative externalities of issuers, as well as composite indicators assessing the aggregate performance of issuers.

BT Asset Management conducts its own analysis of the financial instruments in the portfolios of managed funds, which may be influenced by environmental, social, or governance events. This analysis takes into account the investment policy, the profile of each fund, the average exposure per issuer, the direct concentration on equity/bond issuers, and the concentration of issuers by (sub)sectors of activity.

The implementation of ESG analysis within **Victoriabank's** corporate lending process is currently being developed. An internal working group has been set up, comprising representatives of various departments. The sustainability policy also incorporates an Exclusion List of activities that, directly or indirectly, will not be financed by the Bank. This list includes activities with a high environmental and social risk. The Exclusion list was created based on the European Bank for Reconstruction and Development (EBRD) Performance Standards and the Banca Transilvania Financial Group model. The BTFG's ESG team assisted in developing the necessary forms for the ESG Analysis.

Currently, under the internal rules, corporate clients are assigned an environmental impact risk category, which is indicated in the credit documentation (where applicable). The environmental risk category is determined according to the business line and not based on an analysis of the client's specific situation (mitigating factors, green investments, sustainability projects, etc.).

Portfolio distribution by risk class

Physical and transition climate risk

The bank has developed an application, the Climate Heat Map, which assigns each client a default climate risk based on the characteristics of the area in which it operates and the sector of activity. This application has been integrated into the loan origination application.

In the environmental, social, and corporate governance risk analysis process, which also includes climate risk analysis, a final climate risk level is established based on the inherent risk in the sector/area, with adjustments made according to management's approach to the identified risks. Climate and transition risk is assessed using the information presented either in the forms provided by the client or from other sources. Based on the information, the ESG analyst prepares the ESG risk opinion and may adjust the default risk level. This is then taken into account further in the lending process (for example, the risk inherent to the agriculture sector in drought-affected areas is high, but if investments have been made to adapt to climate change, the final climate risk may be lower).

To assign a default risk level for climate risk, factors such as rainfall (flood risk), wind speed, temperature (drought risk), and seismic risk are considered, and to assign a default risk level for transition risks, factors such as reputational risk, legislative risk, CO₂ emissions, market risk, and technological risk are taken into account.

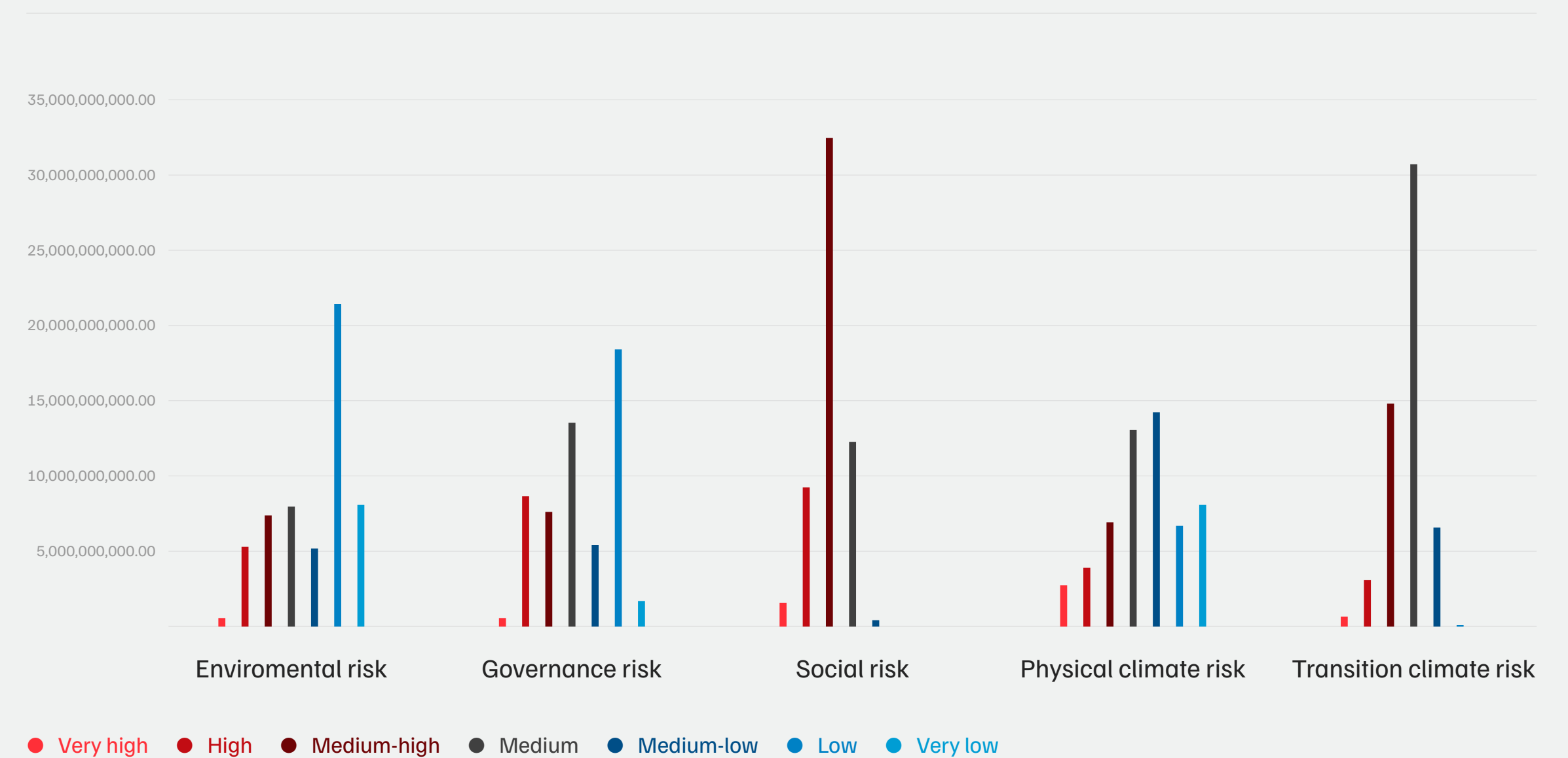
In addition, we have initiated a review of its financing practices to ensure alignment with the EU Taxonomy (EU Regulation 852/2020), with analysis of the impact of climate risk on the company being a key requirement for certain sectors. This is in accordance with the criteria of no significant harm to EU climate objectives, or DNSH/do no significant harm, adaptation objective.

Risk determination

Each NACE code is assigned a default risk rating for all types of risk that are part of ESG Risk (environmental, climate, transition, social, and governance risks). The risk assessment is conducted by determining a risk grade (seven risk grades, from very low to

very high), based on a double materiality analysis. This considers both the impact of the client's activity on the environment and society and the impact of climate phenomena and population on the business.

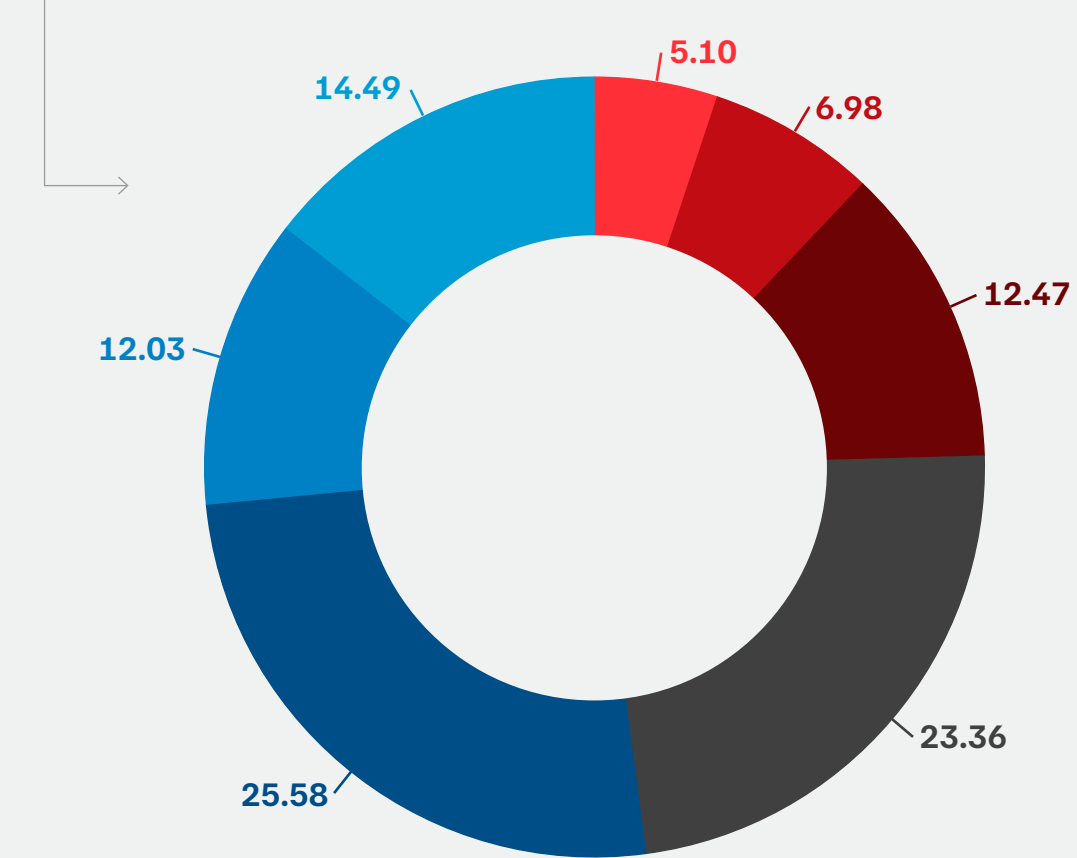
Graphical representation of ESG risk (environmental risk, climate risk, transition risk, social risk, and governance risk) by degree of risk



Default ESG risk by exposure per industry sector

Sector/ Physical climate risk	Very high	High	Medium-high	Medium	Medium-low	Low	Very low	Total
	%	%	%	%	%	%	%	%
A - Agriculture, forestry, and fisheries	22.59	38.45	20.95	9.07	8.05	0.82	0.06	100.00
B - Extractive industry	2.67	24.37	28.16	28.53	14.28	0.65	1.35	100.00
C - Manufacturing industry	0.06	0.72	18.56	34.01	31.33	14.72	0.60	100.00
D - Electricity, gas, steam, and air conditioning supply	52.94	5.99	25.13	15.62	0.01	0.32	0.01	100.00
E - Water distribution; sanitation, waste management, decontamination activities	-	0.04	11.16	28.18	28.58	31.74	0.31	100.00
F - Construction	0.01	3.29	26.34	20.33	33.21	11.08	5.74	100.00
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1.25	2.52	2.48	34.30	33.72	19.37	6.35	100.00
H - Transport and storage services	0.03	7.22	16.27	60.94	10.09	4.19	1.25	100.00
I - Accommodation and restaurant services	0.03	20.96	24.48	33.41	15.93	2.76	2.44	100.00
J - Information and communication	-	0.02	0.04	1.15	60.49	6.50	31.81	100.00
K - Financial intermediation and insurance	-	0.52	0.01	0.00	27.25	1.16	71.06	100.00
L - Real estate activities	0.00	0.34	0.36	0.73	34.21	22.51	41.86	100.00
M - Professional, scientific, and technical activities	-	0.80	0.30	3.94	42.01	22.48	30.46	100.00

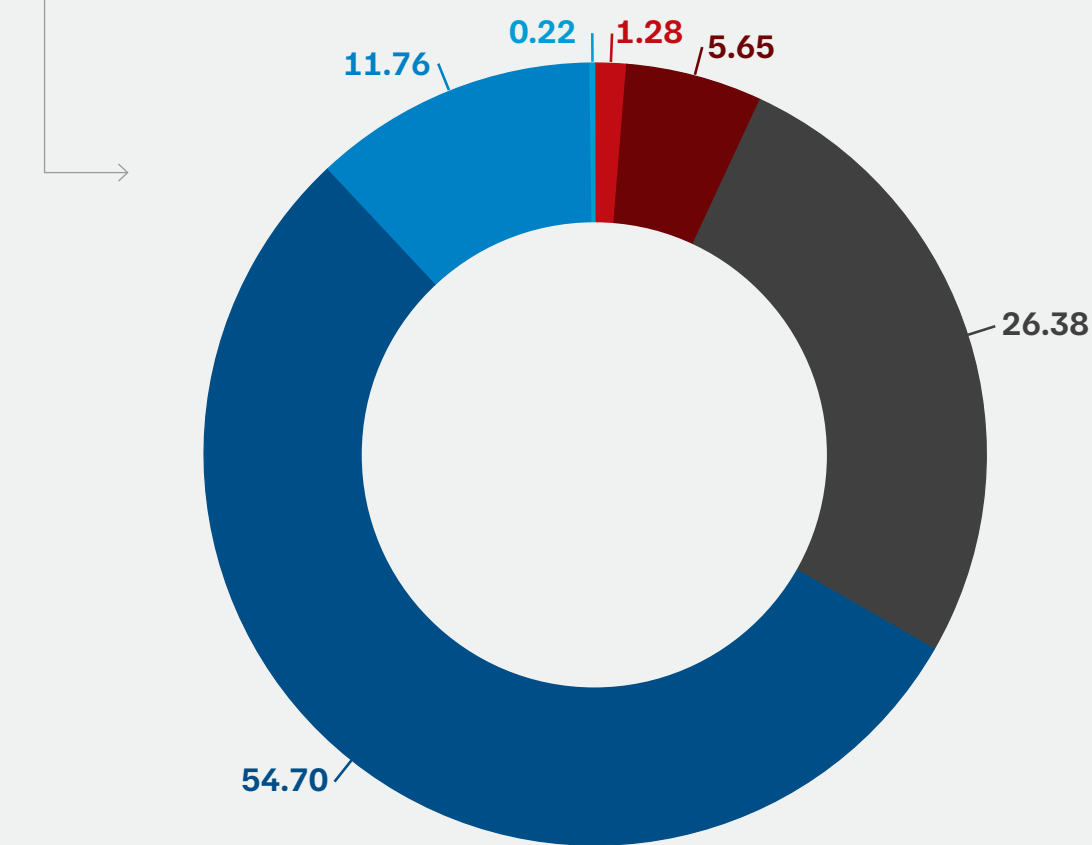
N - Administrative services and support activities	-	0.26	16.91	4.96	27.69	18.56	31.62	100.00
O - Public administration and defense; compulsory social security	-	0.02	0.01	0.01	11.16	40.86	47.94	100.00
P - Education	-	-	0.51	6.96	23.53	29.72	39.28	100.00
Q - Human health and social work activities	-	43.20	26.81	21.92	7.87	0.06	0.15	100.00
R - Arts, entertainment, and recreational activities	-	0.02	0.12	0.83	22.62	10.03	66.37	100.00
S - Other service activities	0.09	0.07	8.32	9.46	23.48	18.18	40.39	100.00
Total (%)	5.10	6.98	12.47	23.36	25.58	12.03	14.49	100.00



Default ESG risk by exposure per industry sector

Sector/ Transition climate risk	Very high	High	Medium-high	Medium	Medium-low	Low	Very low	Total
	%	%	%	%	%	%	%	%
A - Agriculture, forestry, and fisheries	-	0.03	1.93	0.60	94.71	2.73	0.01	100.00
B - Extractive industry	-	-	0.82	94.76	4.07	0.36	0.00	100.00
C - Manufacturing industry	-	7.11	15.58	31.21	44.59	1.45	0.06	100.00
D - Electricity, gas, steam, and air conditioning supply	-	0.07	0.01	99.59	0.32	0.01	-	100.00
E - Water distribution; sanitation, waste management, decontamination activities	-	0.18	0.18	91.99	5.20	2.45	-	100.00
F - Construction	-	0.06	23.85	57.45	17.12	1.51	0.01	100.00
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	0.95	0.42	2.56	93.89	2.08	0.10	100.00
H - Transport and storage services	-	0.00	3.57	66.90	3.78	25.55	0.19	100.00
I - Accommodation and restaurant services	-	0.01	0.50	1.45	41.57	56.38	0.10	100.00
J - Information and communication	-	-	0.00	0.76	43.21	56.02	0.01	100.00
K - Financial intermediation and insurance	-	-	0.00	-	98.32	1.67	-	100.00
L - Real estate activities	-	0.02	0.06	8.69	1.72	89.48	0.03	100.00
M - Professional, scientific, and technical activities	-	-	0.13	2.84	4.46	92.33	0.23	100.00

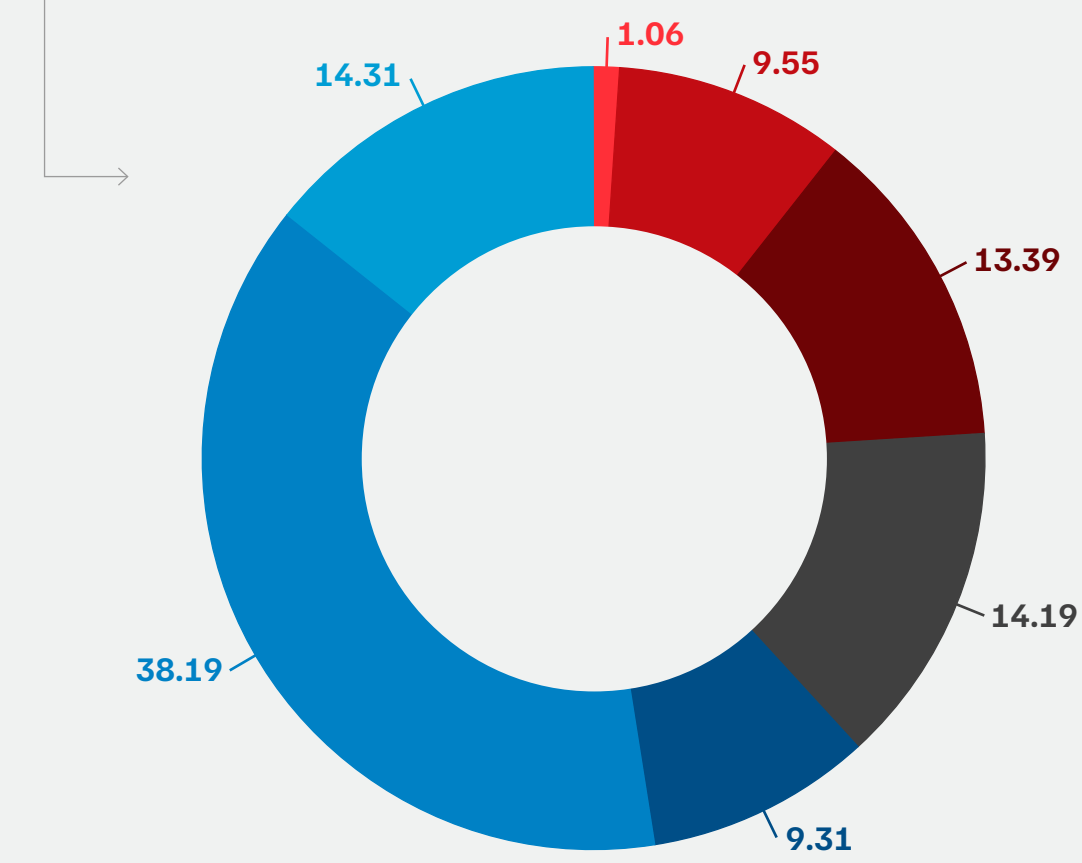
N - Administrative services and support activities	-	0.02	1.88	1.58	37.45	44.82	14.24	100.00
O - Public administration and defense; compulsory social security	-	-	-	99.97	-	0.03	-	100.00
P - Education	-	-	0.13	5.66	88.22	5.50	0.49	100.00
Q - Human health and social work activities	-	-	0.00	-	99.80	0.20	-	100.00
R - Arts, entertainment, and recreational activities	-	-	0.02	1.99	8.84	89.11	0.04	100.00
S - Other service activities	-	-	-	0.28	20.93	78.68	0.11	100.00
Total (%)	-	1.28	5.65	26.38	54.70	11.76	0.22	100.00



Environmental risk

Sector	Very high	High	Medium-high	Medium	Medium-low	Low	Very low	Total
	%	%	%	%	%	%	%	%
A - Agriculture, forestry, and fisheries	-	2.51	10.46	9.96	77.08	-	-	100.00
B - Extractive industry	97.44	2.56	-	-	-	-	-	100.00
C - Manufacturing industry	5.59	11.93	47.20	35.11	0.17	-	0.00	100.00
D - Electricity, gas, steam, and air conditioning supply	-	43.21	0.15	-	56.64	-	-	100.00
E - Water distribution; sanitation, waste management, decontamination activities	7.57	88.14	4.28	-	-	-	-	100.00
F - Construction	-	21.00	39.50	7.32	-	7.77	24.42	100.00
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	4.48	3.82	1.24	0.82	89.64	-	100.00
H - Transport and storage services	-	13.10	-	72.20	-	14.70	-	100.00
I - Accommodation and restaurant services	-	-	-	92.66	-	7.34	-	100.00
J - Information and communication	-	-	-	-	-	29.19	70.81	100.00
K - Financial intermediation and insurance	-	-	-	-	-	58.75	41.25	100.00
L - Real estate activities	-	-	-	-	-	-	100.00	100.00
M - Professional, scientific, and technical activities	-	-	-	7.20	-	2.32	90.48	100.00

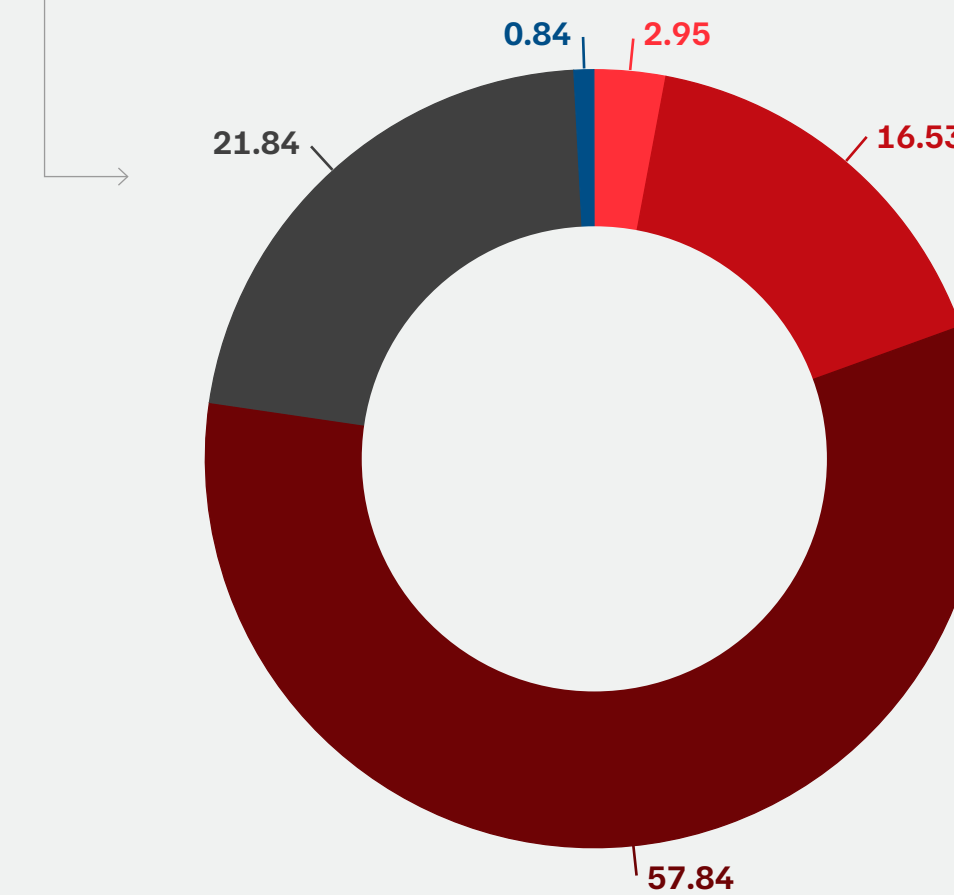
N - Administrative services and support activities	-	-	-	3.23	-	48.06	48.71	100.00
O - Public administration and defense; compulsory social security	-	-	-	-	-	96.29	3.71	100.00
P - Education	-	-	-	-	-	100.00	-	100.00
Q - Human health and social work activities	-	-	-	5.11	-	94.89	-	100.00
R - Arts, entertainment, and recreational activities	-	-	-	-	-	92.10	7.90	100.00
S - Other service activities	-	-	-	13.29	-	61.42	25.28	100.00
Total (%)	1.06	9.55	13.39	14.19	9.31	38.19	14.31	100.00



Governance risk

Sector	Very high	High	Medium-high	Medium	Medium-low	Low	Very low	Total
	%	%	%	%	%	%	%	%
A - Agriculture, forestry, and fisheries	-	1.98	75.59	22.43	-	-	-	100.00
B - Extractive industry	-	2.56	-	97.44	-	-	-	100.00
C - Manufacturing industry	-	12.84	31.64	55.52	-	-	-	100.00
D - Electricity, gas, steam, and air conditioning supply	-	-	100.00	-	-	-	-	100.00
E - Water distribution; sanitation, waste management, decontamination activities	-	0.04	99.96	-	-	-	-	100.00
F - Construction	24.42	31.91	43.67	-	-	-	-	100.00
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	24.34	58.29	14.56	2.81	-	-	100.00
H - Transport and storage services	-	3.26	87.46	9.28	-	-	-	100.00
I - Accommodation and restaurant services	-	-	4.43	95.57	-	-	-	100.00
J - Information and communication	-	-	94.60	5.40	-	-	-	100.00
K - Financial intermediation and insurance	-	-	100.00	-	-	-	-	100.00
L - Real estate activities	-	100.00	-	-	-	-	-	100.00
M - Professional, scientific, and technical activities	-	-	-	89.71	10.29	-	-	100.00

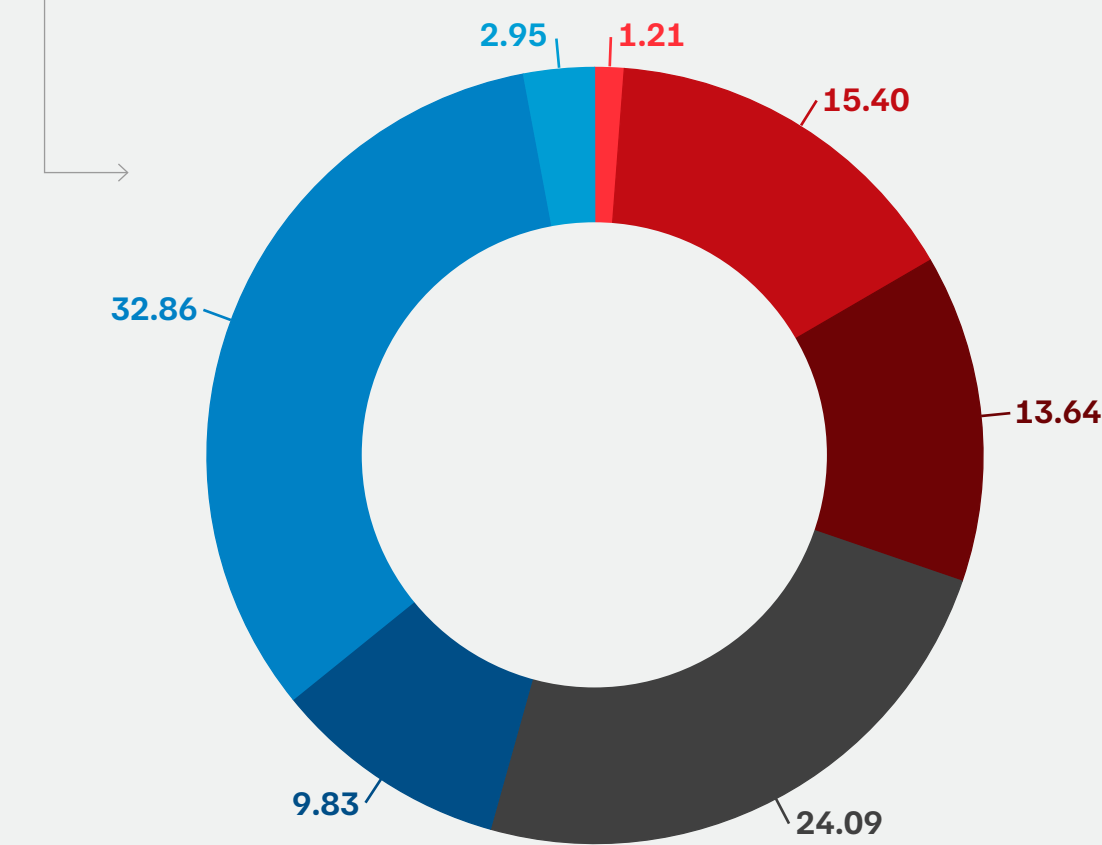
N - Administrative services and support activities	-	-	32.08	67.92	-	-	-	100.00
O - Public administration and defense; compulsory social security	-	-	-	100.00	-	-	-	100.00
P - Education	-	-	100.00	-	-	-	-	100.00
Q - Human health and social work activities	-	-	100.00	-	-	-	-	100.00
R - Arts, entertainment, and recreational activities	-	1.73	90.37	7.90	-	-	-	100.00
S - Other service activities	-	-	25.28	74.72	-	-	-	100.00
Total (%)	2.95	16.53	57.84	21.84	0.84	-	-	100.00



Social risk

Sector	Very high	High	Medium-high	Medium	Medium-low	Low	Very low	Total
	%	%	%	%	%	%	%	%
A - Agriculture, forestry, and fisheries	-	2.36	95.65	0.31	1.67	-	-	100.00
B - Extractive industry	97.44	2.56	-	-	-	-	-	100.00
C - Manufacturing industry	6.53	31.40	25.42	30.00	6.50	0.15	-	100.00
D - Electricity, gas, steam, and air conditioning supply	-	27.09	16.27	-	-	56.64	-	100.00
E - Water distribution; sanitation, waste management, decontamination activities	7.57	88.14	4.28	-	-	-	-	100.00
F - Construction	-	60.50	5.37	9.72	-	-	24.42	100.00
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	3.80	4.64	40.01	17.70	33.85	-	100.00
H - Transport and storage services	-	-	-	43.35	56.65	-	-	100.00
I - Accommodation and restaurant services	-	-	-	93.17	6.83	-	-	100.00
J - Information and communication	-	-	-	-	-	100.00	-	100.00
K - Financial intermediation and insurance	-	-	-	-	-	100.00	-	100.00
L - Real estate activities	-	-	-	-	-	100.00	-	100.00
M - Professional, scientific, and technical activities	-	-	-	7.20	-	92.80	-	100.00

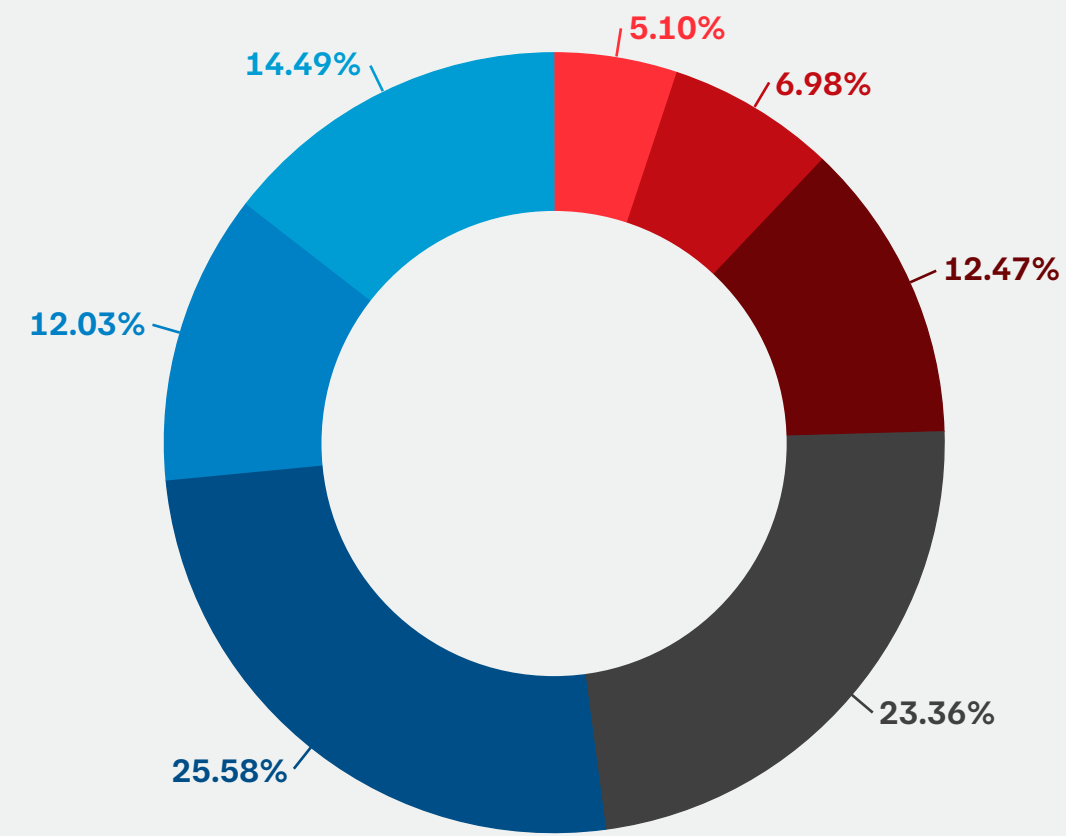
N - Administrative services and support activities	-	-	-	20.97	7.07	71.96	-	100.00
O - Public administration and defense; compulsory social security	0.04	-	0.00	0.05	-	99.91	-	100.00
P - Education	-	-	-	13.72	0.96	85.32	-	100.00
Q - Human health and social work activities	-	5.11	-	90.06	4.83	-	-	100.00
R - Arts, entertainment, and recreational activities	1.73	-	-	-	34.27	64.00	-	100.00
S - Other service activities	-	-	-	11.17	63.54	25.28	-	100.00
Total (%)	1.21	15.40	13.64	24.09	9.83	32.86	2.95	100.00



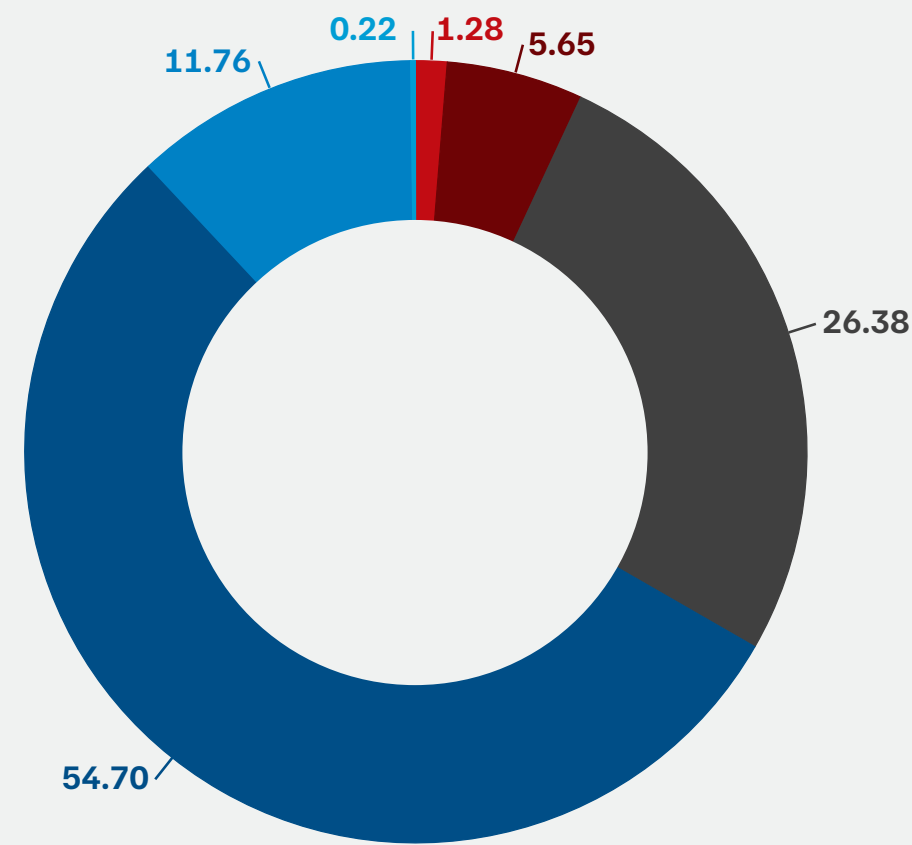
The analysis was carried out for 100% of exposures by legal entities.

Default ESG risk by exposure per industry sector

Sector/ Physical climate risk

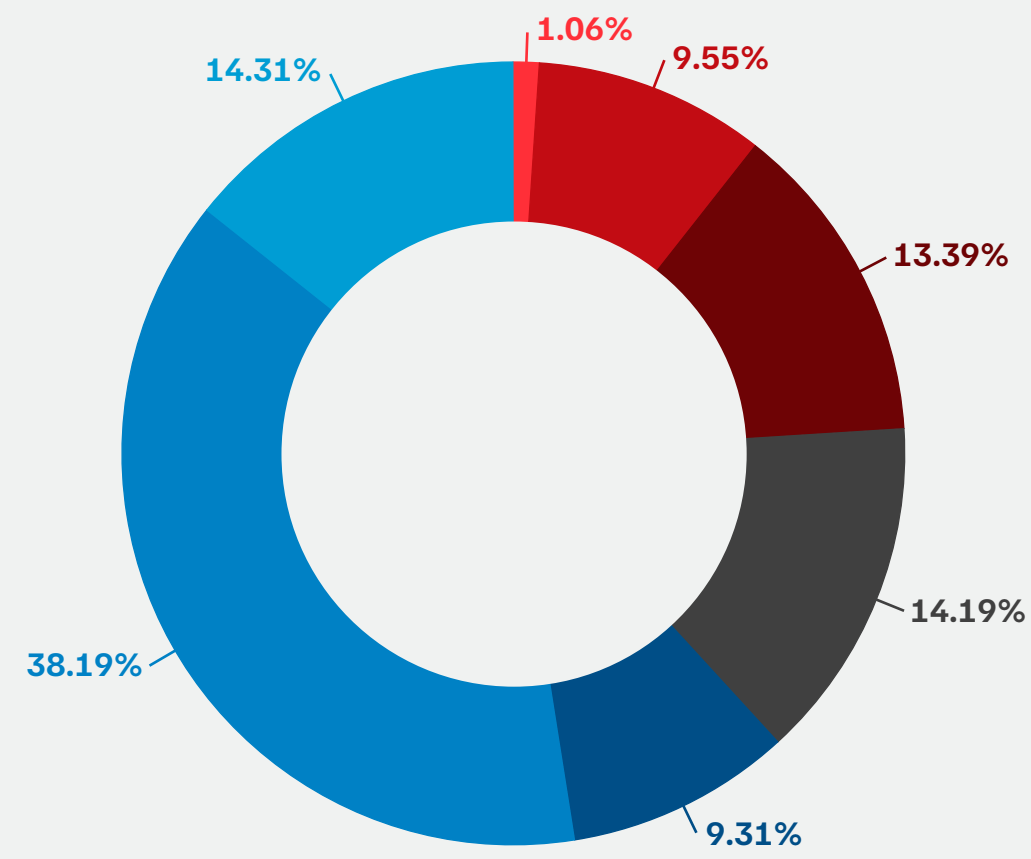


Sector/ Transition climate risk

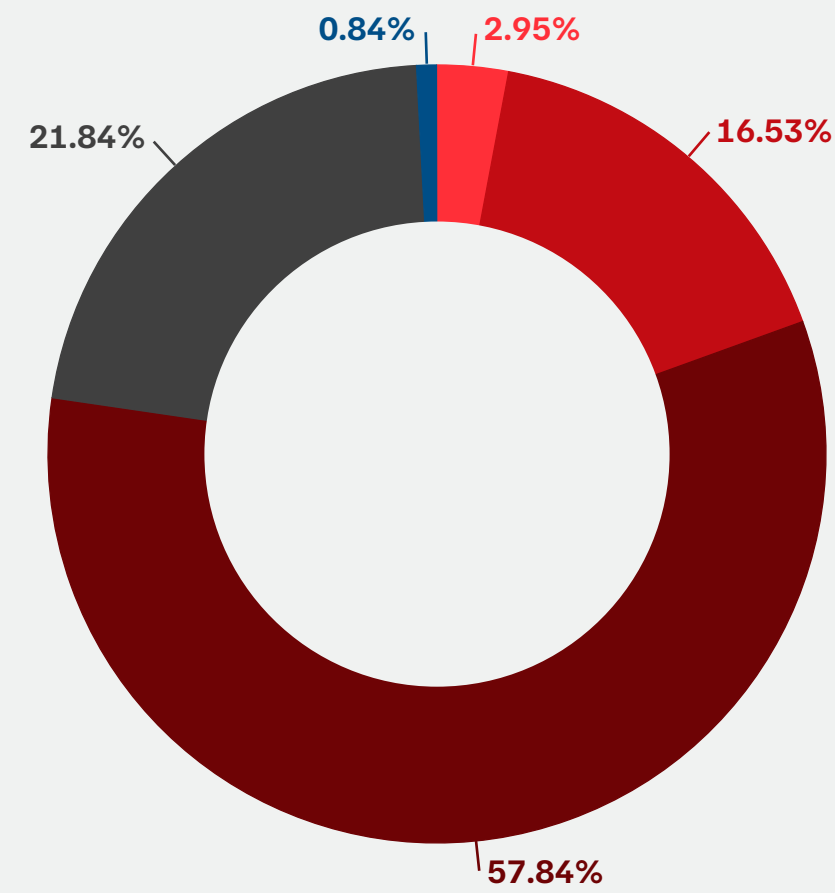


- Very high
- High
- Medium-high
- Medium
- Medium-low
- Low
- Very low

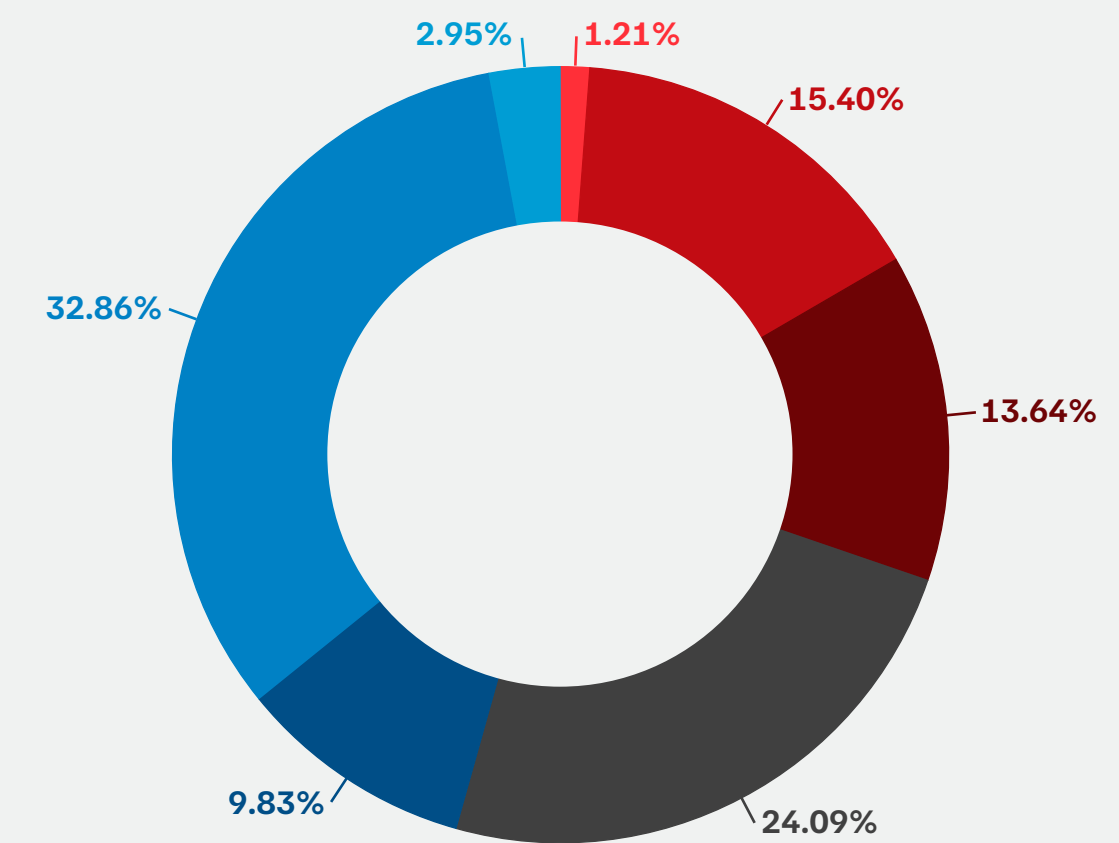
Environmental risk



Governance risk



Social risk





BT

4

Impact generated by BTFG's activity

4.1 Environmental impact

- 4.1.1 Our portfolio and financed emissions
- 4.1.2 Carbon footprint reduction
- 4.1.3 Energy consumption
- 4.1.4 Resource use

4.2 Social impact and responsible banking

- 4.2.1 Access to financial services, inclusion, and financial education
- 4.2.2 Social impact financing
- 4.2.3 Responsible employer
- 4.2.4 Diversity and inclusion
- 4.2.5 Community investment

4.3 Business ethics and responsibility

- 4.3.1 Ethics and Code of Conduct
- 4.3.2 Anti-corruption and anti-bribery measures
- 4.3.3 Data protection and cyber security
- 4.3.4 Business continuity
- 4.3.5 Supplier engagement



4.1 Environmental impact

The banking system has a direct impact on the environment through its own operations and activities. This impact is generated by the energy used to heat, cool, and light buildings, along with the intensive use of infrastructure required to run digital systems and applications. Although there is a clear trend towards digitalization, the use of paper still remains an impact element, derived from traditional banking practices involving the physical documentation of various operations.

Indirectly, banks have a significant environmental impact through the financial services they provide, particularly in the areas of lending, investment, and procurement policies. By providing capital for a wide range of industries and projects, the banking system has the power to support sectors that either contribute negatively to the environment or generate solutions that can reduce this impact.

BTFG is committed to implementing environmentally responsible practices and strives to minimize negative environmental impacts throughout the life cycle of its services.

Reducing the carbon footprint is achieved through careful management of energy consumption, use of renewable sources, efficient use of water, and use of the most efficient materials, with the objective of minimizing waste generation.

Supply chain management, sustainable procurement of materials and services, and energy efficiency, all contribute to reducing the carbon footprint and negative environmental impact.

4.1.1 Our portfolio and financed emissions

In the financial sector, every investment or lending decision carries environmental consequences, which are often negative.

As the largest financier of the Romanian economy, we have an enormous responsibility to promote the transition to an economy where projects that have a positive environmental or social impact or contribute to a significant reduction of negative effects are at the top of the priorities for the Romanian financial ecosystem.

Across the entire BTFG group, we are committed to providing comprehensive support to the local business environment on this journey. We are constantly seeking and developing solutions that will align our portfolio with national and European environmental objectives. In all this effort, we believe that beyond our role as a financier, we must stand by our clients through close collaborations that facilitate the transfer of know-how and improve their knowledge of the benefits of sustainable financing.

Portfolio overview in 2023

Our Sustainable Finance Action Plan is based on a full understanding of our portfolio distribution and the environmental implications of our lending policy.

Sector	Banca Transilvania	BT Financial Group
	% of the total in 2023	% of the total in 2023
A - Agriculture, forestry, and fisheries	4.87%	5.12%
B - Extractive industry	0.10%	0.13%
C - Manufacturing industry	6.30%	6.77%
D - Electricity, gas, steam, and air conditioning supply	2.55%	2.46%
E - Water distribution; sanitation, waste management, decontamination activities	0.37%	0.46%
F - Construction	4.10%	4.90%
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	10.27%	11.51%
H - Transport and storage services	3.09%	4.34%
I - Accommodation and restaurant services	1.52%	1.73%
J - Information and communication	0.44%	0.64%
K - Financial intermediation and insurance	5.93%	0.86%

L - Real estate activities	2.56%	2.43%
M - Professional, scientific, and technical activities	0.78%	1.19%
N - Administrative services and support activities	0.56%	0.83%
O - Public administration and defense; compulsory social security	12.29%	11.62%
P - Education	0.08%	0.14%
Q - Human health and social work activities	2.31%	2.37%
R - Arts, entertainment, and recreational activities	0.55%	0.60%
S - Other service activities	0.16%	0.28%
Private Individuals	41.17%	41.59%
Total	100%	100%

Note: non-recourse factoring amounts are also included

i Detailed information on BTFG's financial indicators, portfolio, products, and subsidiary activity in 2023 can be found in the [Board of Directors' Report](#).

Sustainable financing

In 2023, BTFG developed and published the [Sustainable Finance Framework](#), which enables it to issue sustainable 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 alleviate social problems.

By issuing sustainable financing instruments, BTFG will provide additional transparency on funded projects that bring social and environmental benefits. This will encourage further investment in sustainable environmental and social projects that will contribute to achieving the goals of the Paris Climate Agreement and the UN Sustainable Development Goals (SDGs).

In addition, sustainable financing instruments will help diversify Banca Transilvania's investor base, broaden the dialogue with existing investors, and contribute to the development of the sustainable financing market. The sustainable finance framework is supported by an [external opinion](#) issued by Sustainalytics.

In November 2023, BT issued its first sustainability bonds, based on the principles set out in the Sustainable Finance Framework.

Banca Transilvania successfully attracted €500 million through a bond issue on November 29.

The issue was oversubscribed in just a few hours, resulting in a reduction in the interest rate from 7.75% at the start of the order placement to 7.25% by the end. This is the first bond issue with an ESG label, including a social component (minimum 50%) and a green component, and is listed on the Dublin Stock Exchange. The bonds are MREL, contributing to an optimal level of MREL-eligible funds, separate from client deposits, which are guaranteed by the Bank Deposit Guarantee Fund in accordance with European standards.

This was Banca Transilvania's first ESG-labelled bond issue with a social component (minimum 50%) and a green component. An amount equal to the proceeds of the Sustainable Finance Instruments issued by Banca Transilvania will be used to finance and/or refinance a portfolio of eligible loans, as defined by the eligibility criteria.

In line with Banca Transilvania's sustainability strategy, the Eligibility Criteria listed in the Sustainable Finance Framework can directly contribute to the achievement of the UN SDGs and the EU Environmental Goals.

Eligible green loan categories are:

- **green buildings**
- **renewable energy**
- **clean transport**
- **organic agriculture**

On the other hand, eligible social loan categories include:

- job creation and programmes designed to prevent and/or mitigate unemployment caused by socio-economic crises, climate transition projects, and/or other "fair transition " considerations (including through the potential effect of SME finance and microfinance)
- access to healthcare
- access to education

The definition of social finance will allow the Bank to identify this portfolio separately in the Bank's systems and to monitor and report on the community impact of such financing (the first reporting will be done as part of the Sustainability Bond Allocation Report). Blue finance, as defined by the IFC methodology, is also included in the category of sustainable finance, i.e. mainly financing for water efficiency and water pollution reduction.

The bank has set a target of RON 3.5 billion in green loans by the end of 2025 (green loan ratio - 5% of the value of the corporate portfolio), with the level of lending in 2023 creating the conditions for achieving this target: **RON 1 billion of new green financing in 2023.**

Regarding the local subsidiary's leasing activities, a target has been set to finance 25% of the total vehicle portfolio to purchase electric and hybrid cars from 2024. This portfolio is managed by the Green Loans and Sustainable Finance department, and the relevant expertise is available in the Risk Management department, with sustainable finance risk analysis performed by risk analysts specializing in energy/sustainable finance.

Throughout this chapter, the term green loans is used to describe the loans that qualify as green, according to the Bank's assessment based on CAFI tool criteria.

Green loans granted in 2023

Within BT there is a **Green and Sustainable Lending Department***, specifically created to coordinate and market sustainable lending activity.

The department's activities include:

- identifying sectors/industries, clients, programmes, and funding opportunities
- developing sustainable lending structures, flows, and rules;
- transfer know-how to the network and business lines;
- flexible translation of European/national regulations/guidelines into rules;
- organizing campaigns and events to promote specific products, producing information and materials.

The Sustainable Finance Guidelines** set out the loan terms and the 8 categories of green and blue loans:

1. Renewable energy loan RE (dedicated to financing the production of energy from renewable resources - wind, solar - photovoltaic panels, biomass, biogas);
2. EE Energy efficiency investment loan;
3. Loans for green transport (electric and/or hybrid cars and vehicles, and improving energy efficiency in transport);
4. Loans to finance the construction of green buildings;
5. Loans for investments leading to increased water efficiency can be granted for the upgrading of an existing facility, a water recycling/reuse project, or a project using alternative water sources such as groundwater, desalinated water, or the implementation of advanced (tertiary) on-site wastewater treatment;
6. Loans for investments to enhance adaptation to climate change (financing aimed at reducing the vulnerability of human or natural systems to the impacts of climate change and risks related to climate variability by maintaining or enhancing the capacity to adapt to climate change);
7. Special environmental financing - loans for which the calculation of greenhouse gas reductions cannot be quantified. Examples: working capital financing for manufacturers of energy-efficient equipment; financing for suppliers or users of technologies and services that contribute to climate-smart agriculture by reducing agricultural losses or increasing productivity; financing for companies that practice environmentally certified agriculture; financing for companies that aim to recycle waste;
8. Blue financing - financing with a direct impact on aquatic ecosystems such as seas, river basins, or water resources, distribution networks or water treatment, and purification plants.

*As of 2024, it was renamed the Department of European Programmes and Green Credits.

**Under review in 2024 to include loans with a social impact.

i The types of projects eligible under each category are detailed in the Green Framework in [Annex 3](#) of this report.

To assess an investment loan's potential to qualify as green finance, Banca Transilvania uses **CAFI - Climate Assessment for Financial Institutions**, provided by the International Finance Corporation (IFC).

The platform is a tool that helps to determine the climate suitability of financed projects and to measure their development impact.

In 2022, access to the platform was granted to 59 employees who assessed the "green" potential of the funding based on information collected using specific forms. In total, 500 potentially eligible projects were registered in 2022, of which 371 were validated as green grants.

Green loans

	Amount granted million RON	No. of grants	Green loan balances million RON
<input checked="" type="checkbox"/> Non-GRI Indicator (company specific)			
2023	1.034,3	460	1.970,5
2022	789,6	371	1,208.0
2021	538,0	44	941,3

Top 3 categories for which green loans were granted:

Renewable energy production:

RON 597.7 million

Green buildings:

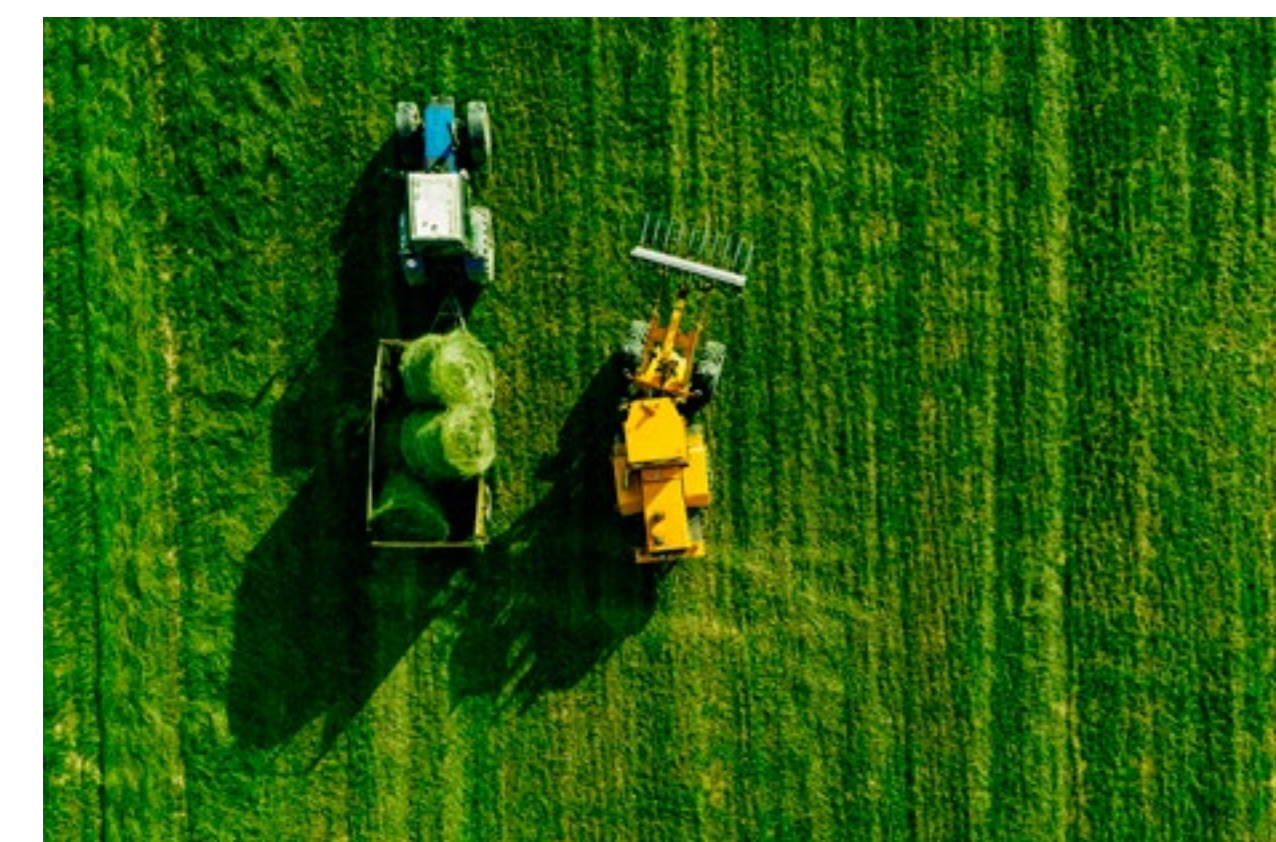
RON 231.2 million

Special environmental funding:

RON 113.3 million

including:

- equipment for the collection and recycling of waste, including from agricultural holdings,
- recovery of waste components and their reuse,
- equipment such as batteries for energy storage or grid stabilization,
- equipment for the collection of information on carbon footprint reduction.



BT events to promote green finance solutions

Beyond our role as the leading financier of the Romanian economy, we believe it is important to educate local entrepreneurs about the opportunities and benefits that access to green finance products can bring to their businesses.

Between June and September, BT hosted 3 events for local entrepreneurs in Bucharest, Cluj, and Timisoara, with over 420 participants.

Themed **Renewable energy: technical solutions and financing opportunities**, these sessions included guest panels discussing green energy production and energy efficiency solutions for businesses.

These events reinforce our commitment to supporting entrepreneurs in their transition to a more sustainable future by providing access to expertise and financial resources.

City	Topics	Target audience and objective	Event	No. of participants
Bucharest	Sustainable development.	entrepreneurs, understanding the concepts of ESG and Sustainability	Sustainable financing	170
Cluj	Renewable energy.			130
Timisoara	Technical solutions and funding opportunities.	news on green energy production and energy efficiency solutions		120



Positive environmental impact funding

Categories:

Energy production →

Green buildings

Blue finance

Energy efficiency

Special environmental funding

Energy production category

Terravis Studio

Terravis Studio SRL is part of the Renovatio Group, which has extensive experience in renewable energy production. Since 2005, the group has developed more than 2,300 MW of wind projects and more than 600 MW of photovoltaic projects, both in Romania and abroad (Colombia, Moldova, Poland, and Portugal).

Banca Transilvania financed the company with an investment loan for the development of a photovoltaic power plant with an installed capacity of 19 MWp in Dobrosloveni, Olt county.

Engie Romania

The ENGIE Romania Group is currently the largest player in the distribution and supply of natural gas in Romania, with over 2 million active customers, and is also present in the electricity supply segment.

To accelerate the transition to a sustainable economy, the company has set ambitious targets for renewable energy generation capacity, aiming to develop 500 MW of capacity by 2025 and 1 GW by 2030.

We are proud to support the company's strategy of decarbonization and alignment with the EU's climate targets by financing the Ariceștii - Rahtivani project, which consists of a solar photovoltaic park with an installed capacity of 37 MW. The park will be developed on an area of 57 ha and the estimated production is equivalent to the energy consumption of about 31,000 families.

In addition, the increased green energy production capacity will enable the company to develop products that will, in turn, support its customers' decarbonization efforts by increasing the share of renewable energy in the total energy supplied.

Haditon Group

The Haditon Group was established in 2000 and is involved in the cultivation and trading of cereals, egg production, and broiler farming. The company operates more than 1,500 ha in Argeș County, has significant storage capacities, and manages four poultry farms for eggs and meat.

Banca Transilvania financed the installation of photovoltaic panels on the buildings under the company's management (chicken farms, warehouses, buildings, silos, etc.), enabling a reduction in the energy costs consumed in the production processes.

Positive environmental impact funding

Categories:

Energy production

Green buildings →

Blue finance →

Energy efficiency

Special environmental funding

Green buildings category

Hexagon Offices

Hexagon Offices is a project company of the Kesz Construction Group, one of the largest players in the Hungarian construction sector, with an important regional position (Central and Eastern Europe), more than 40 years of experience in the field, and more than 3,000 completed projects. The Group works in the industrial, commercial, and strategic infrastructure sectors.

BT provided a green investment loan to facilitate the construction of a 21,000 m² multi-functional office building. The building has high energy efficiency standards and is BREEAM Excellent certified.

One United Properties/ One Cotroceni Park

Banca Transilvania has granted a EUR 20 million loan to property developer One United Properties. The investment loan will be used to complete the development of the One Cotroceni Park residential area in Bucharest. It comprises almost 870 apartments, as well as offices, shopping, and leisure areas with panoramic views of the Cotroceni Palace, the Botanical Garden, and the Palace of Parliament.

The residential units at One Cotroceni Park have received Green Homes pre-certification from the Romanian Green Building Council. One Cotroceni Park is the first phase of the sustainable urban development project, which will cover an area of more than 5.5 hectares.

Green buildings have several benefits for future residents, such as energy performance, renewable energy sources, environmentally friendly materials, and green spaces.

Blue finance category

TeraPlast Recycling

TeraPlast Recycling collects and recycles post-industrial and post-consumer rigid PVC from Romania and other EU member states such as the Netherlands, Italy, Germany, and Finland.

In Romania, the company is the largest consumer of recycled PVC materials and the largest recycler of rigid PVC, and in Europe, it is one of the top 5 recyclers of rigid PVC with a processing capacity of up to 31,000 tonnes per year. The Group provides mechanical recycling of post-industrial and post-consumer PVC waste from a wide range of sources including joinery profiles, pipes, fittings, blinds, cladding, window trims, and gutters.

BT provided investment loans to the company for the construction of a new plastic recycling and stretch film production facility, and the loans were classified as Blue Finance, aiming to avoid water pollution as a result of the investment financed.

Positive environmental impact funding

Categories:

Energy production

Green buildings

Blue finance

Energy efficiency →

Special environmental funding →

Energy efficiency category

Lenauheim Commune

Green loan for the implementation of a project to rehabilitate and upgrade the public lighting system in the commune of Lenauheim. The commune Lenauheim is located in the western part of Timis County, 45 km away from Timisoara, 11 km away from the nearest town Jimbolia, and close to the Serbian border.

In recent years, the commune has implemented several projects of public interest, with non-reimbursable funding: construction of sewerage systems and treatment plants, rehabilitation, modernization and equipping of the medical dispensary, rehabilitation of kindergartens, construction of a bicycle path, etc.

Special environmental funding category

Softronic

During the year, Banca Transilvania granted a loan of almost EUR 32 million to Softronic (Craiova) to modernize 19 electric locomotives to be used by CFR Călători.

BT is the main funder of Softronic, with more than 20 years of collaboration. With this new financing, Banca Transilvania contributes to the sustainability of the Romanian transport sector and Romanian private manufacturing companies.

The contract, with a total value of €100 million, was awarded through a public procurement procedure under the PNRR-funded Rolling stock modernization and procurement programme.

In Romania, Softronic is the only manufacturer of asynchronous electric locomotives and Hyperion electric multi-unit trains, with exports to Sweden, Hungary, and Bulgaria. Softronic's products contribute to the improvement of transport quality and sustainable mobility by making the transport of goods and people more efficient, while reducing negative impacts on the environment and people.

Sustainable financing for private individuals

Private individual clients can access several types of green products and services:

→ Green home loan/mortgage

a product that encourages clients to buy energy-efficient homes

→ Drive green

(BT Leasing initiative)

leasing of new or used electric or hybrid cars

→ Green Everything (Verde Tot) Campaign

focusing on promoting special offers for credit card holders at partner stores offering sustainable products

In 2023, approximately 1 of 7 mortgage/real estate loans granted will qualify as green (category A energy efficiency certificate).

While in 2022 the Bank granted RON 850 million in green real estate/ mortgage loans, in 2023 the value amounted to 827.

At the end of 2023, 7.73% of the retail loan portfolio consisted of green loans.

The value of green loans granted to private individuals

	Value RON	% of total production
as of Dec. 2023	826,641,027	9.14%
as of Dec. 2022	849,751,261	11.58%
as of Dec. 2021	1,000,983,804	13.03%

Green loan balances granted to private individuals

	Value RON	% of the total balance
as of Dec. 2023	2,221,406,549	7.73%
as of Dec. 2022	1,778,109,489	6.69%
as of Dec. 2021	1,102,999,409	4.42%

The value of green mortgage loans granted to private individuals

	Value RON	% of total mortgage production
as of Dec. 2023	826,641,027	17.68%
as of Dec. 2022	846,180,573	23.84%
as of Dec. 2021	1,000,983,804	26.88%

The value of green mortgage loans balances granted to private individuals

	Value RON	% of the total mortgage balance
as of Dec. 2023	2,218,301,129	11.91%
as of Dec. 2022	1,770,909,454	10.43%
as of Dec. 2021	1,094,661,376	7.06%

Sustainable financing through BTFG subsidiaries

Victoriabank

Victoria Bank's lending is governed internally by the Legal Entities Lending Policy. The policy aims to build a long-term partnership with the community by making investments that benefit both the business and the community at large. It is important for the bank to determine whether the projects it finances pose an environmental risk, as high risks can lead to disruption or cessation of production, reduced sales, and if the product/project is deemed harmful, additional costs for both the client and the bank.

In 2023, the Sustainability Policy was developed and adopted, focusing on describing a comprehensive process for sustainable financing of corporate clients.

At the same time, the process of implementing ESG analysis in legal entity lending has been initiated and will be referred to in the updated Legal Entity Lending Policy.

The total amount of loans granted by VB in 2023 for environmental purposes amounts to RON 31,019,000:

1. **Loans granted for photovoltaic panels**
 - 5 clients
 - totaling RON 7,255,770
2. **Loans granted for wind turbines**
 - 6 clients
 - totaling RON 13,921,722
3. **Loans granted for energy efficiency**
 - 7 clients
 - totaling RON 9,841,515

The amount of the EBRD loans granted is EUR 673,069.

Examples of funded projects:

1. **Solbun SRL**
 - credit amount RON 3,287,544
 - installation of a photovoltaic plant with a capacity of 1,305 KW
2. **Roofart SRL IM**
 - loan of RON 2,596,197
 - upgrading and optimization of equipment for the production of rainwater drainage systems (metal tiles)
3. **Nordix Prim SRL**
 - loan of RON 2,233,780
 - purchase and installation of a wind turbine
4. **Condimelectro SRL SC**
 - loan of RON 1,799,000
 - purchase and installation of photovoltaic panels with a capacity of 990 kW

At the same time, Victoriabank also holds in its portfolio EBRD-funded projects that have received a GET (Green Economy Transition) score, for example an **investment project of Sum Agro Service SRL.**

Following the project initiated in previous years, the hatchery egg production farm, reconstruction works have been carried out and equipment has been purchased for the buildings, which are equipped with a microclimate control system and water meters. These generate savings of heating agents and allow a better monitoring of the consumption, as well as loss avoidance.

Sustainable financing through BTFG subsidiaries

BT Leasing, BT Leasing Moldova, and Idea Leasing

Through our subsidiaries BT Leasing and Idea::Leasing, we support green mobility solutions by offering clients the opportunity to purchase electric or hybrid cars. Promoting green finance solutions is one of the company's strategic objectives, and we have created beneficial solutions for our clients, both individuals and businesses.

Client type	at Dec. 31 2023					
	Total no. of loans			Value of loan balance thousand RON		
	electric cars	hybrid cars	fossil fuel cars	electric cars	hybrid cars	fossil fuel cars
BT Leasing						
Private individual clients	89	217	283	8,178	16,744	12,008
Micro Business Clients	817	4,714	18,574	87,932	497,257	1,263,909
SME clients	223	1,001	4,378	29,514	159,985	453,357
Medium Corporate Clients	56	363	1,518	8,377	59,692	252,815
Large Corporate Clients	4	25	165	1,409	3,902	47,447
Total	1,189	6,320	24,918	135,411	737,580	2,029,535
Trailers/semi-trailers without power supply	no. of loans: 873			value of loans (thousand RON): 104,496		
BT Leasing Moldova						
Private individual clients	21	249	740	1,928	16,572	40,775
Micro Business Clients	19	86	332	1,523	7,600	24,051
SME clients	8	56	345	740	5,820	25,111
Medium Corporate Clients	2	15	342	323	1,796	20,934
Total	50	406	1,759	4,514	31,788	110,871

Financed emissions

In recognition of the escalating attention to climate change, BTFG is aligning its actions with the larger global commitments. As the leading financial group in Romania, it acknowledges its potential role in ecological sustainability and is heeding the pressure to understand and manage financed emissions. These emissions include both direct and indirect emissions influenced by its financing and investment actions.

In calculating and assessing the financed emissions associated with its diverse lending and investment portfolios, BTFG, has utilized the globally recognized Partnership for Carbon Accounting Financials (PCAF) methodology. The portfolios of the following BTFG's entities are included in the computation of financed emissions: Banca Transilvania, Victoriabank, BT Leasing Transilvania, BT Leasing Moldova, BT Microfinantare and BT Asset Management. For the portfolios of the other entities within the Group, there is currently no available methodology for calculating the financed emissions.

PCAF Methodology Overview

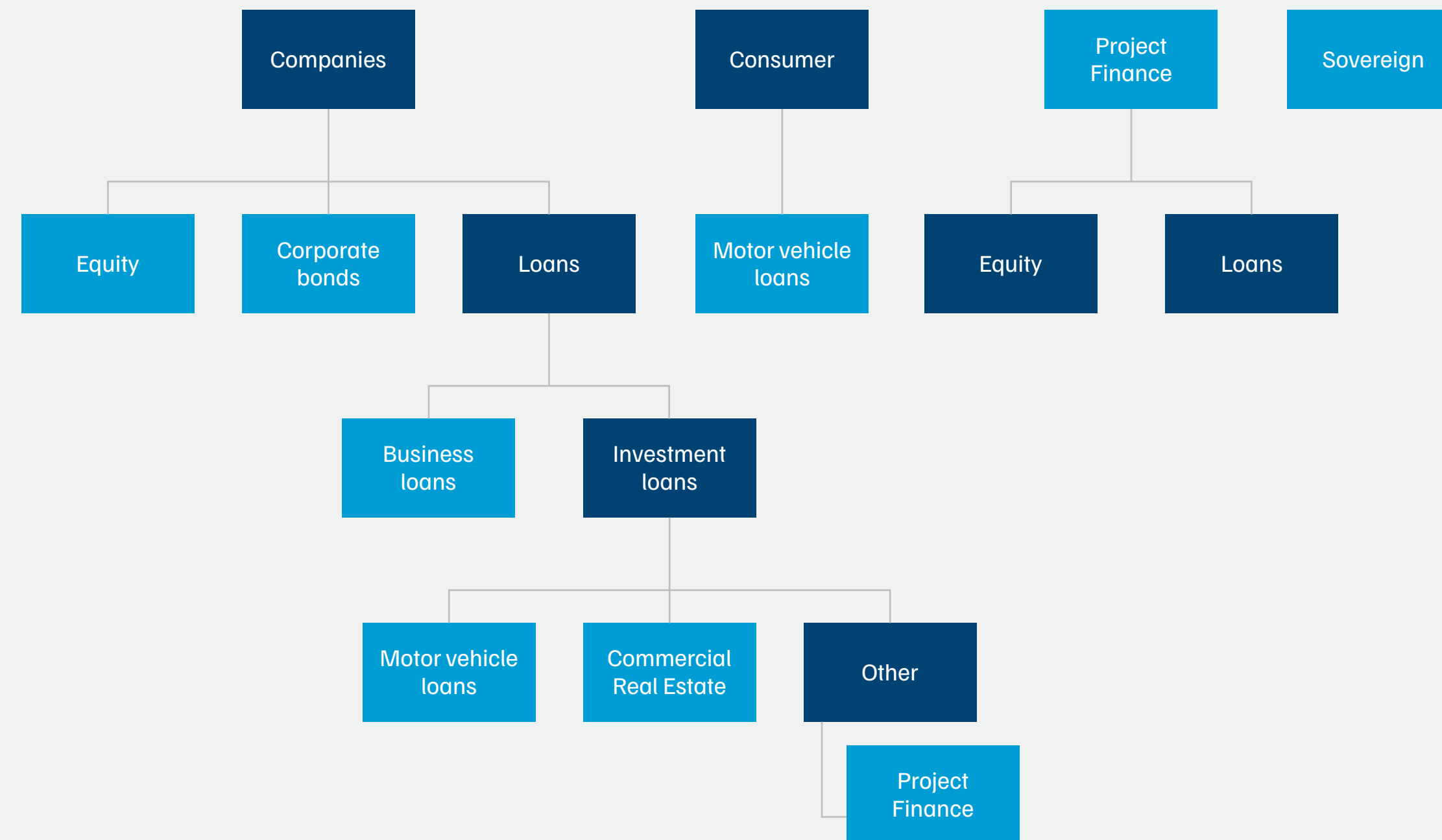
The Partnership for Carbon Accounting Financials (PCAF) is a global standard used by financial institutions to measure and disclose greenhouse gas emissions (GHG) associated with their lending and investment portfolios. It is fundamentally instrumental in helping organizations understand their carbon footprint, thus enabling them to devise strategic initiatives towards a more sustainable lending and investment activity.

The PCAF has developed different methodologies tailored to measure emissions for various financial products and investment categories, including but not limited to project finance, mortgages, commercial real estate, automobile loans, corporate loans, and investments.

The methodology utilizes multiple data points, including balance sheet exposure, client-level data, transactional data, and sector-specific data, to calculate financed emissions. The data granularity can significantly impact the accuracy of the emission calculations. The outcome is usually represented as absolute emissions or emission intensity, providing key information for strategic decision-making and goal setting towards a climate-resilient economy.

Applying the PCAF methodology to BTFG involves a multi-step process:

1. Allocation of exposures to one of the categories below:



*the following exposures are excluded: consumer loans (secured and unsecured), exposures to municipalities, off-balance sheet exposures, derivatives and exposures to supranational institutions

2. Delivery of required data using a predefined data format. Depending on category, the data include exposure value, financial data of the counterparty, value of the underlying asset at origination date (RRE, CRE, Vehicle), type and details on the underlying asset, EPC rating of the property, sector of activity of the counterparty.

3. Calculation of financed emissions

- a. The general formula for calculating financed emissions is:

Financed Emissions =

Emissions × Attribution Factor,

where:

Emissions: These are the actual GHG emissions of the counterparties. Can be derived using three options:

- directly reported emission by the counterparty
- physical activity-based emissions (gas consumed, tons of steel produced, etc.)
- economic activity-based emissions (tCO₂/million revenue)

Given the limited data availability, in case of the current calculation, most of the emissions were computed based on economic activity. The directly reported emission collected for a small number of counterparties represent only Scope 1 and Scope 2.

Attribution Factor: This factor determines the share of emissions attributable to the financial institution based on its financing. It's calculated by taking the outstanding amount of a loan or investment and dividing it by some measure of the total value (like value at origination for real estate or vehicles and enterprise value for business loans). It is always limited to 1.

a. More specifically, in case of BTFG:

i. Mortgage loans, Commercial Real Estate

1. Emissions: computed based on property type, EPC rating and surface, using the PCAF European building emission factor database (<https://building-db.carbonaccountingfinancials.com/>)

More specifically, the following assumptions are applied:

Where EPC rating or surface were not available, we considered an EPC class C, respectively 70 square meters.

If the exposure is covered by other types of collaterals, apart from RRE or CRE, the exposure is weighted according to the share of the values of the collaterals in total collaterals value to consider only the proportion covered by RRE and CRE respectively.

2. Attribution factor: computed based on share of exposure out of property value.

ii. Vehicle loans

1. Emissions: computed based on vehicle type, fuel type and emission/km, using the European Environment Agency CO₂ emissions database (co2cars.apps.eea.europa.eu/)
2. Attribution factor: computed based on share of exposure out of property value at origination.

iii. Business loans, Corporate bonds, Equity

1. Emissions: mostly computed based on average industry emissions using data as per National Institute of Statistics. In limited cases, the emissions were directly reported by the counterparty in their annual reports.
2. Attribution factor: computed based on share of exposure out of total assets.

iv. Sovereign

1. Emissions: taken over from EDGAR - Emissions Database for Global Atmospheric Research (edgar.jrc.ec.europa.eu/)
2. Attribution factor: computed based on share of exposure out of total country PPP GDP USD using World Bank Open Data (<https://data.worldbank.org/indicator/NY.GDP.MKTP.PP.CD>)

4. Allocation of data quality score

a. Data Quality Scores (DQS) in the context of the PCAF methodology refer 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 Data Quality Scores to encourage transparency and improvement in data quality over time.

- i. Data Sources: Data can be sourced from direct company reports, third-party databases, estimates based on economic activity, or default industry values. Each of these data types may have a different quality score based on its reliability and precision.

ii. Quality Tiers: The PCAF methodology typically categorizes data into different quality tiers, where reported and verified emissions data from companies would score better compared to estimated or default emissions factors.

iii. Score Implications: The DQS informs users about the confidence they can place in the calculated financed emissions.

iv. Continuous Improvement: The DQS is not just a static indicator; it is meant to encourage financial institutions to continuously seek better data and improve their emissions calculations. Over time, as companies disclose more detailed and verified emissions data, financial institutions can revise and improve their DQS.

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

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

a. More specifically, in case of BTGF:

i. Score 2:

1. Where emissions were directly reported by the counterparty in their annual reports (Business loans, Corporate bonds, Equity)

2. Sovereign

ii. Score 3: Mortgage loans, Commercial Real Estate

iii. Score 4: Business loans, Corporate bonds, Equity

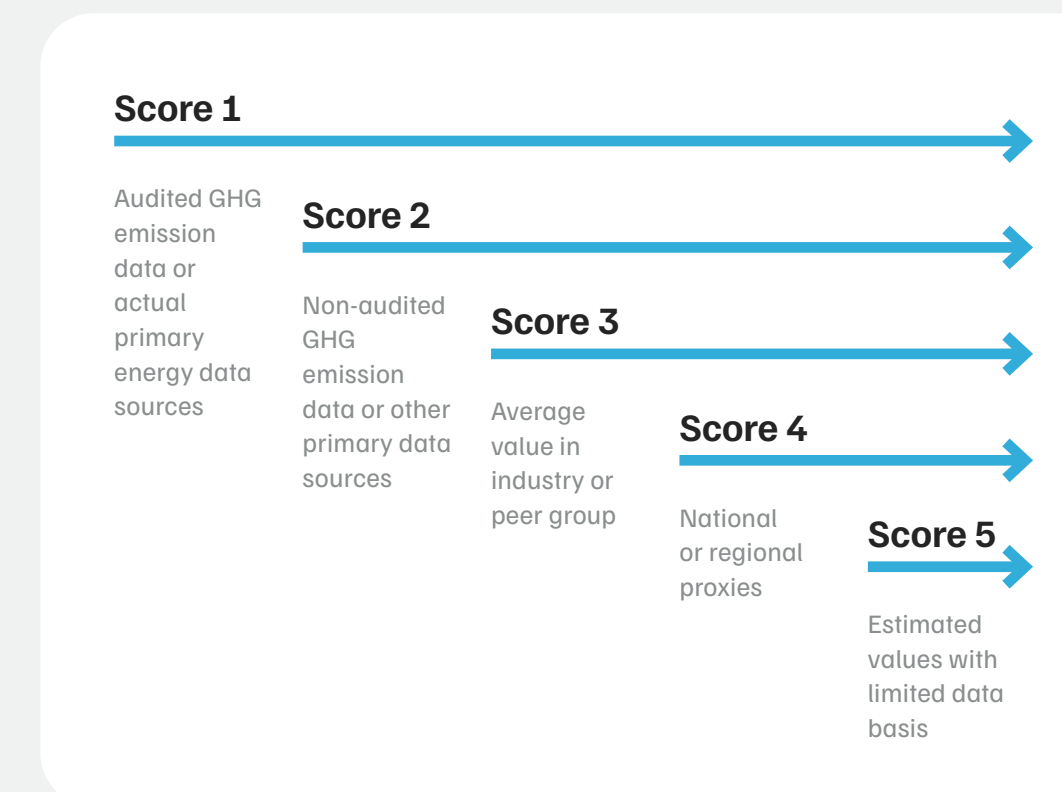
iv. Score 5: Vehicle loans

Results

The total financed emissions calculated for BTFG serve as an essential metric for the Group's climate-related impact. It paves the way for understanding where the most substantial emissions are generated within the portfolios and helps identify areas for potential improvement.

Please note that the emissions in the tables below are solely tied to the Group's financial activities and do not include emissions from the Group's operations (scope 1, scope 2 and other scope 3 emissions).

The calculation of 2023 financed emissions covers 100% of the credit exposures for which there is a PCAF methodology defined. This represents 57% of the overall credit exposure. The remaining uncovered exposure represents consumer loans (secured and unsecured), exposures to municipalities, off-balance sheet exposures and share of mortgage loans and commercial real estate loans covered by other types of guarantees, other than RRE or CRE.



Total Financed Emissions (tCO₂) & emission average intensity split by Account Type (tCO₂/MRON financed), ordered by Emission Intensity

Account Type	OnBalance RON equiv	out of which has direct emissions collected/reported	Emissions tCO ₂	out of which were directly reported/collected*	Financed Emissions tCO ₂	Intensity tCO ₂ / million RON	Intensity contribution to Group average	DQS_Weight	AvgWeightDQS	DQS contribution to Group average
Business loans	29,743,930,496	948,806,040	527,749,484	228,343,051	2,615,999	87.9507	53.67%	119,887,900,338	4.0307	38.98%
Commercial real estate	694,210,059	-	106,226	-	27,473	39.5745	0.56%	2,082,630,178	3.0000	0.68%
Vehicle Loans	3,225,550,778	-	279,879	-	127,809	39.6240	2.62%	16,127,753,682	5.0000	5.24%
Mortgage loans	9,142,804,145	-	406,460	-	220,426	24.1093	4.52%	27,432,020,787	3.0004	8.92%
Project Finance	2,009,196,471	-	5,004,943	-	44,220	22.0090	0.91%	8,533,277,889	4.2471	2.77%
Sovereign	53,541,696,198	-	17,358,667,636	-	1,823,306	34.0539	37.41%	107,083,392,395	2.0000	34.82%
Equity	432,920,384	314,270,423	5,843,715	5,410,769	1,292	2.9853	0.03%	2,031,142,982	4.6917	0.66%
Corporate bonds	5,932,003,333	1,207,897,015	112,135,939	1,921,091	13,514	2.2782	0.28%	24,387,435,433	4.1112	7.93%
TOTAL	104,722,311,863	2,470,973,477	18,010,194,281	235,674,911	4,874,040	46.54	100%	307,565,553,684	2.94	100%

*The directly reported emission collected for a small number of counterparties represent only Scope 1 and Scope 2.

Limitations

This study, while extensive and meticulously done, had a few unavoidable constraints that can impact the interpretation of the calculated emissions.

→ **Standardization:** The PCAF Methodology, though thoroughly established, still has areas of standardization in progress, particularly for certain asset classes. This evolving aspect can influence the results of the assessment.

→ **Assumptions:** The methodology is susceptible to the effects of assumptions applied during emission calculations, such as the use of average emission factors. In instances where more specific data may be unavailable, assumptions can lead to potential discrepancies.

→ **Future Emissions:** The methodology does not consider the trajectory of future emissions from financed activities, which might be significant in a longer-term scenario.

However, despite these limitations, the study provides a substantial assessment of the Group's financed emissions, which serves as a crucial starting point for the Group to assess its contribution to climate change and devise effective strategies for green transformation.

In 2023, the financed emissions decreased compared to 2022, with emission intensity being much lower, overall and on every asset class, as depicted in the next table: 0.048 kg CO₂/RON versus 0.064 kg CO₂/RON.

Asset Class	Financed emissions [t CO ₂ e]		Intensity value [kg CO ₂ e / RON outstanding]	
	2023	2022	2023	2022
Business loans	2,615,999.15	3,657,771.23	0.088	0.095
Commercial Real Estate	27,473.03	8,483.98	0.040	0.034
Vehicle Loans	127,809.07	68,936.75	0.040	0.020
Mortgage loans	220,426.36	617,403.10	0.024	0.031
Project finance	44,220.34	83,561.28	0.022	0.031
Equity and Corporate bonds	14,806.83	18,502.56	0.002	0.005
Sovereign	1,823,305.57	-	0.034	-
TOTAL FINANCED GREENHOUSE GAS EMISSIONS	4,874,040.35	4,534,658.89	0.047	0.064

Non-GRI indicator (company specific)

This variance stems from the increased awareness in the lending policy, as well as due to minor revision of the computation basis, as summarized next:

→ The exposure definition used in the computation of financed emissions was revised in 2023 to exclude the off-balance sheet items consisting of unutilized exposure and LG/LC facilities for that were included in the 2022 report.

→ In respect of mortgage loans, further refinement was applied in 2023 computation of financed emissions due to (i) improved availability of data in respect of EPC category as a result of the bank's endeavors to process and store data from collected EPC from customers and (ii) improved data in respect of retail loans with mortgage collaterals that resulted in a more accurate identification of loans granted for the purchase and refinancing of residential property.

→ Exclusion of loans granted to municipalities that PCAF methodology does not yet cover that, in 2022 computation of financed emissions were considered as business loans.

→ For 2022 computation, loans for general purposes (i.e., with unknown use of proceeds) collateralized by properties were included in the commercial real estate (CRE) loans categories. This approach was amended in 2023 to reflect a more accurate representation and, therefore, only the loans for specific corporate purposes (i.e. CRE) were included in the computation.

→ The data quality in 2023 was significantly improved compared to 2022 mainly for business loans, vehicle loans, equity instruments and debt instruments, leading to more accurate and reliable results.

→ In 2023, we also included the exposure to sovereign (mainly Romanian government bonds) in the computation of financed emissions for the first time.

Nevertheless, BTFG ongoing commitment includes enhancing alignment with PCAF methodologies and enhancing data quality to accurately reflect the emissions associated with our financed activities. By aligning with PCAF methodologies and improving data quality, we aim to accurately measure, monitor, and report on our carbon footprint and progress towards our environmental goals.

4.1.2 Carbon footprint

In 2023, we have expanded our carbon footprint calculation to include additional categories relevant to our Scope 3 activities, i.e. indirect emissions associated with the BTFG value chain.

The calculation of our business-related carbon footprint in 2023 therefore covers the following categories:

- | | |
|---|---|
| <ul style="list-style-type: none"> → Scope 1: Stationary combustion emissions → Scope 1: Mobile combustion emissions → Scope 1: Refrigerants → Scope 2: Emissions from purchased energy (location-based), including thermal energy → Scope 2: Emissions from purchased energy (market-based), including thermal energy | <ul style="list-style-type: none"> → Scope 3: <ul style="list-style-type: none"> • 3.1: Purchased good and services • 3.3: Fuel- and energy-related activities (not included in Scope 1 or 2) • 3.5: Waste generated in operations • 3.6: Business travel, including accommodation during travel • 3.7: Employee commuting |
|---|---|

The five categories of Scope 3 emissions included were determined internally, following an analysis of the availability of activity data necessary to perform the related calculation.

Scope	Activity t CO ₂ e	2023			
Scope 1	Stationary combustion	2,688.16	Scope 3	Purchased good and services	21,431.56
	Mobile combustion	2,885.66		Fuel- and energy-related activities (not included in Scope 1 or 2)	1,658.70
	Refrigerants	1,295.48		Waste generated in operations	55.74
Scope 1 - Total		6,869.30	Business travel - by air or train	497.30	
Scope 2	Purchased electricity (Location Based)	5,662.61	Business travel - hotels	126.89	
	Purchased electricity (Market Based)	1,760.64	Employee commuting	20.22	
	Thermal energy	228.99	Scope 3 - Total	23,787.51	
	Scope 2 - Total - Location-based	5,891.60	Total	Total Emissions - Location-based	36,548.41
	Scope 2 - Total - Market-based	1,989.63	Total	Total Emissions - Market-based	32,646.44

Calculation methodology, data source, source of emission factors, and estimates

Scope 1 - Stationary combustion

This category included direct GHG emissions from stationary (non-transport) combustion of fossil fuels in an installation (e.g. boilers, turbines, thermal power plants). In this specific case, BT's reported gas consumption was included in the calculations. The data was processed using an emissions calculation tool (GHG Tool Calculator) developed and owned by EY. The emission factors used in the calculation were taken from the Minister of Environment, Water and Forestry Order No. 2.057/2020, as subsequently amended and supplemented.

Scope 1 - Mobile combustion

This category includes direct GHG emissions associated with fuel combustion in mobile sources owned or operated by BT. In this specific case, the diesel and petrol consumption of BT-owned/operated vehicles has been included in the calculations as reported by BT. The data was processed using an emissions calculation tool (GHG Tool Calculator) developed and owned by EY. The emission factors used in the calculation were taken from the US EPA 2023 public database.

Refrigerants

This category includes direct greenhouse gas emissions from refrigeration and air conditioning systems, fire extinguishing systems, and the purchase and release of industrial gases. In this specific case, the refrigerants used by BT were also included in the calculations, as reported by BT. BT did not provide specific information on the quantities of refrigerants consumed in 2023, but only the maximum quantity of refrigerants at BT, calculated on the assumption that, hypothetically, all air conditioners were fully charged with refrigerants in 2023. Together with BT, it was estimated that the average time between the purchase of a refrigerant and its next refill is 5 years. We therefore divided the maximum refrigerant capacity by 5 to estimate the annual consumption.

The data was processed using an emissions calculation tool (GHG Tool Calculator) developed and owned by EY. The emission factors used for the calculation were taken from the Order of the Minister of the Environment, Water and Forestry No. 2.057/2020, as amended and supplemented, and from the Intergovernmental Panel on Climate Change (IPCC) report "Climate Change 2021: IPCC Fifth Assessment Report (AR5)".

Scope 2 - Purchased electricity

This category includes indirect GHG emissions resulting from the purchase of electricity, steam, heat, or cooling.

Location-based: Reflects emissions based on the locations where a company operates.

Market-based: Reflects energy purchasing decisions and actions taken by the company.

In this specific case, BT's reported electricity and heat consumption in the central system was included in the calculations. The data was processed using an emissions calculation tool (GHG Tool Calculator) developed and owned by EY. The emission factors used in the calculation were derived as follows:

a) Location-based: the national emission factor for the electricity mix published by ANRE for 2022 (the emission factor for 2023 has not yet been published).

For heat from central heating systems, the emission factor published by Order of the Minister of the Environment, Water and Forestry no. 2.057/2020, as subsequently amended and supplemented.

b) Market-based: BT purchased significant amounts of green electricity in 2023, for which EY applied a zero emission factor. For other types of electricity, the national emission factor for the electricity mix published by ANRE for 2022 was used.

For heat from the central systems, the emission factor published in the Order of the Minister of the Environment, Water and Forestry No. 2.057/2020, as amended and supplemented, was used.

Scope 3.1 - Purchased goods and services

This category includes all upstream emissions (from the beginning to the end of the production cycle) resulting from the production of products purchased or acquired by the reporting organization during the reporting year. Products include both goods (tangible products) and services (intangible products).

For this category, the approach taken was to prioritize the categories of products and services that are most relevant to BT in 2023 in terms of volume of purchases. This resulted in a list of services and products, with services being by far the dominant type of procurement.

For services, the spend-based method was used to calculate CO₂, while for products the average value method was used instead.

The data was processed using a greenhouse gas calculation tool developed and owned by EY. Based on the data received (using different units of measurement), the emission factors used in the calculation were obtained from various sources: the French public database ADEME 2023, the UK public database DEFRA 2023, the German public database OEKOBAUDAT and, where possible, directly from the supplier.

Scope 3.3 – Fuel and energy activities

Această categorie include emisiile legate de producția de combustibili și energie achiziționată și consumată de societatea raportoare în anul de raportare, care nu sunt incluse în domeniul de aplicare 1 sau domeniul de aplicare 1.2. În scopul acestui calcul, am introdus datele furnizate de BT în ceea ce privește consumul de gaz, încălzire urbană și electricitate. Datele au fost prelucrate cu ajutorul unui instrument de calcul dezvoltat și deținut de EY. Factorii de emisie utilizați pentru calcul au fost preluați din baza de date publică DEFRA 2023.

Scope 3.5 - Waste from operations

This category includes emissions from the disposal and treatment by third parties of waste generated at facilities owned or controlled by the reporting organization during the reporting period. For this calculation, we have included the waste data provided by BT. As the waste data received was partial (incomplete), the data presented in this report is also partial.

The data was processed using an emissions calculation tool developed and owned by EY. The emission factors used in the calculation were taken from the DEFRA 2023 public database.

Scope 3.6 - Business travel

This category includes emissions from the transport of employees for business-related activities in vehicles owned or operated by third parties, such as aircraft and trains. For this calculation, we have received the following type of data:

- Data on air travel;
- Data on rail travel;
- Hotel accommodation data.

Business travel data was processed using an emissions calculation tool developed and owned by EY. For business travel, the emission factors used in the calculation were taken from the DEFRA 2023 public database. For hotel accommodation, we used emission factors from the UK public database DEFRA 2021, as this is the most recently updated version.

Scope 3.7 - Employee commute

This category includes emissions from employees traveling between home and the workplace. Emissions from employee commuting can come from a variety of transport modes (e.g. car, metro, cycling, walking).

For this purpose, the EY team developed a survey which BT distributed to all employees. The survey sought to establish employees' usual mode of transport, type of vehicle (if they use a vehicle), and distance from home to work. The survey was completed by 1,960 BT employees, approximately 16% of the total workforce. In the absence of any other data on the travel habits of other BT employees, the partial results were transposed and approximated to the whole team by multiplying the emissions from the responses of the 1,967 employees by 6 to obtain an estimate of the CO₂ emissions for the "employee commuting" category.

Data on car mileage using different fuel types was processed using the emissions calculation tool developed and owned by EY. The emission factors used in the calculation were taken from the DEFRA 2023 public database.

4.1.3 Energy consumption

Electricity consumption aspects are set out in the Bank's [Environmental Policy](#). The Procurement, Investment, and Logistics Department is responsible for monitoring consumption and reporting it to the Board of Directors as well as to other relevant departments.

All daily activities of our employees require the use of electricity in one form or another: from lighting the workstations to ensuring the functionality of the equipment used. For this reason, we closely monitor consumption and continuously upgrade our facilities to achieve a high degree of energy efficiency.

This is our goal: to reduce our environmental impact, including by reducing our energy consumption. Some of the key actions we have taken to achieve this are:

- Smart building lighting - implemented in every renovated or upgraded facility
- Replacing equipment used in day-to-day activities with more energy-efficient ones
- Construction or refurbishment of buildings, aiming at achieving energy-efficient buildings
- Replacing the building cooling and heating equipment with more energy-efficient, higher-energy class ones
- Training of employees to behave appropriately concerning electricity consumption

Total fuel consumption from conventional sources (fuel for combustion in boilers, furnaces, incinerators, generators, vehicles, etc.)		2023
Fuel type		UM [GJ]
Gasoline (BTFG)		23,308.92
Diesel (BTFG)		26,415.94
Natural gas		51,655.68
Electricity		103,426.35
<i>of which renewable electricity</i>		77,396.40
Thermal energy		4,418.82
Total energy consumption		209,225.72

75% of all electricity consumed at BTFG comes from renewable sources.

BT Financial Group

$$\text{Energy intensity} = \frac{\text{Total energy consumption}}{\text{Turnover of BTFG}} = \frac{209,225.72 \text{ GJ}}{12,051.46 \text{ million RON}} = \mathbf{17.36 \text{ GJ/ million RON}}$$

4.1.4 Resource use

Although the environmental impact of the banking system is largely indirect, generated by the projects that the Bank chooses to finance, the administrative activities of day-to-day operations also have a negative impact on the natural environment, in particular through the consumption of materials and the generation of waste. Proper management and a low proportion of waste sent to landfill or incinerated without energy recovery help to reduce the negative impact.

The materials used within the Bank and the Group's subsidiaries are intended to support office work or office fit-out/maintenance. These may vary significantly from year to year depending on the timing of equipment replacement or maintenance activities.

Materials used	UM	2023		
		Romania – BT	Romania subsidiaries	Moldova subsidiaries
Paper	tonnes	639.02	29.47	27.07
Cardboard	tonnes	9.55	0.04	0.08
Plastic	tonnes	33.08	1.30	0.05
Biodegradable plastic	tonnes	0.36	-	-
Metal	tonnes	1.81	-	84.00
Glass	kg	81.60	-	-
Lighting fixtures*	pcs	1,383.00	-	-
Furniture	pcs	2,510.00	91.00	1.00
Cartridges / Toners	pcs	506.00	486.00	240.00
Batteries	pcs	4,282.00	40.00	320.00

*installed in 2023

Of the total materials used, a proportion were recycled or certified as sustainably sourced (FSC certified), as shown in the table below.

Materials used	UM	2023		
		Romania – BT	Romania subsidiaries	Moldova subsidiaries
Paper	kg	-	537.50	431.83
Cardboard	kg	-	-	118.92
FSC paper	kg	351,048.00	336.00	-
Recycled plastic cards	kg	12,163.00	-	-
Plastic	Kg	11,777.00	-	-

At BTFG, waste is generated both by employees and by the day-to-day operations of all banking units. Paper, plastic, electrical and electronic waste, waste batteries and accumulators, lighting equipment, printer cartridges, and household waste are the main waste materials included in the waste management process. The vast majority of the Bank's processes involve the use of paper and plastic to produce documents, issue cards to clients, or send correspondence by post. Waste batteries and accumulators, used printer cartridges and WEEE (waste electrical and electronic equipment) are an integral part of employees' activities. If improperly managed, this waste can contaminate the environment, harm wildlife, or even endanger human health.

As a result, BTFG companies pay close attention to waste management and aim to continuously optimize all processes to reduce the amount of waste generated, in particular by reducing resource consumption and through separate and efficient waste collection.

Waste type	UM	Total waste generated	
		BTFG Romania	BTFG Moldova
Paper	tonnes	1,262.29	46.18
Metal	tonnes	0.41	n/a
Lighting fixtures	tonnes	0.18	n/a
Batteries	tonnes	0.08	0.01
Plastic	tonnes	50.73	n/a
WEEE	tonnes	13.14	n/a
Household waste	tonnes/m ³	1,380.43	476.39
Wood	tonnes	2.93	n/a
<i>printer toners</i>	tonnes	50.39	n/a

*Subsidiaries SALT Bank and BT Pensii reported the total amount of waste generated for the following categories: paper, metal, plastic, household waste, and wood.

2023

At the Banca Transilvania level, the Environmental Policy is implemented, as well as the Waste Management Procedure, which lists the specific waste generated by office activities: (paper/cardboard, plastic, glass/metal, and municipal), WEEE resulting from the maintenance and replacement of used electrical and electronic equipment, and hazardous waste (used printer toner, spare parts, and tires). Quantities of waste generated can be reused (e.g. office equipment, laptops/ computers/printers/phones), which are removed from the Bank's accounting records and sold/donated, or recycled (contracts with recycling companies are in place for all types of waste), reused (contracts with printer/toner suppliers who recover parts of used toners for further reuse) or destroyed/disposed of.

Water consumption

Within the BTFG companies, water consumption is limited to the day-to-day needs of the offices, which are supplied by specialized companies that also collect the water used in the sewerage systems and treat it in accordance with current legislation.

	UM	2023		
		Romania – BT	Romania subsidiaries	Moldova subsidiaries
Water used	m ³	85,505.00	561.00	9,786.00
Water discharged	m ³	85,505.00	561.00	9,786.00

4.2 Social impact and responsible banking



4.2.1 Access to financial services, inclusion, and financial education

Ensuring inclusion and access to financial products and services is crucial for community development. Accessibility plays a key role in reducing inequality, promoting business expansion, facilitating job creation, and improving employment opportunities. In addition, it encourages innovation within the financial sector, leading to progress and prosperity for all members of society.

The bank offers its clients a range of solutions that support Romanian individuals or entrepreneurs, regardless of their location, income level, or business size, and facilitate access to financial products and services, including for people in unbanked areas.

These solutions include:

→ Clients can register, open an account, and obtain their card entirely online via the BT Pay app. The card is delivered by courier to the address provided by the client and instant access is provided digitally within the app free of charge. This means that clients can use their funds immediately without having to go to the bank. The digital card has no usage restrictions and can be used for online transactions, with all card details easily accessible in the BT Pay app;

→ Clients can apply for a range of banking services entirely online via the BT Pay app, including credit cards, overdrafts, credit limit increases, virtual debit cards in RON and EUR, travel insurance, RCA insurance, Kiddo cards for kids aged +10 years, access to a limited version of the BT Pay for children - BT Pay Kiddo. All these contribute to extending access to banking products, including credit products, in unbanked areas.

BT's solutions for young people include a youth card with specific benefits. With the BT Omnipass card, they benefit from free current account opening and card issuance, free travel insurance abroad, and discounts within the Omnipass programme. Criteria for issuing the product: clients must be between 14 and 30 years old.

BT also has dedicated products and services for children such as Kiddo debit card and BT Pay Kiddo app, aiming to contribute to forming positive financial habits with parental guidance. Our desire is to build a solid foundation for financial education and independence, under the guidance of their parents, to provide them with the knowledge and tools necessary to understand and manage money responsibly and intelligently.

Access points in economically underdeveloped or less populated	Banca Transilvania		
	2023	2022	2021
ATMs	6.3%	5.8%	5.4%
POS	9.8%	8.4%	7.0%
Cards	15.2%	15.0%	15.0%
	Banca Transilvania		
	2023	2022	2021
% rural BT customers with BT cards in the BT Pay wallet	58.7%	48.0%	31.3%
% BT clients with cards in the BT Pay wallet or other BT-integrated wallets	13.6%	12.0%	12.0%

At the same time, in 2023, **48% of the BT Direct's cardholders live in rural areas**, compared to 42% in 2022. BT Direct's cardholders are included in an educational programme related to the usage of the card in the month following the issuance of the product. Customers are contacted by phone and are presented with the features and how to use the product based on an educational script.

First-year free account for start-ups (CPAG)

For start-up entrepreneurs, we have designed a comprehensive package that includes a Visa Business Silver debit card, Internet&Mobile banking, a current account, and unlimited transactions in lei and foreign currency, all free of charge.

After one year of use, customers automatically benefit from the Unlimited Current Account package, which provides them with cost savings and greater ease of banking.

In addition, we offer the same facilities for non-profit associations, plus 25 free interbank transactions.

CPAG results in 2023:

57,566 new CPAG set-ups, of which 56,890 are new customers

(with an account opened no more than 30 days before the package was set up)

	2023	2022	2021
Number of new CPAG accounts	56,890	53,561	45,804

BT Mic

BT Mic aims to complement BT Group's financial ecosystem by providing funding to the smallest businesses in the market, businesses that in most cases do not have access to financing. Thus, BT Mic offers financing both for starting entrepreneurs (start-ups operating for only 3 months) and for small companies with an annual turnover of up to 1 million lei. Through BT Mic, we finance businesses of any form of organization, beyond the classic commercial company, i.e., authorized private individuals, sole proprietorships, self-employed professionals, individual agricultural producers, and associations/foundations. Our typical client is usually a family business, often merging the family unit with the economic unit. The purpose of the loans granted by BT Mic is extremely diverse: from supporting and developing day-to-day business activity, purchase of goods, payment of suppliers to investing in workpremises and/or opening new ones, purchase of machinery, and equipment.

To support the access to finance for micro-companies and start-ups, BT Mic has played an important role, with the following developments in 2023:

147% increase in loan balances and 108% increase in the number of financed clients.

BT Mic financing as of December 31	2023	2022	2021
No. of clients financed from start to date	28,303	13,598	17,607
No. of loans granted from start to date	39,837	17,705	23,460
Amount granted from start to date	2,280,689	922,418	1,274,113

RON thousand

We know that inclusion and diversity contribute to innovation and economic growth, which is why BT Mic supports and encourages the development of female entrepreneurship. At the end of 2023, BT Mic had around 8,886 loans outstanding to female-owned clients (41% of the total portfolio). In 2023, the number of loans granted to women-owned businesses was 3,756, an increase of 31.09% from 2,728 in 2022.

BT Mic: Total loans granted in:	2023	2022
Outstanding loans to clients with female shareholders	8,886	7,300
Loans granted to customers with female shareholders	3,576	2,728
Outstanding loans granted to customers with shareholding <30 years	3,320	2,250
Loans granted to customers with shareholding <30 years	1,335	1,336

Moreover, BT Mic also continued in 2023 to contribute to a higher level of financial education among entrepreneurs:

- it is the primary lender for approximately 75% of the new credited clients (based on the total number of BT Mic clients in 2023);
- approximately 18% of the loan portfolio is represented by loans granted to start-ups in Romania (companies with less than 12 months of economic activity at the time of financing).

Victoriabank

At Victoriabank, we prioritize financial accessibility and inclusion for all people. We believe that banking services should be easily accessible to all, regardless of background or financial status. From providing easy-to-use online banking platforms (VB24) to setting up branches in remote areas, we strive to meet the diverse needs of our customers.

Access points in economically underdeveloped or less populated areas	2023
Number of units	34
ATMs	112
POS	2,668
Cards	211,617

Stup

Stup is a unique concept launched in 2022 as a result of the interactions that Banca Transilvania and BT Mic have had over the years with customers and the business community. It is a one-stop shop for entrepreneurs or future entrepreneurs. A place where you can find the business solutions you need to start and develop any business, a place to meet, learn, network, and dialogue.

In 2023, Stup hosted 212 events attended by 8,084 people.

In addition, 1,294 unique entrepreneurs registered on the Stup platform in 2023, resulting in 2,319 business solutions sold, compared to 185 entrepreneurs and 306 solutions sold in the second half of 2022.

Of these, 278 companies were established at Stup in 2023 and purchased an average of 3.53 products, while 40 companies were established in 2022 and purchased an average of 3.73 products. There was also a notable increase in acquisitions related to the migration of businesses online and the digitalization of companies, with 357 and 1,454 products purchased in 2023, respectively, compared to 55 and 512 products in 2022.



Financial education

Improving financial literacy is a fundamental aspect of our commitment to positively impact society. We strongly believe that providing comprehensive financial education to our employees, partners, and customers is essential to make informed decisions.

At the Bank level, the main projects we support in this regard are:

- FIT - Finance for All
- FIT Streams
- Școala Altfel
(A different type of School)
- Tabăra Urbană
(Urban Camp)
- #Dreptullabanking
(The Right to Banking)
- Întreb BT
(Ask BT)
- BT Club - The Romanian Entrepreneur's Club
- From numbers to money

FIT - Finance for All

FIT - Finance for All is the financial education programme disseminated across all age and education groups.

Romania ranks last in terms of financial education, according to the Eurobarometer on Monitoring Financial Literacy in the EU, published in 2023. Taking this into account, the need for financial education at national level is considerably high, given that Romania ranks among the lowest countries in terms of financial literacy worldwide, being ranked 123rd out of 143 countries.

The FIT - Finance for All project was launched in 2023 by Banca Transilvania, aiming to turn FIT into the largest national financial education programme in Romania, aiming to contribute to the reduction of Romania's deficit compared to the European Union in terms of financial education and inclusion. Practical and simple questions in the field of financial education become topics of discussion, focusing on increasing the level of financial education of children and young people. Questions such as what savings mean, what to do with the money you've saved and where it goes, what the concept of interest is and how it works, or the difference between investing and spending, are all questions answered simply and easily.

FIT Streams

→ **"De toți banii"** (*All your money's worth*) – an online video show where we bring financial experts and public figures together to discuss a given topic in each episode. There will be 10 episodes in total, covering topics such as saving, credit, investing, etc.

→ **"Marea Capacitate Financiară"** (*Financial Quiz*) – a quiz platform where anyone can test their financial knowledge. The format will allow you to find out the correct answers in real-time, even when the wrong answer is chosen.

→ **"Edu Fin"** - an edutainment platform for children and young people, which explores financial concepts and topics with two characters: Edu & Fin.

Școala Altfel

A different type of School

Within Școala Altfel, colleagues from BT units get involved in financial education actions directly in schools. They are invited directly by teachers.

→ The initiative pertains to children aged 4 to 18 and aims to help young people become aware of the importance of adequate money management. Students participate directly in various interactive learning-by-doing activities held in the school and are introduced to basic financial concepts in an age-appropriate manner.

→ Through financial literacy activities, students will learn about the consequences of how they choose to spend their pocket money, how to differentiate between needs and wishes, and different money management strategies.

In 2023, approximately 500 students participated in this financial education initiative.

Tabăra Urbană

Urban Camp

Tabăra Urbană is a project initiated by the National Bank of Romania (NBR), the Financial Supervisory Authority (FSA), the Romanian Banking Association (ARB), and the Ministry of Finance (MF) for children in grades 6 and 7 in different cities of the country.

During the courses, financial concepts were presented and explained to the young people. Each group of students received useful information designed to develop healthy money management habits and the ability to make correct and informed decisions to improve their financial situation.

BT supported projects in Baia Mare, Oradea, Timisoara, Suceava, and Targu Mures. Colleagues in these locations received course support from ARB and each colleague allocated 8 hours per day for this project.

In 2023, 150 students participated in 5 events organized by the Tabăra Urbană project.

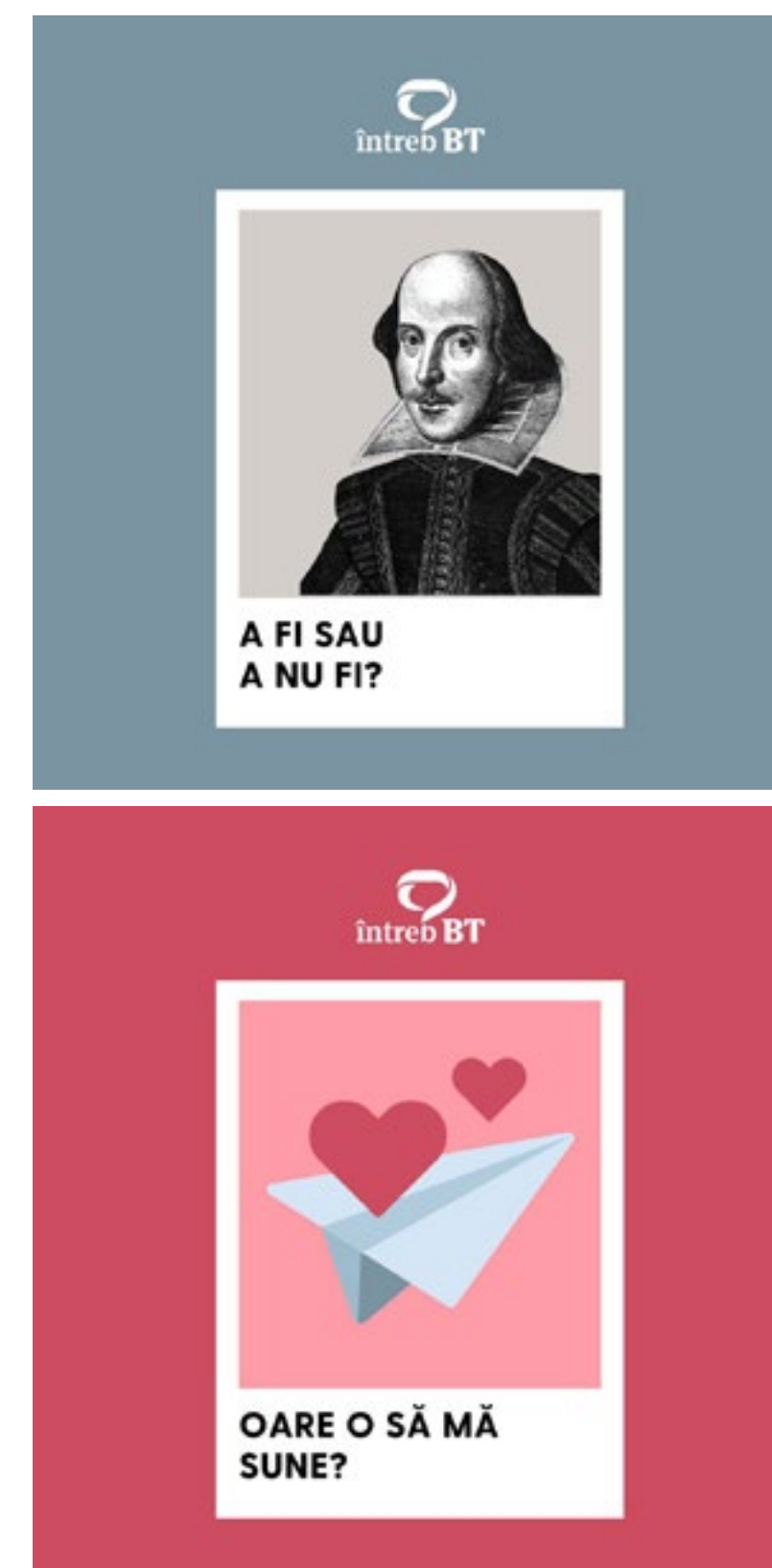
Întreb BT

Ask BT

Banca Transilvania has integrated artificial intelligence into the platform for the first time during 2023.

Ask BT had a record number of visitors in 2023, over 5 million. Compared to 2022, the number of users increased by 31% and the number of visits by 43%. Banca Transilvania's online platform is designed as an information search engine, with over 2,000 questions and answers about banking, and complements the communication channels with customers: the BT website, over 500 branches in 180 locations, the Call Center team, social media channels, and chatbots.

Banca Transilvania integrated artificial intelligence into Ask BT in October 2023 to simplify interactions and increase accessibility to platform content. Visitors searching through AI Search for information about self-banking products, services, and solutions receive an answer generated by large language models, which integrates information in a more user-friendly way and uses multiple information sources. Approximately 30,000 unique visitors have so far used the AI Search option more than 100,000 times.



#Dreptullabanking

The Right to Banking

The Right to Banking is an informal campaign initiated by Romanian Banks about banking rights and knowledge. The #Right to Banking campaign has increased its visibility both among the general public and the authorities, with the number of people who came into contact with the campaign reaching 11 million in 2023, and digital education as the most active area.

BT Club - The Romanian Entrepreneur's Club

Founded by Banca Transilvania in 2006, it is the first initiative addressed to entrepreneurs, providing them with continuous and free of charge services and access to relevant information in an interactive environment, both through training and seminars and also online.

From numbers to money

BT Club, together with Eusebiu Burcaş, continued in 2023 the financial education programme for entrepreneurs - [From numbers to money](#), dedicated to those who want to better understand business finance and the instruments available to them to increase the profitability of their business on the medium and long term.

The programme addresses entrepreneurs with a minimum of 12 months experience, with a turnover amounting to more than EUR 50,000, a minimum of 2 employees, and operating in one of the following sectors: services, construction, HoReCa/Tourism, e-commerce, IT, medical practices and who want to learn how to better manage and grow their businesses.

The programme consisted of 18 weekly, face-to-face meetings held from January 11, 2023, to June 14, 2023, with Eusebiu Burcaş at BT's headquarters in Cluj-Napoca. Each meeting lasted two and a half hours, during which the following topics were addressed:

1. Financial principles - your business model
2. The 3 P&L tools
3. Cashflow - the money control tool
4. Sources of finance and debt management
5. How to manage stocks
6. Key financial indicators
7. Financial dashboard
8. Pricing policies
9. Profit First - principles and operating procedures
10. Profit First in practice
11. Marketing - the secret weapon
12. Sales plan



The sessions were attended by a total of 51 entrepreneurs, of which 23 also participated in the first edition (held from November 2022 to February 2023) and 28 of them participated in the second edition (held from March 2023 to June 2023).

In addition, in March 2023, BT Club organized a webinar called "How to protect your business from inflation. Useful methods for entrepreneurs" (Cum să îți protejezi afacerea de inflație. Metode utile pentru antreprenori), organized in partnership with Eusebiu Burcaş. The webinar was attended by 187 participants.

During the hour-and-a-half webinar, the following topics were covered:

- Dynamics and effects of inflation for your business. What impact does inflation have on wages, selling prices, and financing your business?
- Changes in customer behavior in times of inflation. Probably one of the most important goals of an entrepreneur is to understand how customers think in an economic context.
- The two major mistakes in pricing policy. Pricing policy is the main weapon in the fight against inflation. If not used correctly, it will lead to unmanageable adverse effects.
- Cash management in inflation. How to properly manage the cash you have, the cash you expect from the market, and payments to suppliers.

Victoriabank – financial education programmes

Global Money Week

From March 21 - 27, 2023, Victoriabank joined the Global Money Week (GMW) - International Financial Literacy Week, an annual activity organized to raise public awareness of financial education, financial awareness, and inclusion issues for youth and children. The slogan of the event was "Make sense of your money". During the event, on March 24, the Victoriabank Head Office opened its doors and hosted students from the "Excelsis" secondary school in Chisinau in a relaxed atmosphere. During the educational meeting, 30 children enjoyed a tour of the bank's head office and the Chisinau Branch No. 3, which is the bank's largest branch.

Zoom in Banking

Victoriabank has provided and continues to provide educational and employment opportunities to students through the "Zoom in Banking" programme. Victoriabank and the European Business Association (EBA), together with the Academy of Economic Studies of Moldova, the State University of Moldova, and the Technical University of Moldova, completed the fourth edition of the "ZOOM in Banking | Paid Internships at Victoriabank" programme in 2023, with 4 Victoriabank employees as lecturers. More than 400 students and teachers have already participated in the first three editions of the "ZOOM in Banking" programme, and most of them have also registered for the current edition. The selection of the most capable and eager students to improve their practical skills in banking was done through tests, and after the training period, the finalists were offered paid internships and a real opportunity to be hired at Victoriabank.

In 2023, 4 editions of the Zoom in Banking programme took place, with the following results: 33 internship finalists, of which 7 students were hired by Victoriabank.

Victoriabank and AIESEC partnership

A new partnership between Victoriabank and the AIESEC team, the world's 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. Members of the organization are interested in global issues, leadership, and management. Through this partnership, Victoriabank and AIESEC Chisinau join forces to support the initiatives of young people in Moldova, help them develop their skills, and achieve their dreams.

This partnership is a testament to our shared commitment to contribute to the growth and development of young people in Moldova. Together, we are committed to supporting projects that promote the personal and professional development of young people, as well as projects that have a positive impact on the community. This partnership provides an excellent platform for young people in Moldova to express their creativity and put their ideas into practice with the support and guidance of practitioners.

We are convinced that through our collaboration, we can contribute to the development of a strong and successful generation in Moldova.

In 2023, Victoriabank organized, together with the AIESEC team, 2 events attended by 60 young people.

Financial Education Project for Children

In 2023, the Financial Education Project for Children was launched at Victoriabank - "A memorable day at the bank". Thus, Victoriabank's headquarters happily opened its doors and played host to 300 children, from first graders to teenagers in 10th to 12th grade, ready to explore the secrets of banking in a whole new way. The HR team created a personalized programme that captured the attention and amplified the curiosity of the students and the teachers who accompanied them. Throughout the year, young people played the role of a banker, built their courage, and learned all the secrets of a banking institution, from its operation to its products and services. They also discovered the mysteries of an ATM, took a journey into the history of banknotes, and learned many interesting facts about digital banking.

Digitalization

Digitalization plays a key role in the sustainable development of the banking sector, providing multiple benefits such as promoting financial inclusion, reducing the carbon footprint of banking operations, and facilitating the transition to a more sustainable, low-carbon economy.

A key benefit of digitalization is its ability to increase financial inclusion by making banking more accessible, especially to those who typically do not have access to traditional banking channels. With digital banking platforms accessible through mobile phones or the internet, people in remote or underserved areas, as well as those who cannot physically visit a bank branch, can access essential financial services. This accessibility promotes responsible economic growth and contributes to poverty reduction, which are essential components of sustainable development.

In addition, digitalization helps to reduce the carbon footprint of banking operations by replacing paper-based processes with digital transactions, significantly reducing paper consumption and energy use. Furthermore, by enabling clients to access banking services remotely, digital platforms reduce the need for travel, further reducing the carbon footprint associated with banking operations.

In 2023, Idea:Bank became **Salt Bank**, which has been operating as a 100% digital bank since June 2022.

Our goal is to become the first fully digital bank in Romania, eliminating physical branches and offering banking services exclusively through digital channels, namely a mobile banking app and wallet.

We differentiate ourselves from other neo-banks or FinTechs by prioritizing customer support through our dedicated call center. Our range of services includes current accounts, deposits, loans, daily, medium and long-term financing, foreign exchange, etc.

At the same time, Banca Transilvania continued accelerating the digitalization process in 2023, with a significant increase in the use of remote banking solutions offered to clients:

3.7 million unique digitized customers, approximately 15% more than in 2022, accounting for over 87% of active customers

+22% increase in the number of BT card transactions (2023 vs. 2022)

Number of payments by phone up 48% in 2023 vs. 2022

96% of transactions were initiated through digital channels



BT Pay

Launched in January 2018 as the first wallet in Romania and Southeast Europe to allow contactless payments via Visa Token Service smart payment technology, **BT Pay** saw a multitude of new features added, becoming the first banking and payments super-app in Romania.

The BT Pay app facilitates access to BT financial products and services, and contributes to behavioral change and trendsetting, to financial inclusion, and to increasing the adoption of online banking.

BT Pay helps us encourage and support fundraising through the dedicated in-app functionality, BT Pay – Donations component, where users can donate to their favorite causes. These transfers are free of charge and users can choose to support non-governmental organizations from a predefined list or any other organization.

The number of BT Pay users increased by 27% in 2023 compared to 2022 and about 60% of cards issued are BT Pay enrolled cards.



Updates in 2023

- **Open a current account using BT Pay.** The new feature replaces the trip to the bank for people who want to become customers of Banca Transilvania. Through this application, a current account can be opened at any time in a few minutes. New customers have immediate access to all the application's features and receive the digital debit card immediately in the application and then the physical card in one of the bank's units or directly at the address they chose.
- **BT Pay Kiddo**, a unique feature that meets the needs of both parents and children. Parents can request access to the BT Pay app for their children aged 14-18, while for children aged 10-14, parents can request both the BT Kiddo debit card and access to BT Pay. With BT Pay Kiddo, children have access to age-appropriate features, while parents can keep track of their children's activities and transactions through their own BT Pay app in the dedicated Kiddo section. Over 100,000 Gen Z customers enrolled in BT Pay KIDDO.
- **Wellbeing and health campaigns in the BT Pay app**
- **Travel insurance available directly from BT Pay**
- **Euro debit card issuance and currency conversion from BT Pay**
- **BT-Untold virtual card** - virtual card launched in partnership with Romania's largest festival, Untold, with special benefits for festival goers.

Apia Loan

Launched in 2022, the APIA credit continues into 2023 and addresses the needs of customers who have to make payments but cannot wait for their APIA subsidies. The funds from this credit can be used for various purposes, including the purchase of raw materials or goods, payment of salaries and utilities, settling state taxes, making payments to suppliers, and covering other expenditures. The credit is issued in RON, covering up to 90% of the expected subsidy value as per the APIA certificate, and remains valid until the subsidy is disbursed by APIA. The guarantee for the credit is the forthcoming subsidy the client is set to receive from APIA. The entire credit process, including the receipt of APIA certificates and signing of the credit contract, can be completed online for corporate clients. Individuals intending to apply online must ensure that APIA has issued the certificate and that the collection account on the certificate is with BT. The issuance of APIA credits to individuals is managed through the standard process, which requires physical presence at BT facilities.

APIA credit sales in 2023 for individual customers:

→ **Number: 2,337**

→ **Value: RON 84,511,710**

APIA credit sales in 2023 for companies:

→ **Number: 2,248**

→ **Value: RON 137,271,884**

BT chatbots

BT's chatbots (Ino, Raul) are intelligently programmed to respond quickly and accurately to customer queries, providing timely help and information on a range of topics.

[Find out more about each chatbot's capabilities here.](#)

Similarly, we are strengthening our internal operations by implementing a suite of chatbots (e.g. David, Raul Intern) dedicated to supporting our employees. These internal chatbots are strategically designed to assist staff members with various tasks and questions, streamlining internal processes and increasing productivity.

Digital solutions offered by BTFG subsidiaries

VB24

VB24 is Victoriabank's online and mobile banking platform that allows customers to remotely manage their accounts and payments and make purchases and transfers from anywhere in the world at any time.

At the same time, VB24BUSINESS, the platform for business customers, offers two types of access: informational - the user has access to the balance, transaction history, account status, and the possibility to generate electronic statements and transactional – the user can perform online operations (payments, conversions, etc.).

Updates in 2023

- Expansion of the product range via VB 24 WEB/Mobile, which now includes a current account with an attached MC Gold card, with the option of courier delivery
- Implementation of Two-Factor Authentication (2FA) for VB24
- Launch of VB24 POS application
- Launch of a WordPress e-commerce plug-in
- Ability for customers to view rates at STAR Card partners in VB24
- Launch of ChatBot Alex, which provides services such as card blocking, PIN reset, VB24 application blocking, and banking product information
- Launch of Android POS
- Launch of VB24 POS app with tax functionality

BT Mic

BT Mic provides customers with the Raul chatbot, which can be accessed via the www.btmic.ro website. Raul helps customers, whether they have a current account with BT or not, to apply online for a BT Mic loan. This facility is available from 2020. The number of potential customers applying for a BT Mic loan through Raul increased by 22% in 2023 compared to the previous year. There was also a 14% increase in the number of loans granted through Raul in 2023 compared to the previous year.

In 2023, 13,329 online member accounts were created in the Stup entrepreneurial community.



Once enrolled in the community, an entrepreneur or aspiring entrepreneur can access all Stup products and services in Stup. This requires physical interaction in Stup.

However, in three of Stup's campaigns (Pit Stop for Entrepreneurs, Pre Bank Friday, and Bank Friday), participants in Stup campaigns were able to purchase two products entirely online: eSignature and Invoicing Solution.

In 2023, the following products were sold during these campaigns:

- 273 e-signature products;
- 63 invoicing solutions.

From 2024, this option will become permanent. Members of the Stup entrepreneurial community will thus be able to purchase the electronic signature and invoicing solution required for the implementation of e-invoicing online from their accounts.

BT Direct

In 2023, we saw a significant increase in the number of customers coming through the online stream, with 7,200 customers compared to 335 customers in 2022.

In addition, 32,580 BT Direct cards were successfully enrolled into BT PAY. BT Direct cardholders enjoy a range of convenient features within BT PAY, including the ability to pay by phone, view card details, confirm payments online, check account balances, and review recent transactions.

BT Asset Management

Through BT's Internet Banking platform, BT Asset Management customers can conveniently transact via the "Buy/Sell via BT24" option. This streamlined approach has resulted in 95% of transactions, including recurring Direct Invest transactions, being completed online. The number of transactions has grown organically together with the year-on-year growth of BT Asset Management's client base. In addition, clients have the flexibility to manage their accounts online and subscribe to a weekly investment update newsletter.

The introduction and adoption of the BT One application by colleagues across the network has transformed the way BT Asset Management operates. It provides an enhanced customer experience, easier integration of all member options, streamlined processing, and support in meeting quarterly targets. Internally, the adoption of BT One has delivered significant benefits such as reduced call center inquiries, and streamlined operations with less reliance on manual processes and paper printing.

BT Capital Partners

The BT Trade (EVO) desktop trading platform and BT Trade apps for IOS and Android allow clients to enter, modify, and cancel trading orders online. The BT Trade (EVO) platform and BT Trade mobile apps also allow trading accounts to be opened online only, with account opening documents accepted directly into the platform without the need to list/sign documents. To minimize the use of paper, broker-assisted client orders are primarily taken by phone or email, with paper orders only allowed in exceptional circumstances.

	2023	2022
New contracts		
Online	81%	66%
Paper	19%	34%
Total	100%	100%
Orders		
Online	99%	98%
Personal (incl. paper)	1%	2%
Total	100%	100%
Total no. of clients		
Online	62%	57%
Assisted	38%	43%
Total	100%	100%

4.2.2 Social impact financing

BTFG's commitment to sustainable development extends beyond our efforts and actions to protect the environment to include a broader commitment to the positive social impact we can have through our lending.

Through the solutions we offer, we aim to support small businesses and finance projects that bring clear social benefits. Whether it's improving and facilitating access to education, improving healthcare infrastructure, or strengthening small businesses, our products are designed to make a real difference in the lives of communities.

Scanexpert

The local healthcare system needs high-performance imaging services, and Scanexpert's funding supports this objective, as the company is already well-equipped with medical imaging equipment (nuclear magnetic resonance, computed tomography, mammography, ultrasound, and X-ray). The company is constantly striving to continue investing in this area and provides imaging services to patients in emergency and outpatient units, with a regional presence in Iasi, Brasov, Timisoara, the Municipal Hospitals of Roman, Paşcani, the Piatra Neamţ County Hospital, and the Botoşani County Hospital, through the group company Optim Diagnostic.

Optim Diagnostic also operates a medical clinic in Botosani. To ensure that its services are widely available, the company also has contracts with health insurance companies in the areas where it operates.

BT has financed the purchase of performant equipment (CT/MRI), which will enable both classic and specialized investigations to be carried out on anatomical segments: non-invasive chronography, virtual bronchoscopy, non-invasive angiography, evaluation of pulmonary nodules, and non-invasive phlebography. With the acquisition of 3 Dual Source 256 and 384 slice CT scanners, together with dedicated image processing software, Scan Expert aims to become the number 1 in the field of cardiac imaging in Romania.

Medeuropa

Medeuropa is the local market leader in radiotherapy services and also operates internationally in France and Germany (3 clinics in each country).

Banca Transilvania financed the construction of an oncology center in Iasi and its equipment, as radiotherapy services in Romania are not yet adequately covered.

The company has 4 units in Bucharest, Oradea, Constanta, and Brasov and invested in the development of two new capacities in Iaşi and Bacău in 2023. Each radiotherapy center will have two or three LINAC machines of medium or higher capacity, while some centers will also offer brachytherapy ("internal radiotherapy").

Brancusi Medical Centre

The investment funded by BT consists of the construction of a new medical building, and a 22-bed inpatient medical center with specialist outpatient, radiology, surgery, and day hospital facilities.

This investment will allow the company to diversify the range of services it has been offering in this area since 2009, meeting the needs of the local community for easy access to comprehensive medical services (family medicine, ultrasound, gynecology, ENT, dentistry, endocrinology, psychology, dermatology, homeopathy, physio kinetics, bone densitometry, radiology, video colposcopy, diabetes nutrition, occupational medicine, cardiology, functional studies, medical analysis laboratory, etc.).

Onyx Junior Daycare and Kindergarten

We continue to finance education projects with the support of the European Union through the European Fund for Strategic Investments ("EFSI"). One of these financings is the Onix Junior Daycare and Kindergarten in Bragadiru, Ilfov County.

The investment from the BTMic loan helped building playrooms for the children, redesigning the garden and other landscaping, games, and school supplies, and invest in a new site to accommodate the growing demand.

4.2.3 Responsible employer

Banca Transilvania Financial Group boasts a team of professionals dedicated to providing high-quality financial products and services to its clients.

We value and support their dedication and commitment by implementing annual wellness programmes and projects.

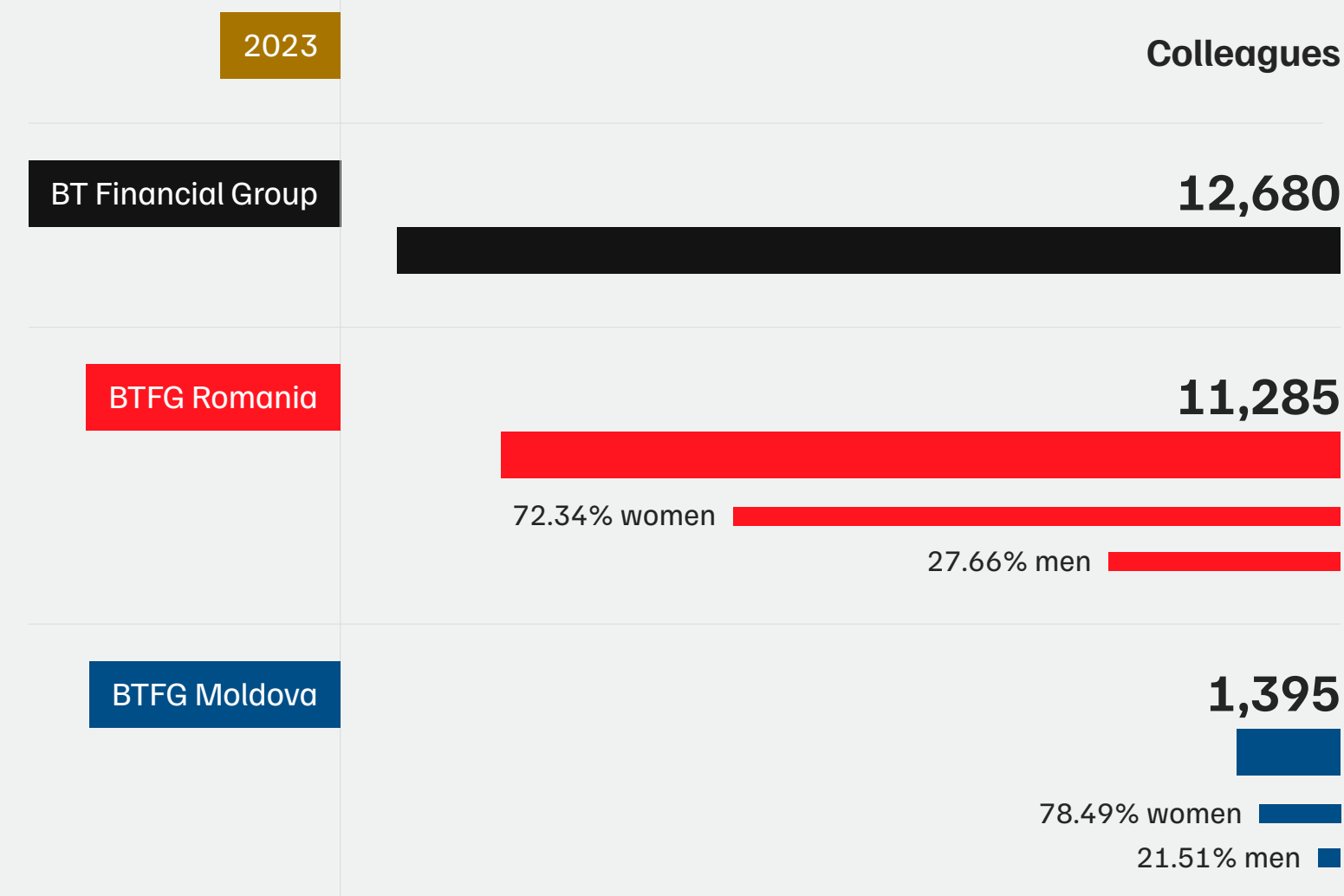
At the same time, transparent and continuous communication with our employees is a standard practice within our company, ensuring that all matters of importance to our colleagues are addressed inclusively and collaboratively.

In 2023, BT celebrated the **Year of the Colleague**, highlighting our commitment to putting people first and fostering strong collegial relationships. In October, we held an event to show our gratitude to each other.

In 2023, the BT Group team consisted of 12,680 colleagues

11,285 colleagues working in teams in Romania - 72.34% women and 27.66% men

1,395 colleagues working in teams in the Republic of Moldova - 78.49% women and 21.51% men



GRI Indicator 2-7

Dec. 31 2023

	BTFG Romania		BTFG Moldova		Total
	women	men	women	men	

Number of employees by type of contract					
Permanent	7,460	2,912	971	275	11,618
Fixed-term	704	209	124	25	1,062
Total	8,164	3,121	1,095	300	12,680

Employees by working hours					
Full time (8h/ day)	8,065	3,075	1,093	298	12,531
Part time (<8h/ day)	99	46	2	2	149
Total	8,164	3,121	1,095	300	12,680

Note: represents the number of active and inactive employees as of 31 December 2023

Within the Group, all employees have a predefined working schedule as stipulated in their employment contracts; there are no non-guaranteed hours employees.

i For consistency and comparison with data from previous years, please refer to the [Sustainability Report 2022](#).

New employees and staff turnover

There were no significant fluctuations in the number of employees during the reporting period and between reporting periods. The new employees and turnover rates are lower compared to 2022, both for BTFG Romania, as well as for BTFG Moldova.

The total number of BTFG's employees increased due to the increased level of activity which resulted in the creation of new positions. Moreover, in 2023, the Group performed an internal reorganization, both in the technical, as well as in the business and operating areas.

*The rates were calculated based on the average number of employees in 2023 = 10,348 employees

**The rates were calculated based on the average number of employees in 2023 = 1,379 employees

For consistency and comparison with data from previous years, please refer to the [Sustainability Report 2022](#).

Category	2023							
	BTFG Romania				BTFG Moldova			
	New employees		Employees who left the company		New employees		Employees who left the company	
	No.	Rate (%)*	No.	Rate (%)*	No.	Rate (%)**	No.	Rate (%)**
Gender								
women	1,088	10.51%	835	8.07%	221	16.0%	205	14.9%
men	539	5.21%	312	3.02%	74	5.4%	67	4.9%
Total	1,627	15.72%	1,147	11.08%	295	21.4%	272	19.7%
Age group								
<30	1,058	10.22%	545	5.27%	167	12.1%	124	9.0%
30-50	529	5.11%	512	4.95%	120	8.7%	133	9.6%
>50	40	0.39%	90	0.87%	8	0.6%	15	1.1%
Total	1,627	15.72%	1,147	11.08%	295	21.4%	272	19.7%
Location								
Headquarters and administrative offices	755	7.30%	479	4.63%	134	9.7%	110	8.0%
Branches and agencies in the country	872	8.43%	668	6.46%	161	11.7%	162	11.7%
Total	1,627	15.72%	1,147	11.08%	295	21.4%	272	19.7%

Third-party activities

Within the BT Financial Group companies, several workers operate on our sites but are not our direct employees. Their activities are mainly non-essential, support activities (cleaning services, security, etc.). Workers providing services to the organization are paid above the minimum wage required by national legislation, based on working hours, according to the terms of their contracts with the companies we collaborate with.

In 2023, the following activities/services were provided by third-party companies within BT as follows:

- 518 workers providing cleaning services;
- 165 workers providing security services on our premises;
- 194 workers providing security services for the transport of valuables.

At the same time, Victoria Bank employs 148 apprentices under apprenticeship contracts. The average duration of the apprenticeship contract is 1 month. Within BT Leasing Moldova there are no third-party services.

Collective bargaining agreement

Employees covered by the provisions of the Collective Bargaining Agreement 2023

	BTFG Romania		BTFG Moldova	
	No.	% of total employees	No.	% of total employees
	11,252	99.70%	1,348	96.63%

The members of the management of all subsidiaries, in line with the members of the bank's management, are not covered by the collective labor agreement, as they operate on a mandate basis.

At the BT level and its subsidiaries in Romania, employee interests are promoted and advocated by Employee Representatives. They are elected and mandated specifically for this purpose by law. Employee Representatives are elected by a vote of at least half plus one of the total number of employees/workers in the unit concerned. The notice period for dismissal for any reason is 20 working days under the Labor Code. All provisions for consultation and negotiation with employees are set out in the Social Dialogue Act and the Labor Code.

Within the Group companies in the Republic of Moldova, the notice period and the provisions for consultation and negotiation with employees are governed by the applicable legislation, internal regulations, and the collective labor agreement. The minimum notice period before the implementation of significant operational changes (closure of the unit or reduction in the number of employees) is 2 months. There is no collective labor agreement within BT Leasing Moldova.

Individuals working for BTFG under mandate contracts are not covered by the Collective Labor Agreement.

Employee representation

Within Banca Transilvania, the Regulation on the organization and functioning of the employee representatives defines the structure of the employee representatives and, at the same time, facilitates the social dialogue between the employer and the employees through the elected representatives. Drawn up in accordance with the legislation in force, the regulation aims to formalize the rights and obligations of the elected and specially appointed employee representatives, whose mission is to defend and protect the interests of the employees.

Employee representatives are elected at a general meeting of employees by at least half plus one of the total number of employees. The number of elected employee representatives is agreed with the employer in relation to the number of employees. The term of office of the employee representatives cannot exceed 2 years. Any employee of Banca Transilvania with a permanent employment contract may apply for the position of employee representative and must apply in person. Voting takes place electronically.

The last employee election took place in 2023 and involved voluntary, open applications. Employee representatives were nominated by around 4,900 colleagues. Of the total number of candidates, 7 were elected as employees' representatives.

Among their various duties, employees' representatives are responsible for negotiating the collective agreement, ensuring that employees' rights are respected, and defending employees' interests in terms of pay, working conditions, working hours, job security, and other professional, economic, and social issues related to labor relations. They also participate in the development of internal regulations. Furthermore, they play a key role in consolidating colleagues' proposals and negotiating with management representatives.

At the Romanian subsidiaries level, those that in 2023 exceeded the criterion of having 10 employees, there are 3 and 2 employee representatives, respectively, depending on the number of employees in each subsidiary.

At Victoriabank, employees' representation is carried out in accordance with the legislation in force in the Republic of Moldova, the Bank's Internal Regulations, the Collective Bargaining Agreement, and other agreements to which the Bank is part of.

Remuneration policy

Within the Group, the Staff Remuneration Policy sets out the principles of remuneration and underpins the development of remuneration policies in all Group companies. In compliance with applicable legal requirements, each subsidiary is responsible for developing its own remuneration policy, guided by the principles set out in this policy. These policies, together with any deviations, must then be submitted to the Bank's Human Resources Committee for approval.

The policy is subject to an annual review and update process or whenever the Bank's circumstances or external factors so require, in particular in cases such as changes in business strategy, business plans, the operating environment, or other significant factors affecting the Group's financial position. During this process, the achievement of policy objectives, methods of improvement, and the alignment of objectives with changes in the domestic and international banking sector and with the Bank's short-, medium-, and long-term objectives should be assessed.

The Group's main objective regarding remuneration is to comply with the principle of fairness taking into account the Group's business and risk strategy, corporate culture and values, the long-term interests of the Group, and the measures used to avoid conflicts of interest. This is achieved without encouraging excessive risk-taking and with the promotion of viable and efficient risk management. In addition, the remuneration policy ensures gender neutrality, with equal pay for all staff performing the same work or work of comparable value.

The fundamental principles of the remuneration policy within the BT Financial Group are:

- delivering long-term performance;
- attracting and retaining the best professionals;
- rewarding the level of responsibility and professional track record;
- delivering sustainable and competitive returns;
- ensuring transparency of the remuneration policy;
- respecting the interests of all stakeholders: shareholders, employees, customers, and regulators.

The remuneration policy is approved by the Board of Directors. The Bank ensures fair and competitive remuneration, strictly linked to the level of skills and performance, with two components, fairly distributed: fixed and variable.

Fixed remuneration reflects relevant work experience and organizational responsibility as defined in an employee's job description as part of the terms and conditions of employment. It is sufficiently consistent and represents a high enough proportion of total remuneration to allow for a fully flexible policy on variable remuneration components, including the option not to pay any variable remuneration component.

Variable remuneration reflects sustainable, risk-adjusted performance and the performance required to perform the duties set out in the employee's job description as part of the terms of employment. Variable remuneration is not guaranteed or automatically carried over from year to year. The mechanisms for distributing the variable component do not guarantee that amounts will be awarded over several years. Variable compensation is subject to a fair annual review process.

The ratio of the minimum wage in the company to the nationally regulated minimum wage	BTFG Romania		BTFG Moldova	
	women	men	women	men
2023	1.28	1.28	1.8	1.8
2022	1.64	1.64	2	2

	Ratio of basic salary of women to men	2023	
		Banca Transilvania	Victoriabank
The second level of management	0.88	0.92	0.87
Other management positions	0.83	0.83	0.75
Specialists - headquarters	0.85	0.81	0.94
Specialists - branch	0.89	0.85	0.94

❗ Data on the remuneration of the first level of management are detailed in the [Board of Directors' Report](#).

	2023		2022	
	Banca Transilvania	Victoriabank	Banca Transilvania	Victoriabank *
Ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual)	13.52	19.5	12.19	24.3
Ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual)	n/a	n/a	0.92	0.13

n/a = the highest paid individual in the organization in 2023 does not coincide with the highest paid individual in the organization in 2022, therefore the percentage growth rate in total annual compensation for the highest paid individual in the organization relative to the median percentage growth in total annual compensation of all employees is not relevant for calculation.

*in 2022, due to an editing error, the information on these 2 indicators referred only to Victoriabank, not to BTFG Moldova, as presented in the 2022 report.

Recruitment programmes

The selection process of candidates is carried out without discrimination based on gender, sexual orientation, genetic characteristics, age, nationality, race, color, ethnicity, religion, political choice, social origin, disability, family situation or responsibility, trade union membership, or activity. Within the Group, there are rules and procedures for recruiting and integrating new employees into the company. These apply to both external and internal recruitment. The main criteria for the selection of candidates are their match with BT's values and the requirements of the vacancy. Human Resources manages the recruitment process.

In 2023, one of the key priorities for the Human Resources department was to recruit new team members who were well-trained and aligned with the needs and spirit of BT. The desired profile included strong collaborative skills, autonomy, customer focus, and adaptability.

Several projects with an impact on recruitment/retention/engagement continued in 2023:

The BT Career Plan

The BT Career Plan has been developed to ensure predictability and transparency of BT promotion and career development opportunities. The programme operates across the BT network and the Contact Center department in the head office.

In 2023, 700 employees benefited from this programme.

BT Internship

Hai la practică, cu ZÂMBT is one of the internship programmes managed with European funds, which ran from 2020 to 2023. The programme involved 325 students (undergraduate and graduate level) from 10 university centers, as well as 325 tutors from the bank's territorial network and the Bank's headquarters. In 2023, 37 students from different university centers participated, over 1,000 applications were received and over 100 selection interviews were held.

Data Explorer: programme organized in collaboration with Babeş-Bolyai University and the Faculty of Mathematics in Cluj-Napoca, through which 5 technical students, out of 30 applicants, joined BT's data analysis teams and are still employed by the bank.

BTransformers IT - Business Analyst and QA Support

BTransformers IT - Business Analyst and QA Support are reskilling programmes for BT employees, enabling participants to learn the methods and technologies used in the bank's technical area and helping them to make a career change. The programmes have been designed to support professional reskilling in several areas

BT Primul Pass: internship programme organized for the operations team of the branch and its unit. 18 participants were selected from more than 350 applicants and about 80 interviews were held. A number of the students involved in the project will continue to work for Banca Transilvania in various capacities.

Reporting & Accounting Internship: programme organized for the Reporting and Accounting team at the Bank's Head Office. Five people were selected from over 60 students who applied for this internship. They are still employed by the Bank.

Legal internship: In partnership with the Faculty of Law of Babeş Bolyai University, we supported 8 students who interned in legal teams.

through courses offered by the Informal IT School: Business Analyst (BA) and QA Support.

There were over 230 applicants, of which 23 BT employees were selected for the programme, all of whom were transferred to the technical area.

Technical internship: 39 participants across multiple placements, 31 of whom stayed on with BT.

In 2023, a further **11 internship programmes** were carried out in the Human Resources, Marketing, Communication and PR, Legal, Governance and Non-Financial Risk Management, Corporate Governance and Litigation, General Accounting, Internal Audit, Factoring, and IT Departments. Of the 93 participants, 43 are employees of Banca Transilvania.

Internship for the Bucharest network: 53 students participated, ready to join the Front Office, Retail, and SME teams in the branches.

Professional and personal development of employees

Training and education have a significant impact, providing opportunities to develop employees' skills and abilities, thereby increasing the quality and efficiency of their work and contributing to the organization's success. Skilled and well-trained employees can carry out their tasks and responsibilities more accurately and efficiently, leading to increased organizational productivity.

Training and development shows employees that BT values their work and invests in their professional development. This can lead to increased employee satisfaction and commitment to the organization's activities. Well-trained and competent employees provide a better and higher quality service to the organization's customers and beneficiaries, leading to increased trust in the organization and an improved reputation.

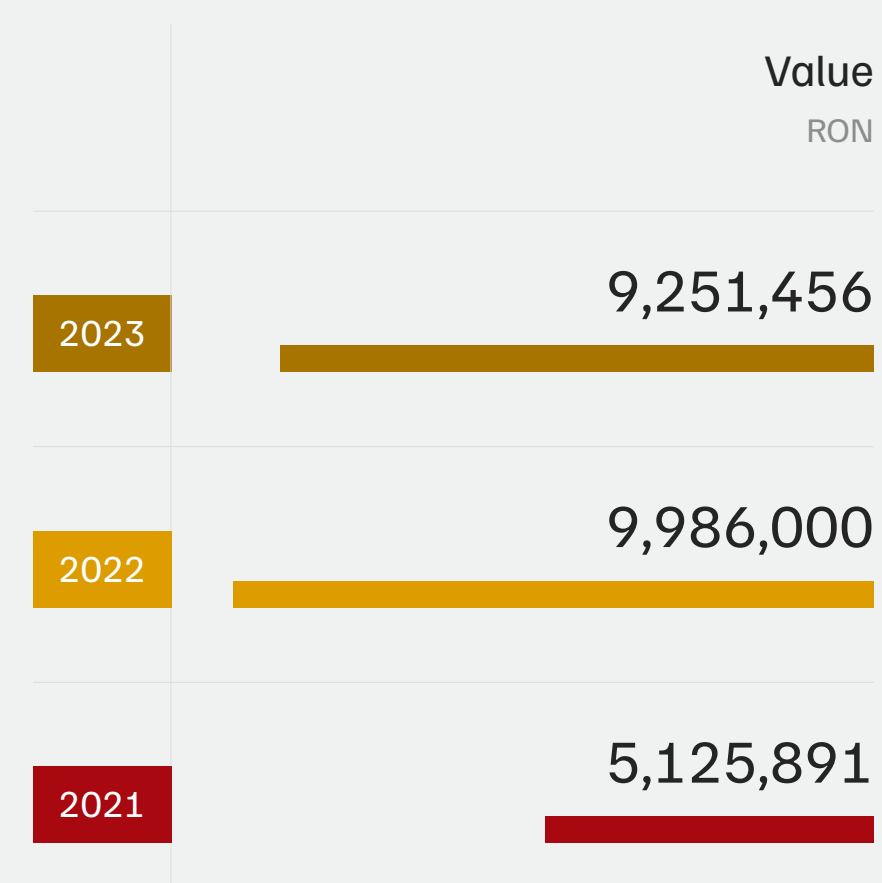
Through education and training, employees can acquire new skills and knowledge that enable them to adapt more easily to changes within the organization and the external environment. Training and education can help develop employees' capacity for innovation by encouraging them to think creatively and come up with new and innovative solutions to business problems.

Evaluation of training process and procedures

Employee feedback evaluation: Employees evaluate training programmes to determine their effectiveness in supporting their professional growth.

Evaluation of training programmes: the BT Academy evaluates the content, delivery methods, and effects of the training programme itself to see if they are in line with organizational objectives and meet the development needs of employees.

Annual training budget at Banca Transilvania level



At BT, all training programmes are designed to improve employee skills through different formats:

- **Off-the-job training** (in-class, webinars, and eLearning): This includes a range of learning opportunities such as courses, seminars, conferences, and workshops available both in person and online. These sessions aim to provide new skills and methodologies to employees, focusing on the development of management, communication, and leadership skills.
- **On-the-job training:** This method focuses on acquiring the necessary skills directly in the workplace. It provides hands-on experience and skill development directly applicable to the employee's current role, with a focus on mastering job-specific tasks.
- **Mentoring programme:** Under this approach, an experienced or senior employee is partnered with a less experienced colleague to provide guidance and support. The aim is to encourage the development of specific job-related skills through one-to-one mentoring.
- **Coaching programme:** This involves hiring a professional coach to help employees improve their skills and enhance their job performance. Coaching is particularly beneficial for improving communication, management, and leadership skills.

In 2023, there were also training sessions focused on sustainable development:

- Preventing discrimination and harassment in the workplace;
- Analysis of green credits;
- Sustainability between trend and reality.

ESG (Environment, Social & Governance) training is also of immense importance in the banking sector and is a cornerstone of sustainable and responsible banking practices. In a rapidly evolving financial landscape where stakeholders are increasingly prioritizing ethical considerations, financial institutions are under increasing pressure to integrate ESG principles into their operations. Thus, it is essential that our employees have the knowledge and skills to understand and navigate the complex interplay between environmental concerns, social impact, and corporate governance.

In 2023, 13 seminars (online and in person) were delivered to 350 colleagues. The target groups were fellow analysts, relationship managers, and site managers. The training sessions spanned 27 hours and addressed the importance of ESG risk analysis in banking.

In addition, in 2023, all employees took part in an internal competition called ESG in BT, which aimed to instill a culture of sustainability across the bank. The competition ran for six months from December 2022 to May 2023. Each month featured different themed activities to encourage teamwork, communication, and responsible behavior. For example, December focused on rewarding locations that decorated Christmas trees with recycled materials, while March and April were dedicated to park clean-ups and reforestation campaigns. In May, employees were encouraged to adopt cleaner commuting habits. Notable achievements include an 18% reduction in paper consumption and a 0.78% reduction in electricity consumption. A total of 29 internal and external actions were carried out during the campaign.

Examples of training courses for BTFG employees in Romania	BTFG Romania	
	Total hours	Number of unique participants
Preventing discrimination and harassment in the workplace	3,260	326
Collaboration	7,200	450
Communication	20,912	1,307
Sales	12,160	1,520
Financial analysis	8,784	366
Planning and organizing	13,920	870
Customer experience	3,024	378
Be the Manager	10,368	216

Within **BT Leasing Moldova**, professional training and education are included in the Internal Rules. The professional development of employees takes place following two methods: when specific training programmes or courses are considered beneficial for both the company and the employee and following the annual evaluation of employees. Staff training in mandatory programmes is conducted in accordance with an annual training plan approved by the General Manager.

In 2023, the annual training budget at BT Leasing Moldova was RON 46,264.

At **Victoriabank**, the training and education process is governed by the Staff Training Procedure. The procedure regulates the process of identifying training needs, staff awareness, and access to training programmes to continuously improve the skills and professional competence of employees.

Key objectives include:

- (a) providing the Bank's staff with the necessary skills to enhance the Bank's competitiveness and growth;
- (b) successfully integrating new staff into the Bank's operations and aligning them with the Bank's professional objectives and needs;
- (c) improving the professional skills of existing staff;
- (d) creating an environment conducive to the full achievement and development of the professional capabilities of staff.

In 2023, the annual training budget within Victoriabank was RON 1,511,674.

Examples of training courses for Victoriabank employees	Victoriabank	
	Total hours	Number of unique participants
Sales Academy	5,310	196
Impactful presentations	1,704	108
Excellence in service	1,680	210
Feedback and effective communication	1,136	142
Performance management	1,104	69
Perfecting insurance policies	927	309
Team management and building a motivated team	640	40
Be the Manager	10,368	216

Average number of training hours per year per employee by category	2023			
	BTFG Romania		BTFG Moldova	
	women	men	women	men
The first level of management	55.35	21.99	75.00	79.60
The second level of management	44.60	32.25	45.34	47.73
Other management positions	18.88	19.74	33.15	50.57
Specialists - headquarters	29.27	30.72	14.66	5.59
Specialists - branch	101.82	97.01	12.33	24.66

Note: represents the number of active and inactive employees

Comparability with the average number of training hours in 2022 is not possible because in 2023 we have integrated all BTFG subsidiaries in Romania, not only BT.

In 2023, BTFG employees received, on average:

59 hours of training/employee

In 2023, BT employees received, on average:

74 hours of training/employee,

compared to 72 hours in 2022

Performance evaluation and career development plan

In 2023, the individual criteria for assessing the individual contribution of each employee were updated, with the definition of nine competencies for each role in the organization: three core competencies common to all Banca Transilvania employees: autonomy, collaboration, and adaptation to change respectively; three competencies specific to each role family; and three competencies specific to each function. The employee performance evaluation process was further improved and updated to make it more agile and valuable for colleagues. To this end, new functionalities have been developed in the current dedicated platform.

Performance evaluation and career development plan	BTFG Romania				BTFG Moldova			
	women		men		women		men	
	No.	% of total employees by category and gender	No.	% of total employees by category and gender	No.	% of total employees by category and gender	No.	% of total employees by category and gender
The first level of management	12	100%	19	90.48%	1	100%	5	100%
The second level of management	9	81.82%	9	81.82%	48	84.21%	35	85.37%
Other management positions	493	96.10%	358	96.76%	101	80.80%	24	80.00%
Specialists - head office	2,743	87.86%	1,572	92.31%	215	66.56%	153	78.46%
Specialists - branch	3,995	88.66%	971	95.57%	326	55.35%	17	58.62%
Total	7,252	88.83%	2,929	93.85%	691	63.11%	234	78.00%

Employee benefits

At the Group level, according to internal procedures, there is no distinction between benefits granted to full-time and part-time employees. Benefits are granted to all categories of employees, without discrimination based on nationality, race, gender, color, language, social origin, genetic traits, sexual orientation, age, disability, or other aspects.

At Banca Transilvania, one of the concerns is to create mechanisms to motivate employees, to become a place where people have the opportunity to learn, grow, and feel better as a team.

Screening saves lives: a prevention programme for the most common types of cancer developed and implemented together with the Regina Maria Network of Clinics. Banca Transilvania is the only company in Romania that runs such a programme available to all its employees, and all the investigations in the programme are carried out free of charge.

In 2023, 3,520 screenings were performed, resulting in cases where cellular changes were detected and treated in time, saving lives. Additional packages have been added to the existing medical subscriptions, which are flexible and tailored to each employee's health status.

Voluntary health insurance for BT employees who have opted in has been extended to include the option of a second medical opinion and convalescence after hospitalization due to an accident or illness. Telemedicine and Top Up Protect (which includes cover for 10 major illnesses) have been added at a preferential price for employees and their families.

2023

To increase motivation, commitment, retention rate, improve the working environment, increase loyalty, health, and productivity, several projects have been implemented at Banca Transilvania in the Health & Well-being area, including:

- We continued the annual flu vaccination campaign and provided additional co-pay services: complex imaging (MRI and CT) and kinesiology and physiotherapy services at Kinetic medical clinics.
- In Bucharest, together with the Coalition of Organizations of Patients with Chronic Diseases in Romania (COPAC) and the Central Military Emergency University Hospital "Dr. Carol Davila", we organized an early detection campaign for precancerous lesions and colorectal cancer through the ROCCAS II Bucharest - Ilfov programme.
- We organized an information and awareness campaign on the importance of blood donation, launching blood donation campaigns at the Bank's headquarters together with the Bucharest and Cluj-Napoca Blood Transfusion Centers. Four blood donation campaigns were organized, with 470 employees in Cluj-Napoca and Bucharest donating almost 190 liters of blood.
- Medical Advisor visits - medical consultations at the Bank's headquarters.
- As a result of the #SafePeopleofBT pandemic project, an initiative was launched to create podcasts on various topics relevant to employees: addictions/dependencies that people can develop in certain contexts, mature women's health - menopause, how to lose weight in a healthy way, what therapy is, etc.

Programme to maintain emotional balance

The programme started in 2020 after the COVID-19 pandemic put several topics on the HR agenda, including how to help or assist in reducing anxiety and stress and identifying ways to manage problems effectively.

The following services have been added:

→ Therapy and psychological support services for issues related to anxiety, stress, etc.

→ A series of articles and advice on psychology under the Wellbeing umbrella, available on the Bank's intranet (BT Hub).

Benefits by contract type	2023			
	BTFG Romania		BTFG Moldova	
	Full-time	Part-time	Full-time	Part-time*
Medical insurance	✓	✓	NO	NO
Life insurance	✓	✓	NO	NO
Disability or invalidity protection (resulting from work-related accidents)	✓	✓	✓**	NO
Parental leave	✓	✓	✓	✓
Retirement benefits	✓	✓	✓	✓
Shares	✓	✓	NO	NO
Additional days off	✓	✓	✓	✓
Flexible working hours	✓	✓	✓***	✓
Voluntary pension plan	✓	✓	NO	NO

Loyalty bonus	✓	✓	NO	NO
Meal vouchers	✓	✓	✓	✓
Work from home	✓	✓	✓**	NO
Flu vaccination	✓	✓	NO	NO
Social assistance for events (death, birth)	✓	✓	✓	✓
Tickets for cultural events	✓	✓	✓***	✓
Football team, employee marathon	✓	✓	✓***	✓
Wellbeing programmes	✓	✓	✓***	✓

*BTLM has no part-time employees, the information refers only to Victoriabank employees

**Only for BTLM employees

***Only for Victoriabank employees

Programme to integrate parents returning from parental leave

The project is designed for BT employees who are parents returning to the office after maternity or paternity leave, and the benefit is the gradual integration of the employee after an absence of around 2 years. Parents have a flexible schedule during the first month after their return. Based on the positive feedback received after the launch of this programme and in line with the values promoted in the "Year of the Colleague", this gradual return-to-work accommodation for new parents has been maintained.

Parental leave	2023			
	BTFG Romania		BTFG Moldova	
	women	men	women	men
Total number of employees that were entitled to parental leave	8,164	3,121	1,086	300
Total number of employees that took parental leave	598	19	194	2
Total number of employees that returned to work (in 2023) after parental leave ended	449	46	0	
Total number of employees that returned to work (in 2022) after parental leave ended that were still employed 12 months after their return to work (in 2023)	231	128	0	
Return to work rate	80%	91%	53%	0%
Retention	76%	79%	74%	0%

Organizational culture and climate.

BT Employee Experience Index

To promote a working environment based on collaboration and personal development, Banca Transilvania has chosen 2023 as the "Year of the Colleague". This symbolic gesture marked the company's commitment to fostering a culture in which employees thrive, exemplifying qualities such as teamwork, support, and commitment to each other's success. A notable aspect of this initiative was the introduction of a new approach to the BT Employee Experience Index survey, allowing employees to rate their colleagues who embody the values of collegiality, collaboration, and support. In addition, this iteration of the survey rated the departments and divisions with which they work most frequently in their day-to-day tasks, and which were most responsive in helping and resolving the received requests.

The BT Employee Experience Index (BT EEI) internal survey has a bi-annual frequency and six main objectives:

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

The information obtained from the survey analysis was essential to develop specific initiatives and actions to enrich the employees' experience.

Nearly 7,763 suggestions were received. These were analyzed and decisions were taken to improve the organizational climate. Furthermore, the high participation rate of 85.5% of Banca Transilvania Financial Group employees in the survey conducted between July and August 2023 underlined the importance of this approach.

Occupational health and safety

At BTFG in Romania, issues relating to the occupational health and safety of employees are internally regulated in the Occupational Health, Safety (OHS) and Emergency Situations (ES) Regulations, which are under the responsibility of the Physical Security Division. They were developed in accordance with current legislation and updated in 2022. The Bank's OHS and ES activity is coordinated by the Deputy CEO - CRO (Chief Risk Officer) through the Occupational Health and Safety and Emergency Situations Service. At the same time, the Occupational Health and Safety Committee (OSHC), chaired by the CRO Deputy CEO, operates within the Headquarters. The Occupational Health and Safety Committee has 17 members:

- 8 employees' representatives,
- 8 employer representatives, and
- the occupational physician

The duties and operating procedures of this committee are set out in the specific legislation (G.D. 1,425/2006 art. 67) and the internal regulations.

The Occupational Health and Safety Committee has the following responsibilities:

- analyzes and makes proposals on occupational health and safety policy and prevention and protection plan, in accordance with the internal regulation or the rules of the organization and operations;
- monitors the implementation of the prevention and protection plan, including the allocation of the necessary means to achieve its provisions and their effectiveness in terms of improving working conditions;
- examines the introduction of new technologies, and the choice of equipment, taking into account the consequences they could have on workers' safety and health, and makes proposals in the event of finding certain deficiencies;
- proposes measures for the design of working spaces, taking into account the presence of groups sensitive to specific risks;
- analyzes workers' demands on working conditions
- monitors the application and compliance with the legal regulations on occupational health and safety of the measures ordered by the labor inspector;
- examines workers' proposals on the prevention of work-related accidents and occupational diseases, as well as on improving working conditions, and proposes to introduce them in the prevention and protection plan;

- examines the causes of work-related accidents, occupational diseases, and events and may propose technical measures in addition to the measures ordered as a result of the research;
- carries out its own investigations into the application of its working instructions and draws up a written report on the findings;
- discusses the written report submitted to the occupational health and safety committee by the head of the unit at least once a year, on the status of occupational health and safety, the measures taken and their effectiveness in the previous year, and the proposals for the prevention and protection plan to be carried out in the following year.

OHSC meetings are held quarterly or whenever necessary. At the branch level, a designated person is appointed for prevention and protection and training/coordination activities in the field of occupational health and safety and emergency situations. The designated person applies the instructions received from the Occupational Health and Safety and Emergency Situations Service. The Deputy General Manager CRO is also responsible for coordinating activities related to hazard identification and risk assessment for each component of the work system, i.e., the performer, the work task, the job resources/equipment, and the work environment per job/workstation.

Risk assessments are carried out by the internal occupational health and safety department by qualified personnel trained as risk assessors. The risk assessment includes measures to eliminate hazards and minimize risks. General induction training at the workplace and regular training sessions cover risks in the company and at the workplace. The risks of occupational injury and illness are assessed in accordance with the assessment method developed by the National Institute for Research and Development in Occupational Health and Safety. At the same time, it is the responsibility of each employee to immediately inform the employer and/or designated workers of any work situation that they have good reason to believe poses a risk to their health and safety, as well as any deficiencies in their protective systems.

Within BT Group companies in the Republic of Moldova, the occupational health and safety management system is implemented in accordance with applicable legislation. Risks related to occupational accidents are identified and recorded in the Occupational Accident Prevention and Protection Plan, which is approved annually by the Order of the General Manager and describes the assessed occupational risks and the technical, hygienic, organizational, and other measures necessary to ensure the safety and health of employees, as well as the human and material resources required for their implementation. The plan may be revised whenever working conditions change or new risks arise. The risk assessment methodology is developed by an external OHS consultancy. Employees and workers are instructed to report any hazards or hazardous situations to their health and safety by telephone or e-mail.

Work-related accidents	2023			
	Employees		Workers*	
	women	men	women	men
No. of fatalities caused by work-related accidents	0	0	0	0
No. of work-related accidents causing serious injuries (e.g. employee will not recover within 6 months)	0	0	0	0
No. of registered work-related accidents	2	1	0	0

BTFG Romania

* workers = cleaning, security staff

The 3 accidents consisted of one accident in the workplace - the employee tripped over an object placed on the ground - and 2 commuting accidents caused by failure to adjust speed to the weather conditions and a collision between a vehicle and an employee on a bicycle.

In 2023, no work-related accidents were recorded at the subsidiaries in the Republic of Moldova. Thus, the rates of deaths/incidents/injuries caused by work-related accidents = 0.

2023

$$\text{Rate of high-consequence work-related injuries} = \frac{\text{No. of high-consequence work-related injuries}}{\text{Total number of hours worked by employees}} \times 1,000,000 = \frac{0}{15,976,186} \times 1,000,000 = 0$$

$$\text{Rate of recorded work-related accidents} = \frac{\text{No. of recorded work-related accidents}}{\text{Total number of hours worked by employee}} \times 1,000,000 = \frac{3}{15,976,186} \times 1,000,000 = 0.18$$

Employees occupational health and safety training

The topics and training programme are prepared according to positions and risk types and include materials, training methods, and duration for:

- General induction training;
- On-the-job training;
- Periodic training;
- Periodic refresh training;
- Collective training (for service providers, visitors, etc.).

The OHS and ES training topics, i.e., general induction training, on-the-job training, periodic training, and additional training, are delivered online via the bank's e-learning platform, managed by the BT Academy, according to the training modules available on the platform.

We want to provide a healthy and safe working environment for our employees. In addition to the medical packages described in the Employee benefits section, we encourage our colleagues to exercise. They benefit from discounts on gym memberships. At the same time, a dedicated well-being page has been created on the internal communication platform, where information material is grouped into three categories: physical health/financial health/mental health.

In 2023, within BTFG Romania, 11,173 colleagues benefited from 29,200 hours of training on OHS topics.

2023

Within the subsidiaries in the Republic of Moldova, training included general introductory and on-the-job instruction, periodic semi-annual courses, and instruction on the prevention of work-related accidents/events (where applicable). At the same time, OHS training is provided to company workers (external staff - e.g. cleaning services, security). At the same time, Victoriabank's workplace managers have participated in special OHS training provided by a specialized company.

In 2023, 184 colleagues in subsidiaries in the Republic of Moldova attended 1,139 hours of training on OHS topics.

2023

4.2.4 Diversity and inclusion

Equal opportunities and treatment between women and men is a fundamental principle of human rights that is widely applied in various fields. Achieving gender equality is a key element in preventing and eliminating the social inequalities that occur in contemporary society. Gender equality refers to the social relations between individuals in both the public and private spheres.

One of the Group's priorities is to create a fair and equitable working environment, characterized by diversity, inclusion, and equal opportunities. Within BTFG, the Gender equality policy, in force since 2020, aims to:

- guide employees to understand what discrimination and harassment are, what their roles and responsibilities are, and what the procedures are if there are harassment concerns;
- correct those attitudes and behaviors that may lead to the exclusion or alienation of people of either sex and promote the benefits of building an inclusive and non-discriminatory society, in which the gender dimension is integral, to bring real benefits to the lives of all women and men and eliminate all forms of discrimination and violence;
- set out the provisions for the application of the principle of equal opportunities as regards access to employment, promotion, vocational training, working conditions, pay, and occupational social security schemes, as well as the concrete measures for implementing this principle.

At the same time, issues relating to diversity, inclusion, and equal opportunities and describing the behavior we expect from all people in our team are also included in BT Financial Group's Internal Rules and Code of Ethics and Conduct.

To reinforce our commitment to a diverse working environment, in 2023, we joined the Diversity Charter. This step underscores our dedication to embracing and promoting inclusion, ensuring all employees feel valued and respected. By adhering to the Diversity Charter, we aligned with a set of principles that guide our efforts to implement a workplace culture that celebrates diversity and promotes an atmosphere of mutual respect and understanding.

The responsibility for preventing harassment and discrimination in the workplace lies primarily with Banca Transilvania. Managers are encouraged to create a stable psycho-social climate, to constantly set a positive example through appropriate behavior and respectful attitudes, and also to establish minimum rules of politeness. Reducing work stress is also an effective way of minimizing the risk of abusive behavior in the workplace.

Average age in 2023:

- 38 years old in Romanian companies
- 34.5 years in companies in the Republic of Moldova

Employees by age, gender, and category	BTFG Romania								BTFG Moldova							
	women				men				women				men			
	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
The first level of management	0	8	4	12	0	15	6	21	0	1	0	1	0	4	1	5
The second level of management	0	5	6	11	0	8	3	11	0	48	9	57	0	38	3	41
Other management positions	3	383	127	513	1	299	70	370	13	99	13	125	1	27	2	30
Specialists - headquarters	717	2,104	301	3,122	415	1,110	178	1,703	110	183	30	323	53	85	57	195
Specialists - branches	1,072	2,975	459	4,506	253	662	101	1,016	200	372	17	589	17	11	1	29
Total	1,792	5,475	897	8,164	669	2,094	358	3,121	323	703	69	1,095	71	165	64	300

*BT Leasing Moldova branch has no employees in the category specialists – branch

Note: represents the number of active and inactive employees.

For consistency and comparison with previous years' data, please see the [2022 Sustainability Report](#).

Employees with disabilities by category	2023			
	BTFG Romania		BTFG Moldova	
	women	men	women	men
Other management positions	3	2	0	0
Specialists - headquarters	18	8	1	3
Specialists - branches	24	8	3	0
Total	45	18	4	3

For consistency and comparison with previous years' data, please see the [2022 Sustainability Report](#).

Employees in senior management positions* recruited from local communities**	GRI Indicator 202-2			
	BTFG Romania		BTFG Moldova	
	Number	% of total	Number	% of total
2023	32	96.97%	2	33.33%
2022	30	91.00%	2	18.20%

*For Banca Transilvania and Victoriabank senior management is represented by the members of the Executive Management Committee, respectively the Leaders' Committee, and for the subsidiaries by the General Manager and Deputy General Manager, who were recruited from the local communities.

**Local community = Romania, respectively the Republic of Moldova

Significant locations of operation = Romania, respectively the Republic of Moldova

All our employees have the right and are encouraged to report any perceived harassment or discrimination. There are several channels through which they can report such situations:

- direct reporting to the line manager - any manager receiving such a complaint is required to inform the Human Resources Department/designated officer in the Human Resources Department within 24 hours of receiving the complaint
- direct referral to the designated employee in the Human Resources Department responsible for equal opportunities and treatment of women and men, who will provide guidance and assistance as necessary
- through the internal whistleblower application MyAlert

In 2023, there were 2 incidents of discrimination at BT Group level, as follows:

- one complaint regarding working relations indicating a possible disadvantage in promotion. The employee was already on notice following their resignation;
- a complaint about a superior's behavior towards an employee.

Both cases were examined according to internal procedure.

4.2.5 Community investment

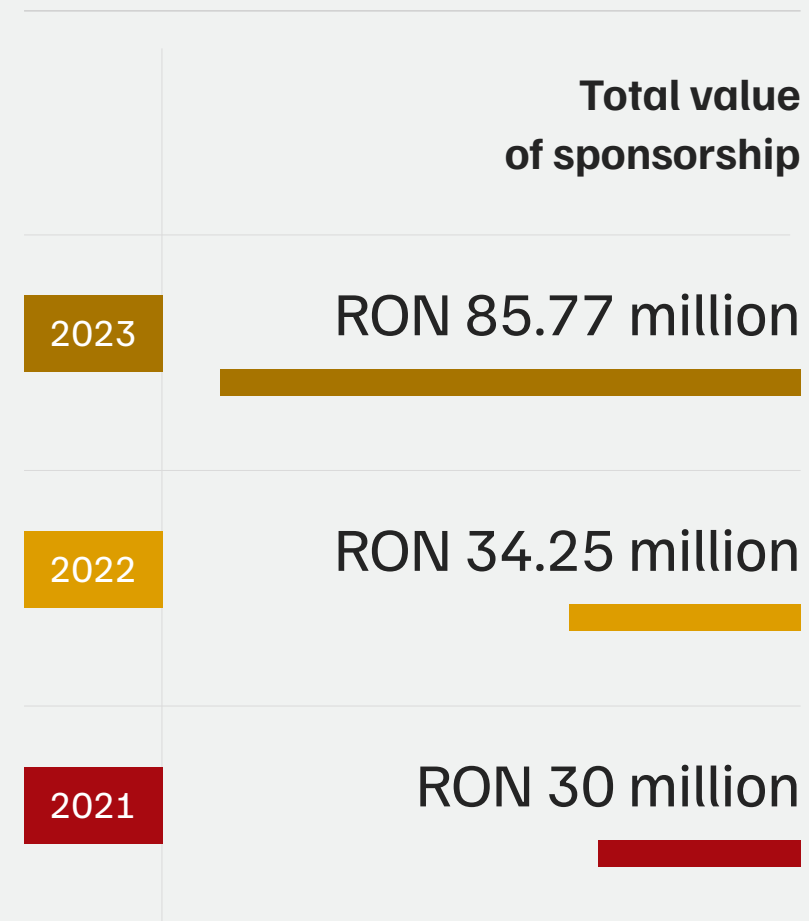
For us, community engagement is a commitment to accountability and transparency. It is our way of expressing our gratitude to and support for our community. Our involvement in social projects includes both joining national initiatives and addressing specific local needs through our extensive territorial network. At the same time, we encourage a culture of volunteering, strengthening links within our team while contributing to positive change in society.

In 2023, more than 200 colleagues participated in volunteering initiatives.

2023

The average number of hours volunteered per employee (who participated in volunteering activities) was 4 hours.

BT Financial Group



The main directions of community engagement we follow when choosing to support projects are:

Supporting the Romanian economy and entrepreneurs

Supporting elite sport activity

Supporting the cultural & artistic environment

Supporting young talents and the development of new ideas

Providing support and solidarity to disadvantaged communities

Involvement in environmental & environmental protection projects

The policies and procedures governing sponsorships are under the responsibility of the Marketing, Communication, and PR Department. The main sectors we support are cultural, artistic, educational, scientific - basic and applied research, humanitarian, philanthropic, sports, human rights protection, medical and healthcare, welfare and social services, environmental protection, social and community, representation of professional associations, as well as maintenance, restoration, conservation, and enhancement of historical monuments.

Eligible for our support are non-profit legal entities, public institutions and authorities, and public individuals residing in Romania and engaged in the above-mentioned activities. Radio and television programmes or broadcasts are also eligible, as well as activities such as the printing of books or publications in the above-mentioned fields. The Bank's branches also receive an annual sponsorship budget, which they can use for projects and initiatives with a local impact, in line with internal rules. The sponsorship thresholds and the branches that receive these funds are approved each year at the Leaders' Committee meeting.

Banca Transilvania

▶ Total value of sponsorships[†]:

RON 80 mil.

▣ Total number of projects supported^{**}:

>450

■ Total number of partner organizations^{***}:

407

BT Capital Partners

▶ Total value of sponsorships[†]:

RON 330,000

▣ Total number of projects supported^{**}:

1

■ Total number of partner organizations^{***}:

1

BT Mic

▶ Total value of sponsorships[†]:

RON 1.155 mil.

▣ Total number of projects supported^{**}:

2

■ Total number of partner organizations^{***}:

2

BT Direct

▶ Total value of sponsorships[†]:

RON 780,000

▣ Total number of projects supported^{**}:

2

■ Total number of partner organizations^{***}:

2

BT Asset Management

▶ Total value of sponsorships[†]:

~RON 300,000

▣ Total number of projects supported^{**}:

2

■ Total number of partner organizations^{***}:

2

Improvement Credit Collection

▶ Total value of sponsorships[†]:

RON 140,000

▣ Total number of projects supported^{**}:

1

■ Total number of partner organizations^{***}:

1

BT Leasing

▶ Total value of sponsorships[†]:

~RON 2.8 mil.

▣ Total number of projects supported^{**}:

1

■ Total number of partner organizations^{***}:

1

The BTFG subsidiaries BT Pensii and SALT Bank did not offer sponsorships in 2023, while the sponsorships of Idea::Leasing were not included, as the subsidiary had limited activity.

Methodology applied

*This indicator reflects sponsorship expenditure granted during the financial year 2023 to non-profit organizations and recorded in the financial statements on an accrual basis. The sponsorship is granted based on signed contractual agreements and for specific or generic causes/projects.

**The number of projects has been determined following an analysis of the sponsorship accounting breakdowns and a detailed individual analysis of transactions for each partner with which BTFG companies have entered into sponsorship agreements.

***The number of partner organizations represents the legal entities or individuals with whom BTFG companies have entered into sponsorship agreements.

Sponsorship agreements with individuals consists of scholarships and represents less than 0.1% of the total value of sponsorship offered by BT in 2023.

Our projects:

sports

cultural
events

local
community

environment



Gheorghe Hagi Football Academy – Sport Club

The Academy is the biggest football project in Romania. It requires young athletes to maintain high academic standards alongside their sporting performances. Currently, the Academy hosts around 250 athletes, organized in 13 different age groups, from 6 to 19 years old. In the first ten years of its activity, the Academy has won 24 national junior titles. In addition, it has consistently contributed to Romania's national teams with an average of over 40 players per season.

Romanian Olympic and Sports Committee

The Romanian Olympic and Sports Committee (COSR) is dedicated to the promotion of elite sport and the training of Romania's team for the Olympic Games. In addition, it coordinates and leads Romania's delegations to the Olympic Games and various international competitions sponsored by the International Olympic Committee (IOC).

Romanian Football Federation

In 2021, we started a partnership with the Romanian Football Federation, whereby we became their official bank and the main partner of their youth and junior teams. From 2023 onwards, our partnership expanded with the national football team. Also in 2023, we started a partnership with UEFA Euro Under21, with Romania hosting the tournament.

Romanian Basketball Federation

Our partnership with the Romanian Basketball Federation began in 2017, with Cluj hosting the biggest sporting event the city has ever seen - a group of the European Basketball Championship. The idea behind this partnership was to diversify our investment in Romanian basketball, positioning ourselves as the main supporter at national level. To date, our partnership with the FRB has brought significant benefits to more than 35,000 registered athletes aged 7-8.

Sport Club Association U-BT Cluj-Napoca

Our journey with basketball began in 2015, initially through our involvement with U-BT and later expanding to the national federation and national team level. As a result, BT now has a strong connection with basketball, enriched by its association with a success story. U-BT is a complex organization, comprising a wide range of junior teams and an academy, with the senior team as its main image pillar, and is the only basketball team and one of the few basketball clubs with such a professional organization.

Napoca Rally Academy

The partnership between Napoca Rally Academy and BT is a long-standing tradition, spanning more than 15 years of collaboration. The Academy drivers are active people in the community. Beyond their outstanding achievements in the National Rally Championship, they actively participate in and run numerous educational programmes, including defensive driving courses.

Romanian Gymnastics Federation

In 2023, we were partners in the 2023 World Junior Championships in Cluj. The competition brought together the best junior sportswomen from all continents. The event was unique, being the first World Gymnastics Championship to be held in our country. The championship was also broadcast on TVR, where, together with the spectators in the hall, it had a reach of 70,000 people audience.

Romanian Chess Federation

Last year we joined the "Education through Chess" programme, a national project for all primary school students in grades I-IV, organized by the Romanian Chess Federation. The programme aims to introduce chess as an optional course in public schools but also to train teachers who will deliver the optional courses.

The project reaches around 150,000 pupils, as well as teachers, their families, and the wider community, benefiting a total of around 300,000 people. The programme currently has over 200,000 participants, with an annual growth rate of 5%.

Romanian Tennis Federation

Our involvement in tennis has been constant. We support many tournaments and events that take place in our country.

In 2023, we were sponsors of the Tiriac Foundation Trophy, the only WTA (Women's Tennis Association) tournament held in Bucharest. The WTA 125 tournament brings together 32 international players and includes a doubles competition with 8 participating teams.

Transylvania Open

Our collaboration with the Transylvania Open began with the inaugural edition in 2021. Renowned for its exceptional organization, the tournament gained worldwide recognition when it earned the "World's Best WTA250 Tournament" title for the second consecutive year in late 2023.

The event achieved substantial visibility, reaching a total audience of over 9.3 million people in 2023. This includes 3.1 million viewers and over 10,000 mentions on national channels, alongside coverage in international press publications.

Sports Festival

Sports Festival is the biggest sports event in Romania. For 4 days, participants have the opportunity to try 26 sports. At the last edition, the festival attracted over 150,000 adults and children.

We are actively involved in this project because we understand the importance of non-professional sports and want to actively contribute to its promotion.

Running events:

msg Apuseni Marathon

~1,300 participants

Timisoara 21km

~1,000 participants

Via Transilvanica Marathon

800 participants

sports

Timisoara - European Capital of Culture in 2023

We joined as a main partner of the programme and supported various specific projects in the city: the Victor Brauner, Adrian Ghenie, Constantin Brâncuși exhibitions, the 1306 Plant Nursery for Timisoara, Faber - the creative and artistic center, Spontan - fun events, etc.

The programme resulted in more than 2,000 events for Timisoara, attracting more than 1.3 million participants and contributing to bringing international attention to the city.

Electric Castle Festival

In 2023, the EC festival attracted 232,000 participants over five days, of which 17,000 chose to stay in the camping area. The event included 12 stages, including the Hangar Stage by BT, the venue for the Reel Party. This event proved to be an outstanding success, securing its place as the second-largest stage of the festival. In addition, this year marked the introduction of the Kids Area by BT, a space specially designed for the children of festivalgoers.

Our long-standing partnership with the EC organizers and the prominent reputation of both brands have inspired us to deepen BT's commitment to corporate social responsibility (CSR) initiatives in 2023. Together, we set out to design a project that would bring significant benefits to both the festival community and the residents of Bontida. In line with this goal, around 100 volunteers joined an event to plant 2,000 trees. This initiative is part of a wider, multi-year plan to transform the Bonțida festival camping area into a public park accessible beyond the festival period.

cultural events



TIFF

Transilvania International Film Festival (TIFF) was the first major film festival in Romania and still remains the reference event in the cultural area. We have been TIFF's main partners since 2018. The festival is known both for the films it promotes, but also for the adjacent events and unique atmosphere.

We not only support the TIFF Cluj edition but also TIFF Sibiu, Oradea, TIFF Unlimited Caravan, White Night of Romanian Film, Sunscreen Festival, Alba Iulia Music & Film, and Gopo Awards Gala.

In 2023, TIFF Cluj sold 110,000 tickets (an 8% increase compared to 2022) and enjoyed a total of 125,000 attendees and over 100 sold-out events.

UNTOLD

BT has been a constant partner of the Untold Festival since the first edition, creating a dynamic and long-lasting collaboration marked by numerous joint projects and memorable happenings.

Untold brings together around 420,000 participants from different corners of the world.

SOS Satele Copiilor – Caravana Faptelor Bune

Caravana Faptelor Bune project addresses challenges in vulnerable communities in Sibiu County. In collaboration with SOS Satele Copiilor, we have successfully renovated a space in the town of Avrig dedicated to hosting activities for children and young people. This Resource Centre now offers a multi-purpose meeting space and a room suitable for therapy or counseling sessions, meeting the needs of both individuals and small groups.

In addition, at the Multifunctional Center in Sibiu, we have set up a library equipped with books suitable for all age groups, designed for both children and parents interested in expanding their knowledge

As part of our commitment, we offered free ophthalmology check-ups and custom-made glasses to 150 children and adults enrolled in the SOS programme, which aims to prevent children from being separated from their parents.

local community

#remesh – Ateliere fără Frontiere Association

#Remesh project is one of many projects of Ateliere fără Frontiere Association – an organization that fights for the social and professional integration of vulnerable and marginalized people in society and the workplace. Furthermore, the project gives a second chance to outdoor advertising materials that they reuse, turning them into useful products and extending the life cycle of advertising materials that have no recycling solutions. Our sponsorship covers the salary of 6 employees for one year.

Project's key figures in 2023:

- 3 tonnes of banners and advertising meshes collected during the workshop
- 6,000 m² of banners and advertising meshes collected during the workshop
- 16,000 kg CO₂ avoided from the atmosphere by reusing banners and advertising meshes
- 600,000 single-use plastic bags are avoided by reusing remesh tote bags

Little People Association – I'm OK Platform

A tele-therapy platform allowing young people and children with cancer to receive free psychotherapy & counseling sessions. The project began in 2019, and since it's start =105 people affected by cancer (patients, caregivers, and cancer survivors) have registered to benefit from the *I'm OK!* programme accessing a total of 670 therapy sessions.

Save the Children Romania

This year for Christmas, we joined the "Putan extra plate on your Christmas table" (Pune o porție în plus la masă) campaign with our partners, Save the Children Romania. Each hot meal offered as part of the campaign costs RON 20 per child. We donated EUR 50,000 to support this cause.

Hope and Homes for Children – Bursele Dar (Gift Scholarship) Project

Our collaboration with Hope and Homes for Children started in 2019. Through the Bursele Dar Project, we provided 15 scholarships to underprivileged children and young people who demonstrated exceptional talent in arts, sports, or education. Each scholarship amounts to EUR 2,000.

Peditel

Since 2021, we have provided annual support for the Peditel Association, the only free 24-hour pediatric helpline in Romania. The Association's services cater to all parents, who are offered professional medical advice for conditions that are not life-threatening to their children, at any time of the day or night.

Peditel's figures in 2023:

- 124,283 calls answered
- 685,877 minutes spoken
- 10,357 average monthly calls and 340 average daily calls



Via Transilvanica

This project includes an extensive tourist route that crosses Romania from north to south, over 1,400 km. It aims to transform (rural) tourism in Romania, provide travelers with information about the communities and their stories along the route, and promote their development sustainably and responsibly. The initiative has gained significant recognition and appreciation within the community, managing to raise EUR 1.5 million through donations, with contributions from over 3,000 individual donors and over 100 corporate sponsors.

We are committed to being a strategic partner in this project for a minimum of three years.

Afforestation actions

In parallel with our internal initiatives to improve resource efficiency and mitigate environmental impact, we want to extend our impact into the community. Through collaborative partnerships with environmental organizations, we aim to actively contribute to combating the effects of climate change at a national level.

Since 2014, we have invested EUR 366,410 in volunteering programmes dedicated to reforestation in several areas of the country.

In 2023, we supported 4 such projects with over EUR 64,000. Over 143,000 seedlings were planted, and 82 colleagues volunteered to join the planting.

environment

Non-GRI Indicator (company specific)

BTFG Moldova

Victoriabank

- Total value of sponsorships*: **~RON 265,000**
- Total number of projects supported**: **13**
- Total number of partner organizations***: **12**

BT Leasing Moldova

- Total value of sponsorships*: **~RON 8,300**
- Total number of projects supported**: **3**
- Total number of partner organizations***: **2**

Methodology applied

*This indicator reflects sponsorship expenditure granted during the financial year 2023 to non-profit organizations and recorded in the financial statements on an accrual basis. The sponsorship is granted based on signed contractual agreements and for specific or generic causes/ projects.

**The number of projects has been determined following an analysis of the sponsorship accounting breakdowns and a detailed individual analysis of transactions for each partner with which BTFG companies have entered into sponsorship agreements.

***The number of partner organizations represents the legal entities or individuals with whom BTFG companies have entered into sponsorship agreements.



In our branches in the Republic of Moldova, our community involvement strategy focuses on three pillars:

- culture
- sport
- family

Through the projects we implement, we aim to support the local communities in which we operate, contributing to improving the quality of life by promoting sports and culture.

At the same time, we show our solidarity towards the people around us through specific interventions, depending on the context, the needs of the population, and the requests we receive from non-governmental partners.

our projects

The Republic of Moldova's Basketball Federation

Victoriabank is in solidarity with Moldovan athletes, financially supporting the activities and plans of the Republic of Moldova's Basketball Federation, thus becoming its main partner. The bank is committed to supporting teams in all divisions, including both women's and men's leagues, as well as junior and senior categories.

Our contribution: RON 64,250

Run Moldova

The Run Moldova Association aims to promote a healthy and active lifestyle. The members of this community are amateur and professional athletes who compete in various types of sports, with a focus on running and trail running. Run Moldova seeks to promote an active way of life by supporting and organizing sports events available to the general public, including competitions, running camps, and other activities. The 2023 event has been divided into 4 categories: Marathon at Fetești, Golden Dragon Marathon at Orheiul Vechi, Run Home at Taraboste, and Dante Hell Ultra Suruceni.

Our contribution: RON 20,560

The Choral Music Association in Moldova

In 2023, we supported the event Small Country - Big Song: Summer Edition, organized at the Green Theatre by the Musical-Choral Association Moldova. The event presented a 100% made-in-Moldova musical product with a concert repertoire inspired by the 60's - 80's, a golden period that was marked by the rise of composers, soloists, and lyricists who created unique full of originality and artistic expression. The concert brought back valuable, forgotten songs that were discovered in the vinyl collections of music lovers in Chisinau.

Our contribution: RON 15,420

The Generosity Gala

Since 2014, we have been supporting the Generosity Gala, the largest charity event in Moldova, run by the non-profit organization Child Community Family (CCF). The Generosity Gala is not just an event, but a movement. A movement that brings people together to make a meaningful difference in the lives of children who need it most. The money raised at the gala went towards the educational inclusion programme for children with special needs, as well as family support to prevent children from being separated from their families.

Our contribution: RON 45,489

Genesis Art Theatre - Let's go to the Theatre

Victoriabank has been supporting the Geneza Art Theatre in Chisinau since 2021. Geneza Art, an independent theatre in the Republic of Moldova, focuses primarily on promoting emerging talent and selecting repertoire that is both accessible and authentic, reflecting the diverse range of emotions and scenarios that life presents.

Our contribution: RON 51,400

At the same time, throughout 2023, we supported various institutions, organizations, and causes with almost 80 pieces of electronic equipment.

4.3 Business ethics and responsibility

4.3.1 Ethics and Code of Conduct

Business ethics and responsibility are fundamental principles that guide organizations in their interactions with stakeholders and society at large. Adherence to ethical standards requires making decisions that prioritize integrity, fairness, and honesty in all business practices. It also involves recognizing the impact of business activities on various stakeholders, including employees, customers, suppliers, and the community. Within the Group, several policies and procedures govern our business conduct. [BT Financial Group's Code of Ethics and Conduct](#) is designed to communicate to all stakeholders (shareholders, management, employees, customers, suppliers, and other parties) the values and principles to which employees and members of the governing bodies of the Group's companies adhere. The Code is in line with the ethical and professional standards promoted within the institutions of the financial banking system through the guidelines and codes developed by the professional associations to which BT Financial Group companies are members.

The Code also covers other aspects of ethical business conduct, including supplier relations, political activities, avoiding conflicts of interest, fair competition, human resources policy, and the conduct of employees and the Management Body.

All employees and members of the Group's Management Body are required to be aware of and comply with the provisions of the Code. Any deviation from the Code will result in disciplinary action. This Code does not supersede the Internal Rules of Procedure (ROI) or the Rules of Organization and Administration (ROA) of the Group companies. The ROI and/or ROA are comprehensive documents that set out the work of each BT Financial Group company and their territorial units, including human resources provisions.

Policy on anti-competitive behavior

We are a representative pillar of the Romanian banking system, therefore fair competition and conduct characterized by honesty, integrity, and transparency are essential elements integrated into the Code of Ethics and Conduct of GFBT. 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 Director of Corporate Governance and Litigation Division. The company can sanction employees both for their violations and for non-reporting violations of other employees.

Victoriabank prohibits any activities that endanger healthy and fair competition on the relevant market in the Republic of Moldova. The Bank has stipulated rules of market conduct in its Code of Conduct and Competition Compliance Policy. The Bank's policies in this regard were communicated to all employees and members of the governing bodies.

In 2023, there were no legal actions regarding anti-competitive behavior and antitrust and monopoly violations in which Banca Transilvania Financial Group companies were identified as participants.

Note: In 2022, an incident subject to a competition investigation, which concerned the entire leasing sector in Romania – not particularly the anti-competitive behavior of our employees - was still ongoing. Thus, by Order of the President of the Competition Council no. 1,149/20.11.2017, the Competition Council launched an investigation regarding the possible violation of Art. 5 paragraph (1) of the Competition Law no. 21/1996 and of Art. 101 paragraph (1) of the Treaty on the Functioning of the European Union by the Association of Romanian Financial Companies, the Federation of Romanian Financial Services Employers, the Romanian Leasing and Credit Employers, the IFN Credit Employers, their members, and Diplomat Consult S.R.L. on the financial leasing services and consumer lending markets. Following these investigations, the Group's subsidiary – BT Leasing Transilvania IFN S.A., as a member of the Association of Romanian Financial Companies – ALB, was sanctioned (fine value = 4.327.255,22 lei) along with 15 other member companies for violating competition law by participating in commercially sensitive information exchange. This case is currently being challenged before the Bucharest Court of Appeal, under the provisions of Law 21/1996 on competition, and is being heard on the merits (Case no. 3,158/2/2021).

At the same time, following the acquisition of Țiriac Leasing IFN SA by BT Leasing Transilvania IFN, we also took over case no. 3201/2/2021, which concerned the same type of incident presented above. Țiriac Leasing was fined RON 2,898,688.16. Currently, this case is also being challenged before the Bucharest Court of Appeal, under the provisions of Law no. 21/1996 on competition, in case no. 3158/2/2021.

2023

Conflicts of interest

Conflicts of interest and the way they are managed are governed internally by the Policy on the Prevention and Management of Conflicts of Interest. This policy aims to establish, implement, and maintain effective criteria in identifying current and potential conflicts of interest, by identifying the Bank's relationships, services, activities, or transactions in which situations of conflict of interest may arise, as well as how to report and manage them.

It is mandatory for all employees and members of the management structures to comply with the provisions included in this policy and to inform the Compliance Department of any situation that could represent a potential conflict of interest. At the subsidiaries level, the conflict of interest prevention and management process requires internal regulations specific to each subsidiary, which are reviewed by the Compliance Department. At the same time, they regularly and occasionally report potential conflicts of interest to BT at conflictinterese-conformare@btrl.ro.

Cross-board membership is communicated to stakeholders through transparency or annual reports on the organization and operation of the bank.

Reporting mechanisms

At the BT Group level, the reporting process of internal regulations/legal provisions violations or irregularities within the bank and its subsidiaries is described in the Warning Procedure designed to ensure an appropriate framework for the management of Banca Transilvania Financial Group's activities. The objectives of the procedure are, among others, to provide support for the internal warning mechanism, which can be used by BT Group employees to communicate legitimate and significant concerns regarding the management framework of its activity and to encourage the reporting of behaviors/situations that may have serious consequences for BT Financial Group, while ensuring the confidentiality and security of employees who report risk situations for the bank/subsidiaries and avoid repercussions for them.

The reporting channels available to employees are:

- myalert@btrl.ro – dedicated e-mail address
- **My Alert** – internal application

Shareholders and investors can submit complaints, grievances, and claims by e-mail to investor.relations@bancatransilvania.ro, as well as through the alternative channels available on the Bank's website. For other stakeholder categories, reports/complaints are registered via the BT call center.

In addition, a dedicated e-mail address for ESG complaints has been created - sesizariesg@btrl.ro.

The Corporate Governance and Litigation Department will prepare a summary analysis of all recorded alerts and investigated incidents at the BT Group level as follows:

- Annually, to the Board of Directors in the first quarter of the following year, which will approve the annual report and, if necessary, take the necessary action for the entire BT Group;
- Quarterly, to the Leaders' Committee;
- Whenever appropriate, to the Executive Management Committee - in the case of high-priority alerts and incidents that could seriously affect the Group's reputation;
- Whenever necessary, to the National Bank of Romania - Supervision Division, in case of legitimate and substantial concerns that may affect the safety, soundness, and reputation of the Bank.

In 2023, 20 complaints were registered through specific reporting channels, of which 5 concerned misconduct/unethical behavior (4 from employees and 1 from a shareholder).

All complaints were investigated and resolved according to internal procedures.

2023

Political contributions

At the BT Group level, the policy on engaging in political activities and causes is described in the BTFG Code of Ethics and Conduct. BT Financial Group companies will avoid any form of engagement in politics in the normal course of business; at the same time, they will avoid associating the BT Group's image with any kind of political choice or activity through direct or indirect endorsement or involvement.

The involvement of any employee/member of the Management Body of a BT Group company in political activities may only be done with the prior approval of the designated competent structures of each company.

In the normal course of business, BT Financial Group companies will not grant any special facilities or conditions to political parties, political organizations, or politically exposed individuals; business relations with politically exposed individuals will strictly comply with the provisions of the national (Law 129/2019) and European regulatory framework.

BT Group companies do not and have not supported political causes or parties.



Compliance with legal regulations

Compliance with current legislation is a key concern for us and an important factor in maintaining the trust that millions of customers and shareholders and all other stakeholders have granted us.

We operate in strict compliance with all applicable national and international regulations.

In 2023, there were no environmental fines or penalties.

2023

Penalties and fines for non-compliance with laws and regulations on the provision and use of financial products and services		2023		2022		2021	
		Banca Transilvania		Banca Transilvania		Banca Transilvania	
Fines	Number	5		12		8	
	Financial value* RON	63,500		109,500		13,000	
Non-financial sanctions/ Warnings	Number	3		3		6	
Cases submitted through alternative dispute resolution mechanisms	Number	184 (of which)		286 (of which)		272 (of which)	
		CSALB = 118	BNR = 66	CSALB = 222	BNR = 64	CSALB = 206	BNR = 66

*amount actually incurred

At the same time, at the level of Victoriabank, the Decision on the Contravention Case No. 223 Series DPN 01 of June 27, 2023 was issued, based on the complaint filed by the citizen Țurcan Dragoș and based on the provisions of the Report on the Contravention of May 24, 2023 No. 000424, the investigator found the violation of the provisions of Article 11 of Law 202/2013 on Credit Agreements for Consumers (information on the interest rate related to the credit) and the provisions of Article 344, par. 4, lit. d) of the Contravention Code of the Republic of Moldova, which incriminates actions consisting of - "Violation of the requirements of the legislation on consumer credit agreements by failing to inform about any change in the interest rate on the credit before the change comes into effect". According to the issued decision, Victoriabank was sanctioned with a fine amounting to MDL 20,000, with the possibility to pay half of the amount. The bank paid MDL 10,000.

Litigation for non-compliance with social and economic laws and/or regulations	Banca Transilvania		
	2023	2022	2021
Legal actions in progress**	355	336	766
Legal actions concluded***	132	199	482

Note: The actions represent litigations regarding potentially abusive clauses, various claims, enforcement appeals, payment claims, actions on the conversion and stabilization of the exchange rate of loans granted in foreign currency, requests for non-credit banking operations as well as other various categories.

In 2023, the disputes won in favor of the Bank represented approximately 74% of the total, in 2022, 73%, and in 2021, 77%. For cases relating to currency stabilization, challenges to enforcement, debt enforcement, and claims, the success rate in 2023 was approximately 78%, in 2022 - 74%, and in 2021 - 76%.

2023

**of which, in 2023, 33 Non-Credit/Operations disputes and 322 disputes arose from credit agreements; in 2022, 17 Non-Credit/Operations disputes and 319 disputes arose from credit agreements; in 2021, 78 Non-Credit/Operations disputes and 668 disputes arose from credit agreements

***of which in 2023 60 Non-Credit/Operations disputes and 72 disputes arose from credit agreements; in 2022, 47 Non-Credit/Operations disputes and 152 disputes arose from credit agreements; in 2021 26 Non-Credit/Operations disputes and 456 disputes arose from credit agreements

4.3.2 Anti-corruption and anti-bribery measures

At the BT Group level, the Anti-Bribery and Corruption Policy (ABC 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. The ABC policy has been developed taking into account, inter alia, current national legislation (e.g. criminal code, criminal procedure code), but also various global standards and conventions, such as the United Nations Convention against Corruption or the OECD Guidelines for Multinational Enterprises.

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.

Therefore, any of the following activities are strictly prohibited:

- receiving money or other benefits from customers or third parties for performing job duties or for influencing an employee/manager to perform or not to perform a job duty;
- paying or offering a benefit for the violation of laws or of internal regulations;
- paying or giving a benefit to "secure" a business.

All management team - together with employees - have access to and are informed of BT Financial Group's policies in this area. Specialized departments are trained and assessed on the standard of knowledge of these topics. In addition, when the regulatory framework in this area is updated, the relevant individuals are informed and provided with the relevant rules.

At the subsidiaries level in the Republic of Moldova (Victoriabank and BT Leasing Moldova) both the Group's Code of Ethics and Conduct and internal policies and procedures are applied. Victoriabank has implemented its own anti-corruption policy whereby it has adopted and promoted the principle of "zero corruption tolerance" in all its business relations. All members of the governing bodies at all levels, together with the employees have access to and are informed of these policies upon their adoption, including any changes that occur during their validity. In addition, upon hiring, all employees sign a written commitment to comply with the anti-corruption requirements described in the related policy and Code of Conduct. Victoriabank's position on this phenomenon is communicated to partners by integrating an anti-corruption clause in all collaboration contracts. Also, before the conclusion/amendment of collaboration contracts, controls are performed to verify/ensure compliance with anti-corruption standards.

In 2023, at the level of Banca Transilvania Financial Group:

- there were no confirmed incidents of corruption involving BT Group companies' employees leading to their dismissal or disciplinary action;
- there were no confirmed incidents of corruption leading to the termination or interruption of cooperation with business partners;
- there were no legal actions relating to corruption brought against BT Group companies or their employees.

Training and information on anti-corruption policies and procedures

Note: the number of people informed/trained on anti-corruption policies and procedures includes employees who participated in such information/training but left the company by December 31, 2023. Therefore, in some cases, the percentage may exceed 100%.

Training and/or information on anti-corruption policies and procedures

2023

BTFG Romania

Category	Number of persons informed about anti-corruption policies and procedures	Number of persons trained on anti-corruption policies and procedures	% persons informed about anti-corruption policies and procedures out of the total number of employees in each category*	% persons trained on anti-corruption policies and procedures out of the total number of employees in each category*
Leaders' Committee (BT)	7	7	100%	100%
Management Body (for subsidiaries in Romania)	28	28	107.70%	107.70%
Executive Managers	21	21	131.25%	131.25%
Division Managers	151	147	90.42%	88.02%
Regional Branch Managers	43	41	97.70%	93.18%
Employees-Headquarters	4,877	4,597	92.97%	97.63%
Employees-Network	6,058	5,656	104.83%	97.87%

Victoriabank

Executive Managers	5	1	100%	20.00%
Division Managers	38	25	118.75%	78.13%
Regional Branch Managers	2	1	100.00%	50.00%
Employees-Headquarters	490	381	86.12%	66.96%
Employees-Network	560	339	75.68%	45.81%

Corruption risk assessment

Based on the significant risk areas identified, the Group applies specific mitigation measures to prevent any possible negative impact. The in-depth and risk assessments undertaken are supported by enhanced due diligence measures such as:

- approval of the business relationship for customers within the high and very high risk categories at a senior management level within BT;
- management approval for the granting of high-risk products to customers within the high-risk category;
- ongoing monitoring of customers/transactions, according to the level of risk assigned, to determine whether transactions are current and consistent with customer information and business profile.

As regards the activity of Banca Transilvania and Victoriabank, as well as other subsidiaries such as BT Capital Partners, BT Leasing, BT Asset Management, 100% of the transactions carried out are monitored for money laundering (AML - Anti Money Laundering), the act of corruption being considered a predicate offence for money laundering.

100% of operations were assessed for corruption risks by monitoring transactions and the reputational profile of clients. During the reporting period, no high corruption risk areas were identified, other than those listed on the FATF (Financial Action Task Force) reputational/offshore/tax haven lists, which are taken into account as a high risk factor in client classification or transaction monitoring.

4.3.3 Data protection and cyber security

Information security and personal data protection are fundamental concerns for the financial and banking sectors, both from a social and economic perspective. Companies in the banking industry operate and have access to a large amount of personal information about their customers (financial records data, identification data, etc.). Inadequate protection of this data can lead to identity theft, fraud, and other financial crimes, sometimes with significant community-wide effects. Beyond the negative consequences for the rights and freedoms of data subjects, incidents involving IT systems can also have serious financial and reputational consequences for BT: loss of revenue, fines, penalties, or damage to the company's reputation, all with a significant impact on economic performance.

Banca Transilvania, as well as each BTFG entity, has developed internal regulations to ensure adequate processing and protection of personal data, as well as information to data subjects in compliance with the applicable legal provisions in this area (e.g. Privacy Policy), made available to the general public via the website of each Group entity.

[The BT Privacy Policy can be found here.](#)

There is also distinct information on the processing and protection of personal data about employees of BTFG companies made available to employees/potential employees on the bank's website.

General (e.g. for customers) or specific information notes for specific processing operations are also made available to data subjects within these policies or, where appropriate, outside those, to ensure transparency when processing personal data.

Furthermore, the bank and the BT Group entities have implemented a series of internal regulations to ensure compliance with the legal provisions on the processing of personal data, as well as with the provisions that require ensuring adequate security of personal data that is also information subject to professional secrecy in the banking financial field.

The main internal regulations relate to:

- General rules on the processing and protection of personal data within the activity of each entity in the BTFG
- Procedures on the management of security incidents and personal data breaches, respectively
- Procedures regarding the regular training of employees of BTFG entities in the field of personal data processing and protection
- Strict rules regarding the obligations of BTFG entities' employees to maintain the confidentiality of personal data and information subject to professional secrecy
- Regulations on the management of applications by which the data subjects exercise their rights provided by the GDPR
- Rules on personal data processing in direct marketing activity
- Procedures on the management of relations with contractual partners of the BTFG entities regarding the processing and protection of personal data
- Procedures to establish the need to develop, implement, and approve an impact assessment on the protection of personal data (PDIA)

- Regulations on the preparation and record-keeping of personal data processing activities, as well as for the identification, analysis, and management of risks related to personal data processing activities
- Strict rules on information security, including ensuring access, access, and control of access of employees and collaborators to information in the IT network of BTFG entities, access, and remote work
- Regulations and measures regarding information categorization
- Anti-virus measures and policies
- Information security policies regarding the acquisition and development of IT solutions, as well as for IT system updates
- Logging/journaling, backup, and archiving procedures and measures
- Business Continuity Plans and procedures and disaster recovery plans
- Procedures and measures to ensure physical security in the premises and equipment of the Bank and/or other entities in the BTFG

Employee training on the processing and protection of personal data is carried out in accordance with the Procedure for the organization and testing of BT Financial Group employees on processing and protection of personal data (for BT and the subsidiaries that have Group-appointed DPOs - BT Capital Partners, BT Asset Management, BT Leasing Transilvania, BT Direct, BT Mic, ICC). The other entities in the Group appointed an entity-level DPO.

	Non-GRI Indicator (company specific)		
	BT Financial Group		
	2023	2022	2021
Total training hours attended by employees on personal data protection	35,706	36,820	22,500

The indicator represents total training hours for data protection (GDPR) trainings attended by employees (active and inactive) during the financial year 2023. The indicator is an extract from the information used to determine the indicator GRI 404-1 Average hours of training per year per employee, by filtering those trainings specific for GDPR. The indicator includes data for BTFG.

At the Bank and other entities of the BTFG level, requests were mainly registered whereby data subjects exercised various rights provided by GDPR (access, opposition, deletion, rectification, etc.). In some cases, reports/complaints were also received related to customer suspicions regarding unauthorized access and/or disclosure of confidential information. The status of the two categories of requests/notifications/complaints resolved in favor of the customers/data subjects is presented and broken down next.

*With regard to the Exercises of rights provided for in the above-mentioned Regulation, settled in favor of the data subjects (also includes exercises of rights regarding data processed in the Credit Bureau's records). Part of the cases recorded in the internal systems as Settled in favor of the customer are situations in which, although not considered justified by the Bank, an attempt has been made to offer a solution to the customer.

**Investigation notices represent information requests sent to the Bank/ other entities of the BT Financial Group by this authority, as the case may be, as a result of submission by the Bank/entities of the BT Financial Group of personal data breach notifications according to art. 33 GDPR, receipt by the authority of complaints from data subjects by which they claim the improper processing/protection of their data by BT/other entities of the BT Financial Group, receipt by the authority of notifications from third parties regarding non-compliant data processing/protection of persons concerned by BT/other entities of BT Financial Group.

***ANSPDCP = National Authority for the Supervision of Personal Data Processing

Settled in favour of the client does not necessarily imply a mistake by the bank, but the solution offered to the client includes a commercial offer, a repair of a damage, correction of an error or subsequent actions to modify a product/service/flow, apology. If the customer complains about more than one issue, or the solution offered in response includes more than one issue, both in favour of the bank and in favour of the customer, the persons designated in point 1.3.1 will be able to decide the appropriate framing.

Data for 2022 and 2021 have been updated according to the new classifications.

Total number of complaints received	Banca Transilvania		
	2023	2022	2021
Complaints received from third parties and considered substantiated by the organization *	3,248	3,116	4,790
Reports/complaints regarding unauthorized access/disclosure of personal data/confidential information resolved in favor of customers/data subjects	1	2	5
Complaints received through the Alternative Banking Dispute Resolution Centre (CSALB)	136 of which 72 settled in favour of the client	75 of which 66 settled in favour of the client	59 of which 52 settled in favour of the client
Complaints received via ANPC	15 of which 6 settled in favour of the client	10 of which 9 settled in favour of the client	7 settled in favour of the client
Investigation notices** received from ANSPDCP ***	1	3	3
Complaints received via BNR	1	2 of which 1 settled in favour of the client	1

In 2023, at Banca Transilvania, the number of complaints resulting in requests resolved in favor of data subjects, whereby data subjects exercised their rights regarding the processing of personal data was 3,248, a 4.24% increase over 2022.

For the other entities of the Group, the breakdown of complaints concerning the exercise of such rights is as follows:

- BT Direct
900 complaints were registered and resolved in favor of the data subject;
- BT Mic
19 complaints were registered and resolved in favor of the data subject;
- BT Asset Management
18 complaints were registered and resolved in favor of the data subject;
- BT Capital Partners
5 complaints were registered and resolved in favor of the data subject;
- Salt Bank
17 complaints were registered and resolved in favor of the data subject;
- Subsidiaries in the Republic of Moldova
no complaints were registered concerning the exercise of rights relating to the processing and protection of personal data.

In 2023, at Banca Transilvania and the other entities of BTFG in Romania and the Republic of Moldova, no loss, leakage/theft of personal data likely to put data subjects at risk was reported.

2023

2023

Information security

All internal regulations on information security at the level of Banca Transilvania are developed in accordance with the ISO 27001 standard, and the Information Security Management System is developed in accordance with these requirements. Responsibilities in the information security area are assigned to a dedicated department, subordinated to the CRO (Chief Risk Officer), which has the following organizational components:

- Cyber security
- Vulnerability management
- Information and security governance
- Digital identity management

For secure online payments via 3DS, SCA e-Commerce, at POS via SCA POS, the Bank complies with Strong Customer Authentication standards, part of the European PSD2 payment services directive. Banca Transilvania is ISO 9001:2015 certified for POS card payment activities (software applications, assisted, unassisted, or virtual payment terminals) and E-commerce activities. Access to banking applications - BT Pay, NEO, BT24, and BT Visual Help, is done securely, in compliance with high-security standards. Cards added to the BT Pay app and other wallets (Apple Pay, Google Pay, Fitbit Pay, Garmin Pay) are tokenized. BT-issued cards also comply with internationally regulated security standards of Visa/Mastercard payment schemes.

Furthermore, we have a dedicated section on the Bank's website outlining the measures we implement to ensure the security of our customer's business, providing steps to follow and useful tips for:

- How we protect you
- Trending
- Shopping safety
- Safety when using BT apps
- Communication safety
- Types of fraud
- First aid kit
- Online safety for entrepreneurs
- ATM safety
- How to avoid phishing attacks

There is also a quick [Quiz](#) to help people find out how prepared they are to avoid online and phone fraud.

	Banca Transilvania		
	2023	2022	2021
Total training hours attended by employees covering information security topics	10,298	8,964	6,900
Total training hours attended by employees covering phishing, security vigilance, incident management, or email dangers	20,169	18,353	18,060

At Victoriabank, information security assurance processes are described in the IT/SEC Policies and Procedures. The Information Security department is in charge of collecting security events from all systems and network equipment, alerting and preventing leakage of confidential information, marking and classifying digital information/ documents as well as vulnerability scanning solutions, etc. The Information Security department manages the following information security management solutions - SIEM QRadar (collection of security events from all systems and network equipment); DLP (Data Lost Prevention) - alerting and preventing leakage of confidential information; Titus (application allowing marking and classification of digital information/documents); Antivirus; Nesus (vulnerability scanning solution) etc. In 2023, Mail Gateway Fortimail and FortiSanbox, Web Gateway commercial solution, WAF F5 (Web Application Firewall) were implemented.

As of December 31, 2023, it was concluded that the TIC Risk Profile is assessed as Low Medium (2). Thus, the Bank's TIC risk exposure in 2023 compared to 2022 remained constant with some small deviations. This can be explained by the fact that although the Bank has addressed a large part of the risks identified in 2021, with the implementation of new technologies and organic changes that occurred during 2022, new TIC risks were generated and identified. Considering the continuous development required by current circumstances, it is considered that the Bank has managed to maintain its overall TIC risk profile within acceptable limits throughout the reporting period.

4.3.4 Business continuity

Banca Transilvania, Romania's largest bank by assets, customer base, and range of banking and non-banking services, recognizes the risk of significant business disruption and has implemented a comprehensive Business Continuity Management (BCM) programme. This programme, which includes BCM and Crisis Management (CM) frameworks, takes an all-risks approach to ensure the Bank's resilience. The Executive Director - Information Security, Technology, and Operations Framework - oversees this responsibility, and the Business Continuity Directorate, Business Continuity Ambassadors from various departments, and input from the business/IT departments ensure business continuity.

The Bank's business continuity strategy is designed to detect, prevent, respond to, recover from, and learn from operational disruptions, aiming to maintain essential service delivery and ensure employee safety in line with legal and internal continuity standards. This commitment to business continuity facilitates informed risk management, maintains service availability, enhances controls for severe impact scenarios, and ensures regulatory compliance.

Banca Transilvania's BCM programme requires a Business Impact Analysis (BIA) and Risk Assessment (RA) to identify critical processes and recovery strategies for different disruption scenarios. The programme details procedures for relocation or resumption of operations, with each core business and infrastructure function developing and maintaining Business Continuity Plans (BCP) based on predefined strategies and roles. These plans are reviewed, updated, and tested annually and cover critical and important systems to ensure continuous and reliable service.

In support of the BCM programme, the bank also maintains technical disaster recovery plans for its critical business operations, hosted primarily in Cluj-Napoca, with alternate sites and recovery solutions in the event of major incidents. BCM's framework includes a clearly defined crisis management process that is regularly tested to effectively manage business disruptions.

The effectiveness of the programme is regularly audited by internal and external bodies and regulators, demonstrating Banca Transilvania's commitment to protecting its staff, ensuring the continuity of critical business processes, and supporting customer trust and financial market stability.

4.3.5 Supplier relations

Within the BT Group, the procurement process is internally regulated by the Rule and Procedure for the procurement of works, goods, and services in Banca Transilvania, updated and amended in 2023 and 2021 respectively.

Procured products and services are divided into several categories, such as Investment and Logistics, IT, Human Resources, Marketing and Communication, Information Security, Retail, and Legal Services.

The Procurement, Investment, and Logistics Directorate is responsible for all procurement in BT, except the procurement of goods, IT services, and software, related licenses and maintenance, carried out by the Information Security Department, the procurement of equipment, products, and services used in the card issuing and approval process, legal assistance, human resources services as well as the procurement of marketing and advertising services, which are the responsibility of the Directors of each department.

As a rule, purchases are generally made by selecting the supplier from at least three bids from the same number of different and independent bidders. The selection process for goods and services suppliers is carried out using **Oracle Fusion Cloud Procurement**, implemented in 2020. For new goods or services procurement contracts whose estimated value exceeds €100,000, the approval of the Compliance Department - Compliance Risk Management Service is required for potential conflicts of interest and reputational risk.

In 2023, there were no significant changes in the location of the supply chain.

The BT Group's suppliers comply with the principles of business continuity, providing services and goods for both critical and non-critical activities at all times. As for the other entities, suppliers participating in the tender selections organized by the Bank have agreed to extend the contractual terms and prices offered to other BT Group entities.

2023

Since 2022, steps have been taken to promote sustainability principles in our relationships with suppliers. This initiative involves acting on two fronts: integrating ESG criteria into the selection process for new suppliers, and collecting additional information from existing suppliers that highlights their commitment to the sustainability pillars. This initiative is based on an online questionnaire. As a result, 139 key suppliers of services and products were assessed against ESG criteria in 2023. Cumulatively, this represents more than 50% of the Group's supplier spending in 2023.

When selecting or evaluating new suppliers, **ISO 14001** certification is an important part of the criteria used to assess the quality of suppliers of goods and services. In addition, information such as the energy efficiency of the products offered, the availability of a recycling policy for the materials used, respect for the working and health conditions of employees, involvement in socially responsible activities and/or activities to protect the environment are also assessed and used in the evaluation process.

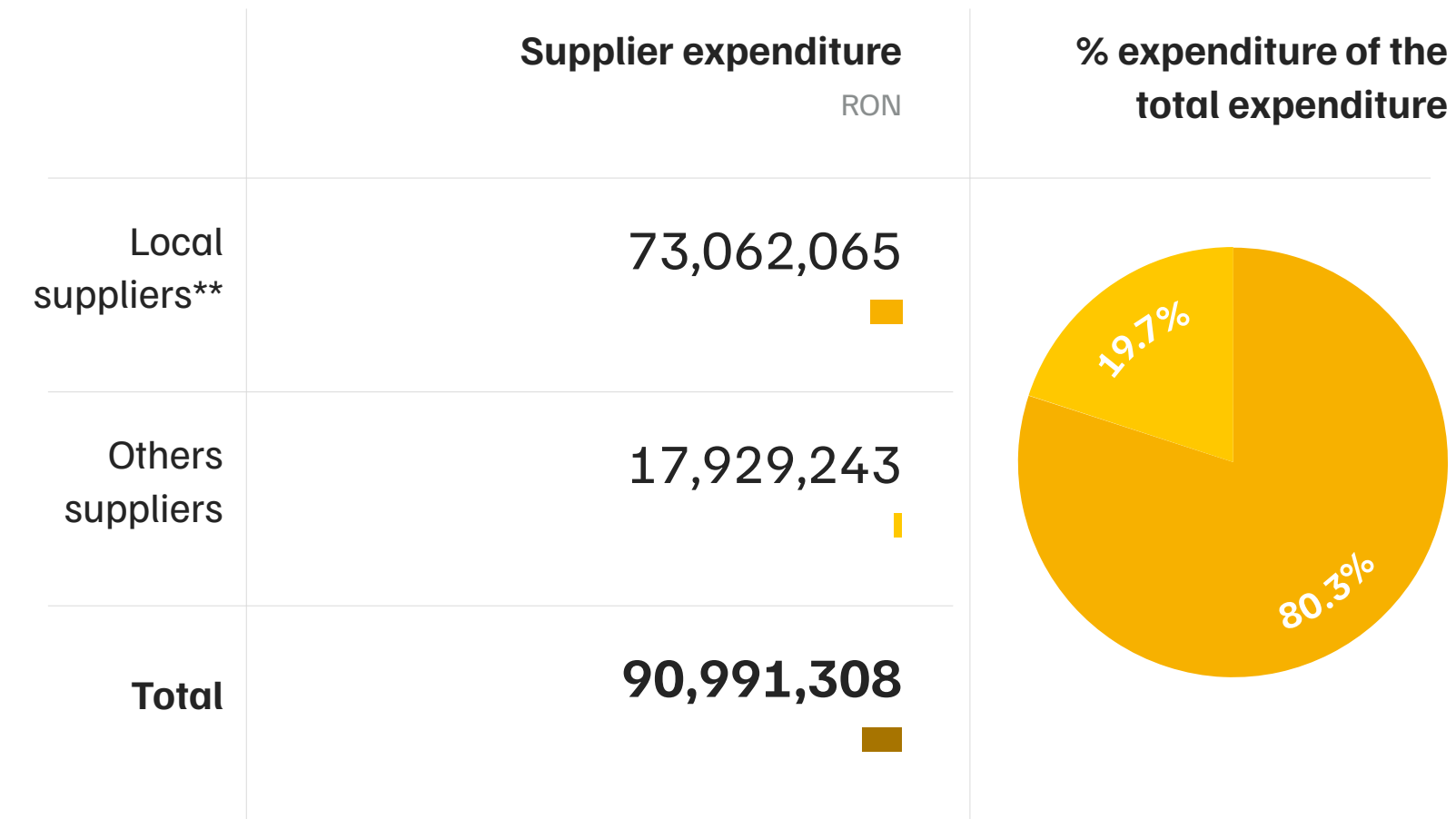
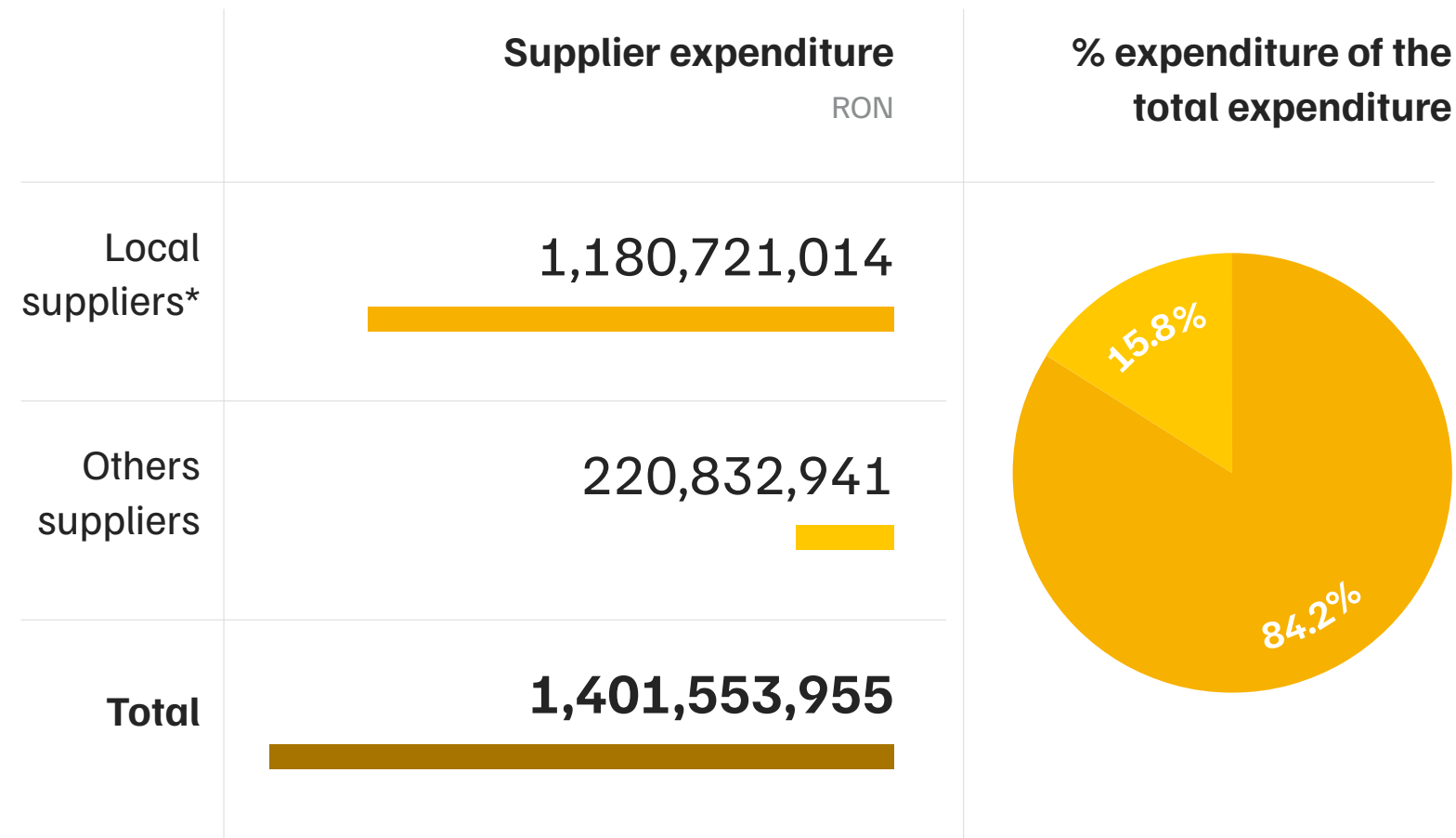
The information collected from potential suppliers is accompanied by supporting documents related to each aspect presented.

BTFG Romania

2023

BTFG Moldova

2023

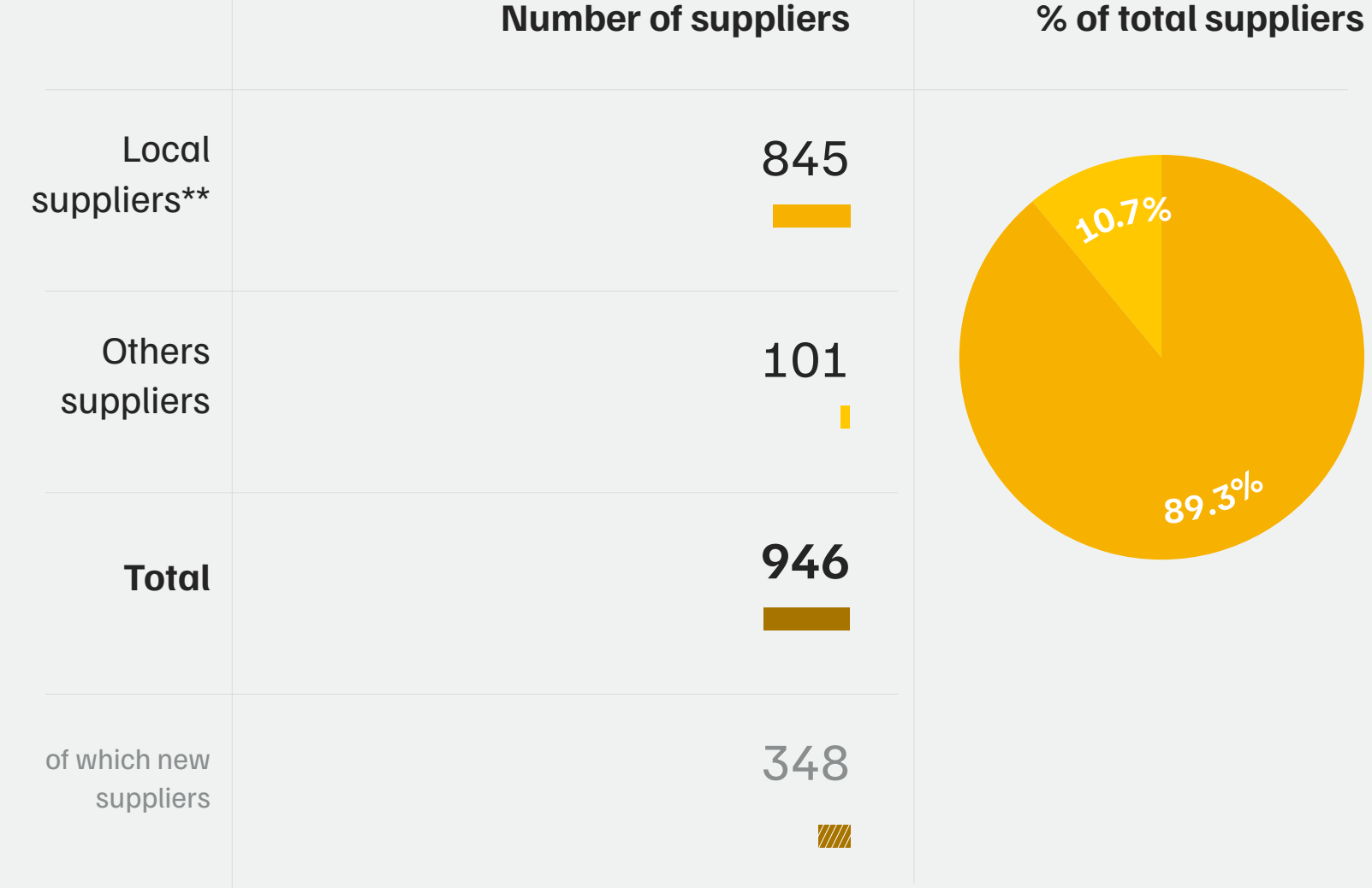
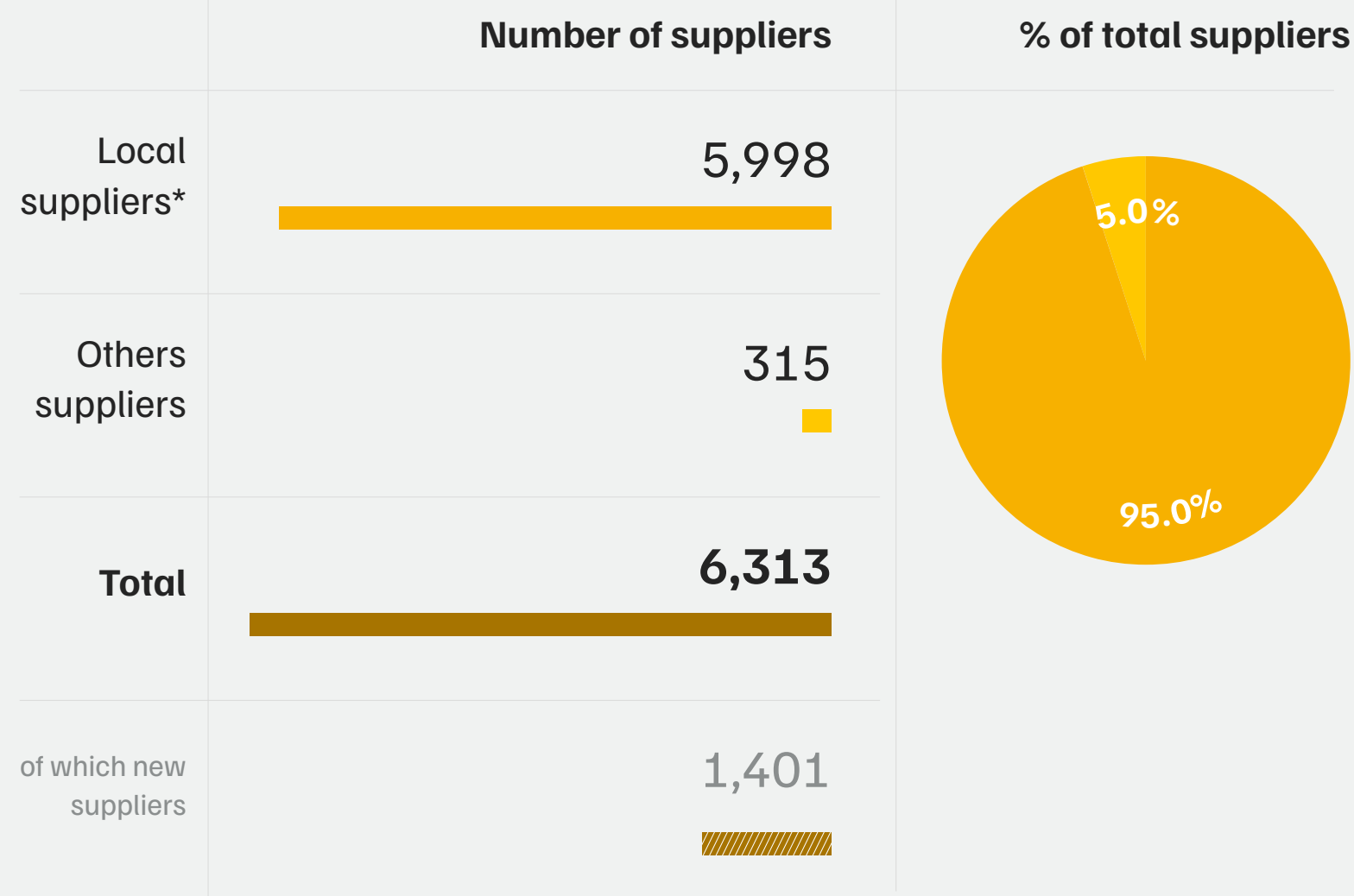


In 2023,
84.0%
of BTFG supplier
spending was
directed to the
~94.3%
of local suppliers.

In 2022,
78%
of BTFG supplier
spending was
directed to the
~90%
of local suppliers.

The suppliers' expenditures in 2023 for BTFG include operating expenses (OpEx) and capital expenditures (CapEx) which represent additions to property and equipment, investment property, and intangible assets. It is worth highlighting that certain expenses, such as those associated with right of use assets and core business operations of the Group, were not considered in the calculation of this indicator.

The number of suppliers from each category (local, other, total) represent the legal entities from whom BTFG purchased products and services during 2023. The number does not include private individuals suppliers (for example: private individuals renting offices or spaces).



*local supplier = supplier registered in Romania

** local supplier = supplier registered in the Republic of Moldova



5

**Conclusions and
future actions**

Performance

objective

3.5 billion lei in green loans production granted to companies (validated according to the CAFI methodology)

deadline

2023-2025

objective

Minimum 15%: proportion of green mortgages out of total mortgages in balance (value)

deadline

Annually starting 2024

objective

Minimum 2 national events organized for our clients, to promote awareness and education on green financing products, energy efficiency, and climate risk management

deadline

Annually

objective

Minimum 30%: proportion of electric and hybrid vehicles in the leasing portfolio

deadline

Annually starting 2024

objective

Minimum 85%: rate of digitalized customers out of total customers

deadline

Annually

objective

Minimum 20%: green mortgage production out of total annual production

deadline

Annually

objective

Minimum 95%: completion rate of data protection training

deadline

Annually

People

objective

Minimum 50%: eNPS employee participation rate

deadline

Annually

objective

Minimum 40 hours: average number of training hours per BTFG employee

deadline

Annually

objective

Minimum 2 hours: average number of training hours on ESG aspects per BTFG employee

deadline

Annually

objective

Year-on-year reduction of the salary gap between women and men in the company

deadline

Annually

Environment

objective

Minimum 85%: proportion of renewable energy in the total energy consumption of BTFG companies

deadline

Annually

objective

Year-on-year reduction of emissions from own activities (Scope 1, Scope 2, and relevant categories of Scope 3 other than financed emissions)

deadline

By 2026

objective

Calculation of financed emissions for the 3rd consecutive year

deadline

2024

Annexes

Annex 1:
KPIs disclosed under Article 8
Taxonomy Regulation

Annex 2:
Exclusion list

Annex 3:
Green Financing Framework

Annex 1:

KPIs disclosed under Article 8 Taxonomy Regulation

1. Assets for the calculation of GAR (Turnover)
2. GAR sector information (Turnover)
3. GAR KPI stock (Turnover)
4. GAR KPI flow (Turnover)
5. KPI off-balance sheet exposures stock (Turnover)
6. KPI off-balance sheet exposures flow (Turnover)

1. Assets for the calculation of GAR (CapEx)
2. GAR sector information (CapEx)
3. GAR KPI stock (CapEx)
4. GAR KPI flow (CapEx)
5. KPI off-balance sheet exposures stock (CapEx)
6. KPI off-balance sheet exposures flow (CapEx)

Annex 12 - Template 1
Nuclear and fossil gas related activities

Annex 12 - Template 2
Taxonomy-aligned economic activities (denominator)

Annex 12 - Template 3
Taxonomy-aligned economic activities (numerator)

Annex 12 - Template 4
Taxonomy-eligible but not taxonomy-aligned economic activities

Annex 12 - Template 5
Taxonomy non-eligible economic activities

1. Assets for the calculation of GAR (Turnover)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2023																										
		Total [gross] carrying amount	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)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator																												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	10,816.37	643.08	258.82	255.23	-	9.99	166.93	-	-	-	-	-	-	431.61	-	-	-	-	-	-	-	-	-	-	-	-	9.99
2	Financial undertakings	2,018.63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	Credit institutions	1,601.49	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	Loans and advances	973.58	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	627.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	417.14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	286.08	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	0.85	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	259.61	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	25.62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	12.69	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	12.69	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

1. Assets for the calculation of GAR (Turnover)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2023																															
		Total [gross] carrying amount	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)												
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)												
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 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							
20	Non-financial undertakings	1,206.77	386.40	9.99	6.39	-	9.99	3.94	-	-	-	-	-	431.61	-	-	-	-	-	-	-	-	-	-	7.82	-	-	-	829.77	9.99	6.39	-	9.99
21	Loans and advances	1,194.20	386.40	9.99	6.39	-	9.99	3.94	-	-	-	-	-	431.61	-	-	-	-	-	-	-	-	-	-	-	-	-	829.77	9.99	6.39	-	9.99	
22	Debt securities, including UoP	12.57	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	4,225.98	248.83	248.83	248.83	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	248.83	248.83	248.83	-	-		
25	of which loans collateralised by residential immovable property	4,212.65	248.83	248.83	248.83	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	248.83	248.83	248.83	-	-		
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	13.33	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	3,365.00	7.84	-	-	-	-	162.99	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	170.84	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	3,365.00	7.84	-	-	-	-	162.99	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	170.84	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	6.44	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	7,955.05	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33	Financial and Non-financial undertakings	6,085.59																															
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	5,908.41																															
35	Loans and advances	5,893.74																															
36	of which loans collateralised by commercial immovable property	2,604.01																															
37	of which building renovation loans	-																															
38	Debt securities	13.88																															
39	Equity instruments	0.79																															

1. Assets for the calculation of GAR (Turnover)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Total [gross] carrying amount	Year ending 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)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 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		
40	Non-EU country counterparties not subject to NFRD disclosure obligations	177.17																										
41	Loans and advances	177.17																										
42	Debt securities	-																										
43	Equity instruments	-																										
44	Derivatives	25.09																										
45	On demand interbank loans	351.55																										
46	Cash and cash-related assets	838.84																										
47	Other categories of assets (e.g. Goodwill, commodities etc.)	653.98																										
48	Total GAR assets	18,777.86	643.08	258.82	255.23	-	9.99	166.93	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.99	
49	Assets not covered for GAR calculation	13,496.99																										
50	Central governments and Supranational issuers	9,034.80																										
51	Central banks exposure	4,017.38																										
52	Trading book	444.81																										
53	Total assets	32,274.84	643.08	258.82	255.23	-	9.99	166.93	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.99	
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																												
54	Financial guarantees	181.83	94.39	1.03	-	-	1.03	5.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.03	
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

1. Assets for the calculation of GAR (Turnover)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2022																															
		Total [gross] carrying amount	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)										
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)										
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling						
GAR - Covered assets in both numerator and denominator																																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8,531.21	415.80	107.56	107.56	-	-	-	79.75	-	-	-	-	-	-	443.20	-	-	-	-	-	-	-	-	1.99	-	-	-	940.73	107.56	107.56	-	-
2	Financial undertakings	1,627.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
3	Credit institutions	1,289.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4	Loans and advances	768.36	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	Debt securities, including UoP	520.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	338.81	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
8	of which investment firms	50.92	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
9	Loans and advances	6.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	19.19	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	Equity instruments	25.53	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	9.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	9.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

1. Assets for the calculation of GAR (Turnover)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2022																											
		Total [gross] carrying amount	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)							
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 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			
20	Non-financial undertakings	1,007.27	307.35	-	-	-	-	4.23	-	-	-	-	-	443.20	-	-	-	-	-	-	-	-	-	-	756.77	-	-	-	-
21	Loans and advances	996.40	307.35	-	-	-	-	4.23	-	-	-	-	-	443.20	-	-	-	-	-	-	-	-	-	-	756.77	-	-	-	-
22	Debt securities, including UoP	10.86	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	3,962.44	107.56	107.56	107.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	107.56	107.56	107.56	-	-	
25	of which loans collateralised by residential immovable property	3,952.96	107.56	107.56	107.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	107.56	107.56	107.56	-	-	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	9.48	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	1,933.59	0.89	-	-	-	-	75.52	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	76.41	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	1,933.59	0.89	-	-	-	-	75.52	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	76.41	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	5.85	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings																												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																												
35	Loans and advances																												
36	of which loans collateralised by commercial immovable property																												
37	of which building renovation loans																												
38	Debt securities																												
39	Equity instruments																												

1. Assets for the calculation of GAR (Turnover)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2022																																	
		Total [gross] carrying amount	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)												
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)												
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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								
40	Non-EU country counterparties not subject to NFRD disclosure obligations																																		
41	Loans and advances																																		
42	Debt securities																																		
43	Equity instruments																																		
44	Derivatives																																		
45	On demand interbank loans																																		
46	Cash and cash-related assets																																		
47	Other categories of assets (e.g. Goodwill, commodities etc.)																																		
48	Total GAR assets	8,537.05	415.80	107.56	107.56	-	-	79.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.99	-	-	-	940.73	107.56	107.56	-	-		
49	Assets not covered for GAR calculation																																		
50	Central governments and Supranational issuers																																		
51	Central banks exposure																																		
52	Trading book																																		
53	Total assets	8,537.05	415.80	107.56	107.56	-	-	79.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.99	-	-	-	940.73	107.56	107.56	-	-		
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																			
54	Financial guarantees	194.01	125.49	1.11	-	-	1.11	6.84	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	169.25	1.11	-	-	1.11		
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

2. GAR sector information (Turnover)



Note: Eligibility is split based on alignment split

Breakdown by sector - NACE 4 digits level (code and label)		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 EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	D 35.23 Trade of gas through mains	51.10	7.29			-	-			-	-			-	-			-	-			-	-			51.10	7.29		
2	D 35.13 Distribution of electricity	50.62	2.51			-	-			-	-			-	-			-	-			-	-			50.62	2.51		
3	D 35.22 Distribution of gaseous fuels through mains	20.40	0.16			-	-			-	-			-	-			-	-			-	-			20.40	0.16		
4	C 19.20 Manufacture of refined petroleum products	-	0.03			-	-			-	-			-	-			-	-			-	-			-	0.03		
5	H 49.50 Transport via pipeline	4.98	-			-	-			-	-			-	-			-	-			-	-			4.98	-		
6	C 27.51 Manufacture of electric domestic appliances	40.67	-			-	-			-	-			-	-			-	-			-	-			40.67	-		
7	D 35.14 Trade of electricity	37.64	-			-	-			-	-			-	-			-	-			-	-			37.64	-		
8	H 53.20 Other postal and courier activities	29.23	-			-	-			-	-			-	-			-	-			-	-			29.23	-		
9	F 41.20 Construction of residential and non-residential buildings	25.93	-			-	-			-	-			-	-			-	-			-	-			25.93	-		
10	C 24.42 Aluminium production	15.09	-			-	-			-	-			-	-			-	-			-	-			15.09	-		
11	C 23.61 Manufacture of concrete products for construction purposes	17.58	-			-	-			-	-			-	-			-	-			-	-			17.58	-		
12	H 51.10 Passenger air transport	13.15	-			-	-			-	-			-	-			-	-			-	-			13.15	-		
13	C 29.32 Manufacture of other parts and accessories for motor vehicles	11.52	-			-	-			-	-			-	-			-	-			-	-			11.52	-		
14	H 49.20 Freight rail transport	7.17	-			-	-			-	-			-	-			-	-			-	-			7.17	-		
15	C 23.63 Manufacture of ready-mixed concrete	6.49	-			-	-			-	-			-	-			-	-			-	-			6.49	-		
16	C 20.15 Manufacture of fertilisers and nitrogen compounds	6.35	-			-	-			-	-			-	-			-	-			-	-			6.35	-		
17	C 22.23 Manufacture of builders' ware of plastic	6.17	-			-	-			-	-			-	-			-	-			-	-			6.17	-		
18	C 25.11 Manufacture of metal structures and parts of structures	6.08	-			-	-			-	-			-	-			-	-			-	-			6.08	-		
19	F 43.21 Electrical installation	6.07	-			-	-			-	-			-	-			-	-			-	-			6.07	-		
20	J 61.20 Wireless telecommunications activities	5.59	-			-	-			-	-			-	-			-	-			-	-			5.59	-		
21	E 38.11 Collection of non-hazardous waste	5.32	-			-	-			-	-			-	-			-	-			-	-			5.32	-		
22	C 30.30 Manufacture of air and spacecraft and related machinery	4.99	-			-	-			-	-			-	-			-	-			-	-			4.99	-		
23	C 27.32 Manufacture of other electronic and electric wires and cables	3.67	-			-	-			-	-			-	-			-	-			-	-			3.67	-		
24	H 52.24 Cargo handling	2.42	-			-	-			-	-			-	-			-	-			-	-			2.42	-		
25	C 16.21 Manufacture of veneer sheets and wood-based panels	1.94	-			-	-			-	-			-	-			-	-			-	-			1.94	-		
26	C 24.53 Casting of light metals	0.99	-			-	-			-	-			-	-			-	-			-	-			0.99	-		
27	F 42.22 Construction of utility projects for electricity and telecommunications	0.95	-			-	-			-	-			-	-			-	-			-	-			0.95	-		
28	C 28.15 Manufacture of bearings, gears, gearing and driving elements	0.74	-			-	-			-	-			-	-			-	-			-	-			0.74	-		
29	M 71.12 Engineering activities and related technical consultancy	0.62	-			-	-			-	-			-	-			-	-			-	-			0.62	-		
30	C 27.12 Manufacture of electricity distribution and control apparatus	0.54	-			-	-			-	-			-	-			-	-			-	-			0.54	-		

2. GAR sector information (Turnover)



Note: Eligibility is split based on alignment split

Breakdown by sector - NACE 4 digits level (code and label)		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 EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
31	C 22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	0.46	-			-	-			-	-			-	-			-	-			-	-			0.46	-		
32	C 30.20 Manufacture of railway locomotives and rolling stock	0.41	-			-	-			-	-			-	-			-	-			-	-			0.41	-		
33	M 71.20 Technical testing and analysis	0.32	-			-	-			-	-			-	-			-	-			-	-			0.32	-		
34	C 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0.28	-			-	-			-	-			-	-			-	-			-	-			0.28	-		
35	C 25.72 Manufacture of locks and hinges	0.26	-			-	-			-	-			-	-			-	-			-	-			0.26	-		
36	C 24.20 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
37	C 29.10 Manufacture of motor vehicles	0.08	-			-	-			-	-			-	-			-	-			-	-			0.08	-		
38	J 62.01 Computer programming activities	0.08	-			-	-			-	-			-	-			-	-			-	-			0.08	-		
39	C 28.13 Manufacture of other pumps and compressors	0.06	-			-	-			-	-			-	-			-	-			-	-			0.06	-		
40	J 63.11 Data processing, hosting and related activities	0.05	-			-	-			-	-			-	-			-	-			-	-			0.05	-		
41	C 29.31 Manufacture of electrical and electronic equipment for motor vehicles	0.05	-			-	-			-	-			-	-			-	-			-	-			0.05	-		
42	C 23.51 Manufacture of cement	0.05	-			-	-			-	-			-	-			-	-			-	-			0.05	-		
43	L 68.32 Management of real estate on a fee or contract basis	0.04	-			-	-			-	-			-	-			-	-			-	-			0.04	-		
44	H 49.31 Urban and suburban passenger land transport	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
45	C 27.20 Manufacture of batteries and accumulators	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
46	C 30.11 Building of ships and floating structures	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
47	C 17.12 Manufacture of paper and paperboard	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
48	H 49.41 Freight transport by road	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
49	C 10.12 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-			17.20	-			-	-			-	-			17.20	-		
50	C 10.13 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-			3.91	-			-	-			-	-			3.91	-		
51	C 10.32 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-			5.27	-			-	-			-	-			5.27	-		
52	C 10.61 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-			5.40	-			-	-			-	-			5.40	-		
53	C 11.05 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-			0.32	-			-	-			-	-			0.32	-		
54	C 11.07 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-			32.70	-			-	-			-	-			32.70	-		
55	C 14.13 Repair, refurbishment and remanufacturing	-	-			-	-			-	-			0.16	-			-	-			-	-			0.16	-		
56	C 15.20 Repair, refurbishment and remanufacturing	-	-			-	-			-	-			0.02	-			-	-			-	-			0.02	-		
57	C 31.02 Repair, refurbishment and remanufacturing	-	-			-	-			-	-			2.17	-			-	-			-	-			2.17	-		
58	C 31.09 Repair, refurbishment and remanufacturing	-	-			-	-			-	-			6.90	-			-	-			-	-			6.90	-		
59	E 36.00 Water collection, treatment and supply	-	-			1.16	-			-	-			-	-			-	-			-	-			1.16	-		
60	F 42.91 Construction of water projects	-	-			2.32	-			-	-			-	-			-	-			-	-			2.32	-		

2. GAR sector information (Turnover)



Note: Eligibility is split based on alignment split

Breakdown by sector - NACE 4 digits level (code and label)		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 EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
61	G 46.35 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.53	-	-	-	-	-	-	-	-	-	-	-	0.53	-	-	-		
62	G 46.39 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	2.80	-	-	-	-	-	-	-	-	-	-	-	2.80	-	-	-		
63	G 46.71 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.29	-	-	-	-	-	-	-	-	-	-	-	0.29	-	-	-		
64	G 47.11 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	271.29	-	-	-	-	-	-	-	-	-	-	-	271.29	-	-	-		
65	G 47.19 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.22	-	-	-	-	-	-	-	-	-	-	-	0.22	-	-	-		
66	G 47.42 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.07	-	-	-	-	-	-	-	-	-	-	-	0.07	-	-	-		
67	G 47.52 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	56.84	-	-	-	-	-	-	-	-	-	-	-	56.84	-	-	-		
68	G 47.54 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	16.53	-	-	-	-	-	-	-	-	-	-	-	16.53	-	-	-		
69	G 47.73 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	8.49	-	-	-	-	-	-	-	-	-	-	-	8.49	-	-	-		
70	G 47.75 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.13	-	-	-	-	-	-	-	-	-	-	-	0.13	-	-	-		
71	G 47.78 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.38	-	-	-	-	-	-	-	-	-	-	-	0.38	-	-	-		
72	I 55.10 Hotels and similar accommodation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7.82	-	-	7.82	-	-	-		
73	N 81.30 Landscape service activities	-	-	-	-	0.07	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07	-	-	-		
74	O 84.25 Fire service activities	-	-	-	-	0.04	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04	-	-	-		
75	B 09.10 Support activities for petroleum and natural gas extraction	-	-	-	-	0.35	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.35	-	-	-		

3. GAR KPI stock (Turnover)



		Year ending 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								
GAR - Covered assets in both numerator and denominator																																
1	Loans and advances, debt securities and equity instruments not HfT 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	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	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	-	-		-	-	-		-	-		-	-	-		-	-		-	-		-	-		-	-		-	-	-	-	

3. GAR KPI stock (Turnover)



		Year ending 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							
20	Non-financial undertakings	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	Households	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	Local governments financing	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	Total GAR assets	3.42%	1.38%	1.36%	-	0.05%	0.89%	-	-	-	-	-	-	2.30%	-	-	-	-	-	-	-	-	-	-	-	0.04%	-	-	-	6.65%	1.38%	1.36%	-	0.05%	57.64%

3. GAR KPI stock (Turnover)



		Year ending at 31.12.2022																								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									
GAR - Covered assets in both numerator and denominator																																					
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	4.87%	1.26%	1.26%	-	-	0.93%	-	-	-	-	-	-	-	-	5.20%	-	-	-	-	-	-	-	-	-	-	0.02%	-	-	-	-	11.03%	1.26%	1.26%	-	-	99.93%
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19.07%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15.10%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.10%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.97%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.60%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.22%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.30%	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

3. GAR KPI stock (Turnover)



		Year ending at 31.12.2022																											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 enabling		Of which Use of Proceeds	Of which transitional	Of which enabling			
20	Non-financial undertakings	30.51%	-	-	-	0.42%	-	-	-	-	-	-	44.00%	-	-	-	-	-	-	-	-	0.20%	-	-	-	75.13%	-	-	-	11.80%
21	Loans and advances	30.85%	-	-	-	0.42%	-	-	-	-	-	-	44.48%	-	-	-	-	-	-	-	-	0.20%	-	-	-	75.95%	-	-	-	11.67%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	2.71%	2.71%	2.71%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.71%	2.71%	2.71%	-	46.41%	
25	of which loans collateralised by residential immovable property	2.72%	2.72%	2.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.72%	2.72%	2.72%	-	46.30%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.11%	
28	Local governments financing	0.05%	-	-	-	3.91%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.95%	-	-	-	22.65%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.05%	-	-	-	3.91%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.95%	-	-	-	22.65%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
32	Total GAR assets	4.87%	1.26%	1.26%	-	0.93%	-	-	-	-	-	-	5.19%	-	-	-	-	-	-	-	-	0.02%	-	-	-	11.02%	1.26%	1.26%	-	100%

4. GAR KPI flow (Turnover)



		Year ending 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								
GAR - Covered assets in both numerator and denominator																																
1	Loans and advances, debt securities and equity instruments not HfT 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	Financial undertakings	-	-	-	-	-	0.55%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.55%	-	-	-	-	6.64%
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%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	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%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24.72%	-	-	-	-	0.15%
17	Loans and advances	-	-	-	-	-	24.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24.72%	-	-	-	-	0.15%
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

4. GAR KPI flow (Turnover)



		Year ending 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		Of which Use of Proceeds	Of which transitional	Of which enabling							
20	Non-financial undertakings	24.70%	4.94%	-	-	4.94%	0.13%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	55.29%	4.94%	-	-	4.94%	8.45%
21	Loans and advances	24.70%	4.94%	-	-	4.94%	0.13%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	55.29%	4.94%	-	-	4.94%	8.45%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	17.72%	17.72%	17.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.72%	17.72%	17.72%	-	-	14.56%	
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	Local governments financing	0.13%	-	-	-	-	99.87%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	1.78%	
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	Total GAR assets	4.67%	3.00%	2.58%	-	0.42%	1.83%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.07%	3.00%	2.58%	-	0.42%	31.57%		

5. KPI off-balance sheet exposures stock (Turnover)



		Year ending 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)				
		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 eligible off-balance sheet 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 transitional	Of which enabling					
	Financial guarantees (FinGuar KPI)	51.91%	0.57%	-	-	0.57%	3.06%	-	-	-	-	-	-	-	-	18.92%	-	-	-	-	-	-	-	-	-	-	73.89%	0.57%	-	-	0.57%
1	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

6. KPI off-balance sheet exposures flow (Turnover)



		Year ending 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)						
		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 eligible off-balance sheet 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 transitional	Of which enabling					
	Financial guarantees (FinGuar KPI)	52.41%	0.60%	-	-	0.60%	-	-	-	-	-	-	-	-	38.97%	-	-	-	-	-	-	-	-	-	-	-	91.37%	0.60%	-	-	0.60%
1	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

1. Assets for the calculation of GAR (CapEx)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2023																													
		Total [gross] carrying amount	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)								
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)								
Of which Use of Proceeds					Of which Use of Proceeds			Of which Use of Proceeds			Of which Use of Proceeds			Of which Use of Proceeds			Of which Use of Proceeds			Of which Use of Proceeds											
Of which transitional					Of which transitional			Of which transitional			Of which transitional			Of which transitional			Of which transitional			Of which transitional											
Of which enabling					Of which enabling			Of which enabling			Of which enabling			Of which enabling			Of which enabling			Of which enabling											
GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	10,816.37	651.78	274.31	248.83	-	25.48	166.93	-	-	-	-	-	-	445.46	-	-	-	-	-	-	-	7.82	-	-	-	1,272.00	274.31	248.83	-	25.48
2	Financial undertakings	2,018.63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	Credit institutions	1,601.49	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	Loans and advances	973.58	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	627.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	417.14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	286.08	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	0.85	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	259.61	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	25.62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	12.69	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	12.69	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

1. Assets for the calculation of GAR (CapEx)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2023																													
		Total [gross] carrying amount	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)										
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)										
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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						
20	Non-financial undertakings	1,206.77	395.11	25.48	-	-	25.48	3.94	-	-	-	-	-	-	445.46	-	-	-	-	-	-	-	7.82	-	-	-	852.33	25.48	-	-	25.48
21	Loans and advances	1,194.20	395.11	25.48	-	-	25.48	3.94	-	-	-	-	-	-	445.46	-	-	-	-	-	-	-	7.82	-	-	-	852.33	25.48	-	-	25.48
22	Debt securities, including UoP	12.57	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	4,225.98	248.83	248.83	248.83	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	248.83	248.83	248.83	-	-	
25	of which loans collateralised by residential immovable property	4,212.65	248.83	248.83	248.83	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	248.83	248.83	248.83	-	-	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	13.33	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	3,365.00	7.84	-	-	-	-	162.99	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	170.84	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	3,365.00	7.84	-	-	-	-	162.99	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	170.84	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	6.44	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	7,955.05	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33	Financial and Non-financial undertakings	6,085.59																													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	5,908.41																													
35	Loans and advances	5,893.74																													
36	of which loans collateralised by commercial immovable property	2,604.01																													
37	of which building renovation loans	-																													
38	Debt securities	13.88																													
39	Equity instruments	0.79																													

1. Assets for the calculation of GAR (CapEx)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Total [gross] carrying amount	Year ending 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)								
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 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					
40	Non-EU country counterparties not subject to NFRD disclosure obligations	177.17																													
41	Loans and advances	177.17																													
42	Debt securities	-																													
43	Equity instruments	-																													
44	Derivatives	25.09																													
45	On demand interbank loans	351.55																													
46	Cash and cash-related assets	838.84																													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	653.98																													
48	Total GAR assets	18,777.86	651.78	274.31	248.83	-	25.48	166.93	-	-	-	-	-	445.46	-	-	-	-	-	-	-	7.82	-	-	-	-	1,272.00	274.31	248.83	-	25.48
49	Assets not covered for GAR calculation	13,496.99																													
50	Central governments and Supranational issuers	9,034.80																													
51	Central banks exposure	4,017.38																													
52	Trading book	444.81																													
53	Total assets	32,274.84	651.78	274.31	248.83	-	25.48	166.93	-	-	-	-	-	445.46	-	-	-	-	-	-	-	7.82	-	-	-	-	1,272.00	274.31	248.83	-	25.48
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	181.83	85.74	6.91	-	-	6.91	5.56	-	-	-	-	-	34.58	-	-	-	-	-	-	-	-	-	-	-	-	125.87	6.91	-	-	6.91
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	

1. Assets for the calculation of GAR (CapEx)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2022																															
		Total [gross] carrying amount	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)												
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)												
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling						
GAR - Covered assets in both numerator and denominator																																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8,531.21	398.97	107.56	107.56	-	-	79.75	-	-	-	-	-	-	454.99	-	-	-	-	-	-	-	-	-	1.99	-	-	-	935.70	107.56	107.56	-	-
2	Financial undertakings	1,627.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	Credit institutions	1,289.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	Loans and advances	768.36	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	520.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	338.81	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	50.92	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	6.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	19.19	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	25.53	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	9.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	9.91	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

1. Assets for the calculation of GAR (CapEx)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2022																												
		Total [gross] carrying amount	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)									
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)									
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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					
20	Non-financial undertakings	1,007.27	290.52	-	-	-	4.23	-	-	-	-	-	-	454.99	-	-	-	-	-	-	-	1.99	-	-	-	751.73	-	-	-	-
21	Loans and advances	996.40	290.52	-	-	-	4.23	-	-	-	-	-	-	454.99	-	-	-	-	-	-	-	1.99	-	-	-	751.73	-	-	-	-
22	Debt securities, including UoP	10.86	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	3,962.44	107.56	107.56	107.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	107.56	107.56	107.56	-	-	
25	of which loans collateralised by residential immovable property	3,952.96	107.56	107.56	107.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	107.56	107.56	107.56	-	-	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	9.48	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local governments financing	1,933.59	0.89	-	-	-	75.52	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	76.41	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	1,933.59	0.89	-	-	-	75.52	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	76.41	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	5.85	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33	Financial and Non-financial undertakings																													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations																													
35	Loans and advances																													
36	of which loans collateralised by commercial immovable property																													
37	of which building renovation loans																													
38	Debt securities																													
39	Equity instruments																													

1. Assets for the calculation of GAR (CapEx)



Exchange rate EUR 31.12.2023: 4,9746 Exchange rate EUR 31.12.2022: 4,9474

Million EUR		Year ending at 31.12.2022																																
		Total [gross] carrying amount	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)													
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)													
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (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 enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling						
40	Non-EU country counterparties not subject to NFRD disclosure obligations																																	
41	Loans and advances																																	
42	Debt securities																																	
43	Equity instruments																																	
44	Derivatives																																	
45	On demand interbank loans																																	
46	Cash and cash-related assets																																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)																																	
48	Total GAR assets	8,537.05	398.97	107.56	107.56	-	-	79.75	-	-	-	-	-	-	454.99	-	-	-	-	-	-	-	-	-	1.99	-	-	-	935.70	107.56	107.56	-	-	
49	Assets not covered for GAR calculation																																	
50	Central governments and Supranational issuers																																	
51	Central banks exposure																																	
52	Trading book																																	
53	Total assets	8,537.05	398.97	107.56	107.56	-	-	79.75	-	-	-	-	-	-	454.99	-	-	-	-	-	-	-	-	-	1.99	-	-	-	935.70	107.56	107.56	-	-	
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																		
54	Financial guarantees	194.01	119.92	1.19	-	-	1.19	6.84	-	-	-	-	-	-	37.09	-	-	-	-	-	-	-	-	-	-	-	-	163.85	1.19	-	-	1.19		
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

2. GAR sector information (CapEx)



Note: Eligibility is split based on alignment split

Breakdown by sector - NACE 4 digits level (code and label)		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 EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	D 35.23 Trade of gas through mains	43.63	18.78			-	-			-	-			-	-			-	-			-	-			43.63	18.78		
2	C 19.20 Manufacture of refined petroleum products	-	3.64			-	-			-	-			-	-			-	-			-	-			-	3.64		
3	D 35.13 Distribution of electricity	50.62	2.59			-	-			-	-			-	-			-	-			-	-			50.62	2.59		
4	D 35.22 Distribution of gaseous fuels through mains	45.71	0.48			-	-			-	-			-	-			-	-			-	-			45.71	0.48		
5	H 49.50 Transport via pipeline	3.73	-			-	-			-	-			-	-			-	-			-	-			3.73	-		
6	C 27.51 Manufacture of electric domestic appliances	40.67	-			-	-			-	-			-	-			-	-			-	-			40.67	-		
7	D 35.14 Trade of electricity	37.64	-			-	-			-	-			-	-			-	-			-	-			37.64	-		
8	H 53.20 Other postal and courier activities	29.23	-			-	-			-	-			-	-			-	-			-	-			29.23	-		
9	F 41.20 Construction of residential and non-residential buildings	25.93	-			-	-			-	-			-	-			-	-			-	-			25.93	-		
10	C 24.42 Aluminium production	7.19	-			-	-			-	-			-	-			-	-			-	-			7.19	-		
11	C 23.61 Manufacture of concrete products for construction purposes	17.58	-			-	-			-	-			-	-			-	-			-	-			17.58	-		
12	H 51.10 Passenger air transport	13.15	-			-	-			-	-			-	-			-	-			-	-			13.15	-		
13	C 29.32 Manufacture of other parts and accessories for motor vehicles	11.52	-			-	-			-	-			-	-			-	-			-	-			11.52	-		
14	H 49.20 Freight rail transport	7.17	-			-	-			-	-			-	-			-	-			-	-			7.17	-		
15	C 23.63 Manufacture of ready-mixed concrete	6.49	-			-	-			-	-			-	-			-	-			-	-			6.49	-		
16	C 20.15 Manufacture of fertilisers and nitrogen compounds	6.35	-			-	-			-	-			-	-			-	-			-	-			6.35	-		
17	C 22.23 Manufacture of builders' ware of plastic	6.17	-			-	-			-	-			-	-			-	-			-	-			6.17	-		
18	C 25.11 Manufacture of metal structures and parts of structures	6.08	-			-	-			-	-			-	-			-	-			-	-			6.08	-		
19	F 43.21 Electrical installation	6.07	-			-	-			-	-			-	-			-	-			-	-			6.07	-		
20	J 61.20 Wireless telecommunications activities	5.59	-			-	-			-	-			-	-			-	-			-	-			5.59	-		
21	E 38.11 Collection of non-hazardous waste	5.32	-			-	-			-	-			-	-			-	-			-	-			5.32	-		
22	C 30.30 Manufacture of air and spacecraft and related machinery	4.99	-			-	-			-	-			-	-			-	-			-	-			4.99	-		
23	C 27.32 Manufacture of other electronic and electric wires and cables	3.67	-			-	-			-	-			-	-			-	-			-	-			3.67	-		
24	H 52.24 Cargo handling	2.42	-			-	-			-	-			-	-			-	-			-	-			2.42	-		
25	C 16.21 Manufacture of veneer sheets and wood-based panels	1.94	-			-	-			-	-			-	-			-	-			-	-			1.94	-		
26	C 24.53 Casting of light metals	0.99	-			-	-			-	-			-	-			-	-			-	-			0.99	-		
27	F 42.22 Construction of utility projects for electricity and telecommunications	0.95	-			-	-			-	-			-	-			-	-			-	-			0.95	-		
28	C 28.15 Manufacture of bearings, gears, gearing and driving elements	0.74	-			-	-			-	-			-	-			-	-			-	-			0.74	-		
29	M 71.12 Engineering activities and related technical consultancy	0.62	-			-	-			-	-			-	-			-	-			-	-			0.62	-		
30	C 27.12 Manufacture of electricity distribution and control apparatus	0.54	-			-	-			-	-			-	-			-	-			-	-			0.54	-		

2. GAR sector information (CapEx)



Note: Eligibility is split based on alignment split

Breakdown by sector - NACE 4 digits level (code and label)		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 EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
31	C 22.11 Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	0.46	-			-	-			-	-			-	-			-	-			-	-			0.46	-		
32	C 30.20 Manufacture of railway locomotives and rolling stock	0.41	-			-	-			-	-			-	-			-	-			-	-			0.41	-		
33	M 71.20 Technical testing and analysis	0.32	-			-	-			-	-			-	-			-	-			-	-			0.32	-		
34	C 25.50 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0.28	-			-	-			-	-			-	-			-	-			-	-			0.28	-		
35	C 25.72 Manufacture of locks and hinges	0.26	-			-	-			-	-			-	-			-	-			-	-			0.26	-		
36	C 24.20 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
37	C 29.10 Manufacture of motor vehicles	0.08	-			-	-			-	-			-	-			-	-			-	-			0.08	-		
38	J 62.01 Computer programming activities	0.08	-			-	-			-	-			-	-			-	-			-	-			0.08	-		
39	C 28.13 Manufacture of other pumps and compressors	0.06	-			-	-			-	-			-	-			-	-			-	-			0.06	-		
40	J 63.11 Data processing, hosting and related activities	0.05	-			-	-			-	-			-	-			-	-			-	-			0.05	-		
41	C 29.31 Manufacture of electrical and electronic equipment for motor vehicles	0.05	-			-	-			-	-			-	-			-	-			-	-			0.05	-		
42	C 23.51 Manufacture of cement	0.05	-			-	-			-	-			-	-			-	-			-	-			0.05	-		
43	L 68.32 Management of real estate on a fee or contract basis	0.04	-			-	-			-	-			-	-			-	-			-	-			0.04	-		
44	H 49.31 Urban and suburban passenger land transport	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
45	C 27.20 Manufacture of batteries and accumulators	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
46	C 30.11 Building of ships and floating structures	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
47	C 17.12 Manufacture of paper and paperboard	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
48	H 49.41 Freight transport by road	0.01	-			-	-			-	-			-	-			-	-			-	-			0.01	-		
49	C 10.12 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-		17.20	-			-	-			-	-			17.20	-			
50	C 10.13 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-		3.91	-			-	-			-	-			3.91	-			
51	C 10.32 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-		5.27	-			-	-			-	-			5.27	-			
52	C 10.61 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-		5.40	-			-	-			-	-			5.40	-			
53	C 11.05 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-		0.32	-			-	-			-	-			0.32	-			
54	C 11.07 Marketplace for the trade of second-hand goods for reuse	-	-			-	-			-	-		32.70	-			-	-			-	-			32.70	-			
55	C 14.13 Repair, refurbishment and remanufacturing	-	-			-	-			-	-		0.16	-			-	-			-	-			0.16	-			
56	C 15.20 Repair, refurbishment and remanufacturing	-	-			-	-			-	-		0.02	-			-	-			-	-			0.02	-			
57	C 31.02 Repair, refurbishment and remanufacturing	-	-			-	-			-	-		2.17	-			-	-			-	-			2.17	-			
58	C 31.09 Repair, refurbishment and remanufacturing	-	-			-	-			-	-		6.90	-			-	-			-	-			6.90	-			
59	E 36.00 Water collection, treatment and supply	-	-			1.16	-			-	-		-	-			-	-			-	-			1.16	-			
60	F 42.91 Construction of water projects	-	-			2.32	-			-	-		-	-			-	-			-	-			2.32	-			

2. GAR sector information (CapEx)



Note: Eligibility is split based on alignment split

Breakdown by sector - NACE 4 digits level (code and label)		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 EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
61	G 46.35 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.53	-	-	-	-	-	-	-	-	-	-	0.53	-	-	-	-		
62	G 46.39 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	2.80	-	-	-	-	-	-	-	-	-	-	2.80	-	-	-	-		
63	G 46.71 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.29	-	-	-	-	-	-	-	-	-	-	0.29	-	-	-	-		
64	G 47.11 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	285.14	-	-	-	-	-	-	-	-	-	-	285.14	-	-	-	-		
65	G 47.19 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.22	-	-	-	-	-	-	-	-	-	-	0.22	-	-	-	-		
66	G 47.42 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.07	-	-	-	-	-	-	-	-	-	-	0.07	-	-	-	-		
67	G 47.52 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	56.84	-	-	-	-	-	-	-	-	-	-	56.84	-	-	-	-		
68	G 47.54 Sale of spare psarts	-	-	-	-	-	-	-	-	-	-	16.53	-	-	-	-	-	-	-	-	-	-	16.53	-	-	-	-		
69	G 47.73 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	8.49	-	-	-	-	-	-	-	-	-	-	8.49	-	-	-	-		
70	G 47.75 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.13	-	-	-	-	-	-	-	-	-	-	0.13	-	-	-	-		
71	G 47.78 Sale of spare parts	-	-	-	-	-	-	-	-	-	-	0.38	-	-	-	-	-	-	-	-	-	-	0.38	-	-	-	-		
72	I 55.10 Hotels and similar accommodation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7.82	-	7.82	-	-	-	-		
73	N 81.30 Landscape service activities	-	-	-	-	0.07	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07	-	-	-	-		
74	O 84.25 Fire service activities	-	-	-	-	0.04	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04	-	-	-	-		
75	B 09.10 Support activities for petroleum and natural gas extraction	-	-	-	-	0.35	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.35	-	-	-	-		

3. GAR KPI stock (CapEx)



		Year ending 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			
GAR - Covered assets in both numerator and denominator																											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6.03%	2.54%	2.30%	-	0.24%	1.54%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	33.51%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.25%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.96%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.02%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.95%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.29%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.89%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.80%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.08%	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

3. GAR KPI stock (CapEx)



		Year ending 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						
20	Non-financial undertakings	32.74%	2.11%	-	-	2.11%	0.33%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	70.63%	2.11%	-	-	2.11%	3.74%
21	Loans and advances	33.09%	2.13%	-	-	2.13%	0.33%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	71.37%	2.13%	-	-	2.13%	3.70%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	5.89%	5.89%	5.89%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.89%	5.89%	5.89%	-	-	-	13.09%
25	of which loans collateralised by residential immovable property	5.91%	5.91%	5.91%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.33%	1.33%	1.33%	-	-	-	13.05%
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%	
28	Local governments financing	0.23%	-	-	-	-	4.84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.08%	-	-	-	-	-	10.43%
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.23%	-	-	-	-	4.84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.08%	-	-	-	-	-	10.43%
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.02%	
32	Total GAR assets	3.47%	1.46%	1.33%	-	0.14%	0.89%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.77%	1.46%	1.33%	-	0.14%	-	33.53%	

3. GAR KPI stock (CapEx)



		Year ending at 31.12.2022																								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)								
% (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			
GAR - Covered assets in both numerator and denominator																											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	4.68%	1.26%	1.26%	-	-	0.93%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.93%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19.07%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15.10%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.10%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.97%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.60%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.22%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.30%	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

3. GAR KPI stock (CapEx)



		Year ending at 31.12.2022																											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 enabling		Of which Use of Proceeds	Of which transitional	Of which enabling			
20	Non-financial undertakings	28.84%	-	-	-	0.42%	-	-	-	-	-	-	45.17%	-	-	-	-	-	-	-	-	0.20%	-	-	-	74.63%	-	-	-	11.80%
21	Loans and advances	29.16%	-	-	-	0.42%	-	-	-	-	-	-	45.66%	-	-	-	-	-	-	-	-	0.20%	-	-	-	75.44%	-	-	-	11.67%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	2.71%	2.71%	2.71%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.71%	2.71%	2.71%	-	46.41%	
25	of which loans collateralised by residential immovable property	2.72%	2.72%	2.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.72%	2.72%	2.72%	-	46.30%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.11%	
28	Local governments financing	0.05%	-	-	-	3.91%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.95%	-	-	-	22.65%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.05%	-	-	-	3.91%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.95%	-	-	-	22.65%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
32	Total GAR assets	4.67%	1.26%	1.26%	-	0.93%	-	-	-	-	-	-	5.33%	-	-	-	-	-	-	-	-	0.02%	-	-	-	10.96%	1.26%	1.26%	-	100%

4. GAR KPI flow (CapEx)



		Year ending 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)												
% (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							
GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT 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	Financial undertakings	-	-	-	-	-	0.55%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.55%	-	-	-	-	3.71%
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%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	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%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24.72%	-	-	-	-	0.08%
17	Loans and advances	-	-	-	-	-	24.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24.72%	-	-	-	-	0.08%
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

4. GAR KPI flow (CapEx)



% (compared to flow of total eligible assets)		Year ending 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 enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling						
20	Non-financial undertakings	26.54%	5.81%	-	-	5.81%	0.13%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	58.34%	5.81%	-	-	5.81%	4.72%
21	Loans and advances	26.54%	5.81%	-	-	5.81%	0.13%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	58.34%	5.81%	-	-	5.81%	4.72%
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	17.72%	17.72%	17.72%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.72%	17.72%	17.72%	-	-	8.14%	
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	Local governments financing	0.13%	-	-	-	-	99.87%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	1.00%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.13%	-	-	-	-	99.87%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	1.00%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
32	Total GAR assets	4.83%	3.07%	2.58%	-	0.49%	1.83%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.33%	3.07%	2.58%	-	0.49%	38.27%	

5. KPI off-balance sheet exposures stock (CapEx)



		Year ending 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)				
		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 eligible off-balance sheet 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 transitional	Of which enabling					
	Financial guarantees (FinGuar KPI)	47.15%	3.80%	-	-	3.80%	3.06%	-	-	-	-	-	-	19.01%	-	-	-	-	-	-	-	-	-	-	-	69.22%	3.80%	-	-	3.80%	
1	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

6. KPI off-balance sheet exposures flow (CapEx)



		Year ending 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)						
		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 eligible off-balance sheet 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 transitional	Of which enabling					
	Financial guarantees (FinGuar KPI)	47.69%	3.42%	-	-	3.42%	-	-	-	-	-	-	-	38.97%	-	-	-	-	-	-	-	-	-	-	-	-	86.66%	3.42%	-	-	3.42%
1	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

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
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
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.	NO
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

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	-	-	-	-	-	-

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 (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 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	-	-	-	-	-	-

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 (CCM)		Climate change adaptation (CCA)	
		Amount EUR mil.	%	Amount EUR mil.	%	Amount EUR mil.	%
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	5.23	100%	5.23	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	5.23		5.23			

Taxonomy non-eligible economic activities

Row	Economic activities	Amount EUR mil.	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	-	-

Annex 2:

Exclusion list

Exclusion list

The following activities, directly or indirectly, shall be excluded from the Eligible Loans:

- The production of or trade in any product or activity deemed illegal under Romanian laws or regulations, or international conventions and agreement, or subject to international phase-out or bans, such as:
 - Production of or trade in products containing polychlorinated biphenyls (PCBs)
 - Production of or trade in pharmaceuticals, pesticides/herbicides, and other hazardous substances subject to international phase-outs or bans¹
 - Production of or trade in ozone-depleting substances subject to international phase-out²
 - Trade in wildlife or production of or trade in wildlife products regulated under CITES³
 - Transboundary movements of waste prohibited under international law⁴
- Production or use of or trade in unbounded asbestos fibres or asbestos-containing products⁵
- Activities prohibited by Romanian legislation or international conventions relating to the protection of biodiversity resources or cultural heritage⁶
- Drift net fishing in the marine environment using nets in excess of 2.5 km in length
- Shipment of oil or other hazardous substances in tankers which do not comply with International Maritime Organization (IMO) requirements⁷

- Trade in goods without required export or import licenses or other evidence of authorization of transit from the relevant countries of export, import, and, if applicable, transit
- Production or activities involving harmful or exploitative forms of forced labour⁸ / harmful child labour⁹
- Production or trade in weapons and munitions¹⁰
- Production or trade in radioactive material. This does not apply to the purchase of medical equipment, quality control equipment, and any equipment where radioactive source is trivial and/or adequately shielded
- Tobacco cultivation
- Production of or trade in tobacco
- Production of or trade in wood and/or primary forestry other than from sustainably managed forests
- Production of or trade in alcoholic beverages (excluding beer and wine)
- Gambling, casinos and equivalent
- Logging operations in tropical forests¹¹
- Pawnbroking activities and currency exchange offices
- Pornography, prostitution, videochat

Further, the following environmentally or socially sensitive business activities which refer to EBRD reference list will be excluded as well. The indicated (in italic) Performance Requirement will represent the principal criteria to meet for the activities not being excluded:

- Activities involving involuntary resettlement – *EBRD Performance Requirement 5*
- Activities within, adjacent to, or upstream of designated protected areas under national law or international conventions, sites of scientific interest, habitats of rare/endangered species, fisheries of economic importance, and primary/old growth forests of ecological significance – *EBRD Performance Requirement 6*
- Activities within, adjacent to, or upstream of land occupied by Indigenous Peoples and/or vulnerable groups including lands and watercourses used for subsistence activities such as livestock grazing, hunting, or fishing – *EBRD Performance Requirement 7*
- Activities which may affect adversely sites of cultural or archaeological significance – *EBRD Performance Requirement 8*
- Activities in the nuclear fuel production cycle
- Energy generation using nuclear fuels (excluding electricity import/export)
- Activities involving the release of Genetically Modified Organisms (GMO) into the natural environment – *EBRD Performance Requirement 6*
- Construction of mini-hydro cascades – *EBRD Eligibility Criteria for Small Hydro Projects*

¹ Reference documents are EU Regulation (EEC) No 2455/92 Concerning the Export and Import of Certain Dangerous Chemicals, as amended; UN Consolidated List of Products whose Consumption and/or Sale have been Banned, Withdrawn, Severely Restricted or not Approved by Governments; Convention the Prior Informed Consent Procedures for Certain Hazardous Chemicals and Pesticides in International Trade (Rotterdam Convention); Stockholm Convention on Persistent Organic Pollutants; WHO Classification of Pesticides by Hazard.

² Ozone Depleting Substances (ODSs): Chemical compounds which react with and deplete stratospheric ozone, resulting in widely publicised 'ozone holes'. The Montreal Protocol lists ODSs and their target reduction and phase out dates. A list of the chemical compounds regulated by the Montreal Protocol, which includes aerosols, refrigerants, foam blowing agents, solvents, and fire protection agents, together with details of signatory countries and phase out target dates, is available from the EBRD.

³ CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora. The lists of CITES protected species are available at www.cites.org/eng/app/index.shtml.

⁴ Reference documents are: Regulation (EC) No 1013/2006 of 14 June 2006 on shipments of waste; Decision C(2001)107/Final of the OECD Council concerning the revision of Decision C(92)39/ Final on the control of transboundary movements of wastes destined for recovery operations; Basel Convention of 22 March 1989 on the control of transboundary movements of hazardous wastes and their disposal.

⁵ This does not apply to the purchase and use of bonded asbestos cement sheeting where the asbestos content is <20%.

⁶ Relevant international conventions include, without limitation: Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention); Convention on Wetlands of International Importance, especially as Waterfowl Habitat (Ramsar Convention); Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention); World Heritage Convention; Convention on Biological Diversity.

⁷ This includes: tankers which do not have all required MARPOL SOLAS certificates (including, without limitation, ISM Code compliance), tankers blacklisted by the European Union or banned by the Paris Memorandum of Understanding on Port State Control (Paris MOU), and tankers due for phase out under MARPOL regulation 13G. No single hull tanker over 25 years old should be used.

⁸ Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

⁹ Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

¹⁰ This does not apply to funders of a project who are not substantially involved in these activities. 'Not substantially involved' means that the activity in question is secondary to the primary operations of a project funder.



¹¹ Sustainable managed forests - the bank's understanding of wood material from sustainable managed forests is wood that comes from legal harvesting and whose origin can be verified.



Annex 3:

Green Financing Framework

Green Financing Framework






Category	Description	SDG
1. Renewable Energy RE	<p>They are defined as installation or construction measures implemented by an entity targeting investments 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.</p> <p>For RE equipment the eligible project should directly produce or supply the component that is solely used for producing or supporting RE.</p> <p>Renewable energy sources:</p> <ul style="list-style-type: none"> → Wind → Solar - photovoltaic panel systems → Water - micro hydropower → Biogas (including from waste) → Biomass 	
2. Energy Efficiency EE	<p>They 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 service unit offered by the entity. This includes the use of waste-to-energy or any other measure for the efficient use of energy (or reduction of specific energy consumption) of the system directly impacted by the initiated project, based on minimum requirements.</p> <ol style="list-style-type: none"> a) a decrease of absolute energy consumption by at least 30% or b) a reduction of greenhouse gas emissions by at least 25,000 t CO₂e/year, or c) a reduction in electricity consumption of at least 50 GWh/year. d) Appliances and lighting with an energy efficiency comparison label representing at least 30% energy savings compared to the baseline. <p>For EE equipment or products, the eligible project should be the manufacture or direct supply of energy-efficient technology (equipment or appliances).</p> <p>EE equipment or products should be verified as energy efficient based on a benchmark that is representative of the market for the technology or product sold or be supplied directly to EE projects (as defined as an eligible EE project above).</p> <p>Eligible projects may include financing of energy efficiency measures in production or processing facilities. These include measures implemented by an entity to purchase, replace, redesign, or refurbish equipment, systems, and/or processes to improve energy consumption per production unit.</p>	

3. Transport T	<p>In the transport sector, the following products can be financed:</p> <ul style="list-style-type: none"> → Electric cars, or plug-in hybrids; → EE for vehicles that will be used to replace existing vehicles using the same fuel. New vehicles require a 30% improvement in fuel consumption, expressed in miles or kilometers per gallon or liter of fuel, compared to the vehicles to be replaced. <p>Part of the financing condition is the borrower's obligation that the vehicles being replaced will be phased out of service. The customer will submit an affidavit that within 12 months he will remove/dispose of the existing vehicles being replaced.</p> <p>Replacements involving the exchange of a gasoline-powered vehicle for one that runs on the following fuels are automatically qualified:</p> <ul style="list-style-type: none"> → Liquefied petroleum gas (LPG); → Gasoline blend with at least 15% ethanol (CNG); → Vehicles switching from diesel to biodiesel. 	
4. Green Buildings GB	<p>These are buildings that meet green building standards, such as:</p> <ul style="list-style-type: none"> → IFC Certificate of Excellence in Design for Greater Efficiencies (EDGE); → Leadership in Energy and Environmental Design (LEED) certificate issued by US Green Building; → "BREEAM" certificate, for the environmental assessment method as defined by Building Research; → Bronze, Silver, or Gold issued by the German Sustainable Building Council (DGNB); → RoGBC certificate or other types of certification; → nZEB certified buildings with 10% better pollution norm (net zero energy building - 10%). 	

Green Financing Framework



Category	Description	SDG
5. Water Efficiency EA	<p>These are investments that materially reduce water use per production unit. These projects can be carried out by upgrading an existing facility, a water recycling/reuse project, or a project that will use alternative water sources such as groundwater, desalinated water, or the implementation of advanced (tertiary) on-site wastewater treatment and are investments in fixed assets designed to reduce water consumption, provided that the decrease in water use from the initial baseline meets minimum requirements.</p> <ul style="list-style-type: none"> → Annual water savings (m3/year) from water efficiency projects; → Water use per production unit (water consumption/tonne, water consumption/night for hotel guests, water consumption/square meter in commercial buildings or shopping malls, water consumption/equivalent product, etc.); → Percentage/age of wastewater discharged; → Evidence of a water management strategy that will lead to a minimum 10% reduction in water consumption. 	 
6. Climate change adaptation CCA	<p>This category relates to funding that aims to reduce the vulnerability of human or natural systems to the effects of climate change and risks related to climate variability by maintaining or increasing adaptive capacity.</p> <p>A climate change adaptation project should reduce risk, exposure, or sensitivity to climate change, increase resilience, or build problem-solving capacity to respond to identified risks, vulnerabilities, or impacts. As an example:</p> <ul style="list-style-type: none"> → Investments in supplemental irrigation, multi-crop systems, drip irrigation, leveling, and other approaches and technologies that reduce the risk of large crop failures; → Investment in research and development of crops that are more resilient to extreme climate change; → Changes in the road or material levels due to rising sea and ocean levels. 	

7. Special Environmental Financing

SEF

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

- Financing in the above categories for which greenhouse gas (GHG) reductions cannot be calculated - e.g. working capital financing for manufacturers of energy-efficient equipment;
- Financing for 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 expansion and research services contributing to increased adoption of technologies enhancing smart agriculture.
- Financing companies that carry out certified organic farming;
- Reducing GHG emissions other than from energy sources: reducing fugitive emissions, and reducing emissions from industrial processes to mitigate the effects of climate change.
- Afforestation activities, forestry, enforcement of cross-compliance rules, biomass certificates, etc.
- Waste recycling companies.



8. Blue Financing

BF

Funding with a direct impact on aquatic ecosystems such as oceans, seas, watersheds, water resources, distribution networks, or water treatment and purification plants.

In summary, these grants mainly cover 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 production, packaging, and distribution of environmentally friendly products that avoid water/ocean/sea pollution;
- Water, ocean/sea friendly chemicals and plastics economic sectors: investments in research, design, development, and implementation of measures to manage, reduce, recycle, and treat plastic, pollution, or chemical waste in coastal and watershed areas;
- Sustainable shipping and logistics in port sectors: investment in research, design, development, and implementation of water management and waste reduction measures for shipping 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 standards approved by the IFC;
- Offshore renewable energy installations;
- Other (eligible activities in sustainable tourism sectors, etc).



GRI Content Index

GRI content index

Assurance	Banca Transilvania Financial Group's Sustainability Report has been audited as an independent limited assurance service in respect of certain specific indicators and certain material performance indicators, marked with <input checked="" type="checkbox"/> in the GRI Content Index. Deloitte Audit SRL provided the assurance service.
Statement of use	Banca Transilvania Financial Group has reported in accordance with the GRI Standards for the period January 1, 2023 - December 31, 2023
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	Currently not available

GRI Standard	Disclosure	Page number(s) and/or direct response	Omission			External assurance
			Requirement(s) omitted	Reason	Explanation	
General Disclosures						
GRI 2: General Disclosures 2021	2-1 Organizational details	4, 5, 7, 8				
	2-2 Entities included in the organization's sustainability reporting	4, 5				
	2-3 Reporting period, frequency, and contact point	4				
	2-4 Restatements of information	78, 110				
	2-5 External assurance	bit.ly/3wAZWjB				
	2-6 Activities, value chain and other business relationships	9-17, 142				
	2-7 Employees	103				<input checked="" type="checkbox"/>
	2-8 Workers who are not employees	105				
	2-9 Governance structure and composition	19-26, 39				
	2-10 Nomination and selection of the highest governance body	19, 25, 39				
	2-11 Chair of the highest governance body	19				
	2-12 Role of the highest governance body in overseeing the management of impacts	39-41				
	2-13 Delegation of responsibility for managing impacts	39-41				
	2-14 Role of the highest governance body in sustainability reporting	39-41				

2-15 Conflicts of interest	133				
2-16 Communication of critical concerns	133				
2-17 Collective knowledge of the highest governance body	No steps have been taken to improve the collective knowledge, skills and experience of the highest governance body on sustainable development.				
2-18 Evaluation of the performance of the highest governance body	39-41				
2-19 Remuneration policies	20, 25, 41, 106				
2-20 Process to determine remuneration	20, 25, 106				
2-21 Annual total compensation ratio	107				
2-22 Statement on sustainable development strategy	3, 44-46				
2-23 Policy commitments	29, 56, 132, 139, 141				
2-24 Embedding policy commitments	29, 56, 71, 105, 109, 119, 132, 139, 141				
2-25 Processes to remediate negative impacts	Incomplete information.			There are no formal commitments. All negative impacts are remediated in accordance with the national legal regulations in force in each country.	

22-26 Mechanisms for seeking advice and raising concerns	133				
2-27 Compliance with laws and regulations	134				
2-28 Membership associations	29, 31				
2-29 Approach to stakeholder engagement	47-51				<input checked="" type="checkbox"/>
2-30 Collective bargaining agreements	105				

Material topics

GRI 3: Material Topics 2021	3-1 Process to determine material topics	52, 53				
	3-2 List of material topics	52, 53				<input checked="" type="checkbox"/>

Economic value generated

GRI 3: Material Topics 2021	3-3 Management of material topics	54, 37				
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	37				
	201-4 Financial assistance received from government	37				
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	122-131				
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	107				
	202-2 Proportion of senior management hired from the local community	121				<input checked="" type="checkbox"/>

Business ethics and responsibility						
GRI 3: Material Topics 2021	3-3 Management of material topics	55, 132-134, 135, 137, 140				
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	136				
	205-2 Communication and training about anti-corruption policies and procedures	136				
	205-3 Confirmed incidents of corruption and actions taken	135				
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	132				
GRI 415: Public Policy 2016	415-1 Political contributions	133				
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labeling	134				
	417-3 Incidents of non-compliance concerning marketing communications	134				
Digitalization and cyber security						
GRI 3: Material Topics 2021	3-3 Management of material topics	55, 98-101, 137, 139				
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	138				
Non-GRI indicator (company-specific)	Total training hours related to data protection trainings	137				<input checked="" type="checkbox"/>
Non-GRI indicator (company-specific)	Number of unique digitized clients	98				
	Total number of training hours attended by employees on information security and phishing topics	139				

Environmental impact of the portfolio						
GRI 3: Material Topics 2021	3-3 Management of material topics	34, 35, 54, 56, 57, 60, 70				
Non-GRI indicator (company-specific)	Key areas of positive impact	29				
	Key areas of negative impact	29				
Non-GRI indicator (company-specific)	Green asset rate	36				
Sustainable financing						
GRI 3: Material Topics 2021	3-3 Management of material topics	55, 71-80, 102				
Non-GRI indicator (company-specific)	Green loans granted to Romanian companies	73				<input checked="" type="checkbox"/>
Non-GRI indicator (company-specific)	Positive social impact loans granted to Romanian companies	102				
Suppliers						
GRI 3: Material Topics 2021	3-3 Management of material topics	54, 141				
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	142				<input checked="" type="checkbox"/>

Access to financial services, inclusion, and financial education						
GRI 3: Material Topics 2021	3-3 Management of material topics	55, 91-97				
Non-GRI indicator (company-specific)	Proportion of the corporate loan portfolio for which BT Financial Group, through its subsidiary BT Mic, is the primary lender of the company	92				
	Number of loans outstanding on December 31, 2023, to women-owned business	92				
	Access points in economically underdeveloped or less populated areas	91, 93				
	Initiatives addressing financial education of the population and entrepreneurs	94-97				
Our employees						
GRI 3: Material Topics 2021	3-3 Management of material topics	55, 103-115, 119				
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	104				
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	113				
	401-3 Parental leave	114				
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	20, 21, 25, 26, 120				<input checked="" type="checkbox"/>
	405-2 Ratio of basic salary and remuneration of women to men	107				
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	121				

GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	110				<input checked="" type="checkbox"/>
	404-2 Programmes for upgrading employee skills and transition assistance programmes	109, 110				
	404-3 Percentage of employees receiving regular performance and career development reviews	111				
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	116				
	403-2 Hazard identification, risk assessment, and incident investigation	116				
	403-3 Occupational health services	116				
	403-4 Worker participation, consultation, and communication on occupational health and safety	116				
	403-5 Worker training on occupational health and safety	118				
	403-6 Promotion of worker health	113, 116				
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	116, 118				
	403-8 Workers covered by an occupational health and safety management system	116				
	403-9 Work-related injuries	117				

Community investments						
GRI 3: Material Topics 2021	3-3 Management of material topics	55, 122-131				
Non-GRI indicator (company-specific)	Total number of projects supported	123, 130				<input checked="" type="checkbox"/>
	Total value of sponsorships	122, 123, 130				<input checked="" type="checkbox"/>
Resource use and circular economy						
GRI 3: Material Topics 2021	3-3 Management of material topics	54, 69, 80-90				
GRI 301: Materials 2016	301-1 Materials used by weight or volume	89				
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	90				
	306-2 Management of significant waste-related impacts	90				
	306-3 Waste generated	90				
Water and marine resources						
GRI 3: Material Topics 2021	3-3 Management of material topics	54, 71, 72, 75				
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	71, 72, 75, 90				
	303-2 Management of water discharge related impacts	90				
	303-5 Water consumption	90				

Climate change							
GRI 3: Material Topics 2021	3-3 Management of material topics	54, 61, 69, 80-88					
GRI 302: Energy 2016	302-1 Energy consumption within the organization	88					
	302-3 Energy intensity	88					
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	85					
	305-2 Energy indirect (Scope 2) GHG emissions	85					
	305-3 Other indirect (Scope 3) GHG emissions	Other Scope 3 emissions	83-85				
		Financed emissions	83				<input checked="" type="checkbox"/>
	305-4 GHG emissions intensity	83, 84					



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