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**SUSTAINABILITY
STATEMENT**

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1. General Information

1.1 Basis of Preparation of the Sustainability Statement

DR BP-1 – General Basis for the Preparation of the Sustainability Statement

The Sustainability Statement of Banca Transilvania Financial Group (“BTFG”, “BT Group,” “the Group”, “we,” “our,” “the company”) has been prepared in accordance with Directive (EU) 2022/2464 on Corporate Sustainability Reporting (Corporate Sustainability Reporting Directive - CSRD), as transposed into Romanian legislation through National Bank of Romania (NBR) Order No. 1 of 16 May 2024, amending and supplementing Order No. 27/2010, as well as with the European Sustainability Reporting Standards (ESRS) issued by the European Financial Reporting Advisory Group (EFRAG).

Disclosures related to the EU Taxonomy have been prepared in accordance with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment, as well as with Commission Delegated Regulation (EU) 2021/2178, as subsequently amended by Commission Delegated Regulation (EU) 2026/73 of 4 July 2025.

The information presented in this Sustainability Statement covers the financial year 2025, for the period 1 January 2025 – 31 December 2025.

The Sustainability Statement has been prepared on a consolidated basis and includes the parent company and all subsidiaries within the consolidation perimeter used for the preparation of the Group’s consolidated financial statements, prepared in accordance with the International Financial Reporting Standards (IFRS).

In accordance with the provisions of Directive 2013/34/EU, as amended by Directive (EU) 2022/2464 (CSRD), entities included in the consolidation perimeter are exempt from the obligation to publish separate sustainability statements, provided that the relevant information is included in the consolidated sustainability statement of the parent undertaking. As of December 31, 2025, there are no other entities within BT Group subject to a separate obligation to publish an individual sustainability statement.

With regard to EU Taxonomy disclosures, these are determined at the level of the Group’s prudential consolidation perimeter, in accordance with the requirements applicable to credit institutions under Regulation (EU) No. 575/2013 (Capital Requirements Regulation – CRR) and the associated FINREP reporting framework.

A detailed description of the Group’s consolidation perimeter and of the entities included in the consolidated financial statements is provided in Note 1 to the Group’s consolidated financial statements for the financial year ended 31 December 2025.

The Sustainability Statement has been subject to an independent limited assurance engagement performed by Deloitte Audit SRL, in accordance with applicable assurance standards.

Omitted Information

No classified or sensitive information related to intellectual property, know-how, or innovation outcomes has been omitted from the Sustainability Statement. Furthermore, the option to omit disclosures regarding imminent developments or matters under negotiation has not been applied.

The quantitative financial data presented in this Sustainability Statement are expressed in the Group's functional currency, namely the Romanian leu (RON), unless otherwise specified. For non-financial indicators measured in specific units (e.g. greenhouse gas emissions), the unit of measurement is explicitly disclosed for each indicator, such as tonnes of carbon dioxide equivalent (tCO₂e).

All sustainability matters required under ESRS are reported at the level of BT Group. The sustainability strategy and overarching policy frameworks are, in principle, applicable across the entire Group and all subsidiaries, unless explicitly stated otherwise in the relevant sections of the Sustainability Statement

Information on the value chain

During June 2025 and December 2025, the double materiality analysis (DMA) was reviewed and updated to reflect developments in the Group's activities, portfolio structure, risk profile, and external environment, as well as to ensure enhanced alignment with ESRS requirements and current reporting practices in the financial sector. The update included a revalidation of previously identified impacts, risks, and opportunities, and a recalibration of scoring where necessary.

This updated analysis covered the entire value chain, structured as follows:

- Upstream value chain
 - IT systems and equipment suppliers
 - Payment service providers
 - Cleaning, security, and protection service providers
 - Depositors (clients providing funding)
 - Investors in bonds issued by the Bank
 - Business partners (law firms, consultants, auditors)
 - Non-governmental organisations (NGOs)
- Own operations
 - Buildings, IT equipment, direct consumption, vehicle fleet
 - Human resources

- Governance and compliance
- Legal
- IT
- Downstream value chain
 - Retail segment: Individuals
 - Non-retail segment:
 - micro-enterprises
 - SMEs
 - medium-sized companies
 - large corporations
 - treasury activities
 - other segments (Corporate Center)
 - Leasing
 - Asset management
 - Pension funds
 - Insurance

The Sustainability Statement covers all material sustainability matters identified across the entire value chain, with a particular focus on downstream activities, especially the lending portfolio, where the most significant impacts, risks, and opportunities have been identified. This approach reflects the specific business model of BT Group, which comprises multiple entities carrying out complementary financial activities, as well as the fact that the Group's most significant environmental and social impacts are primarily indirect, arising from financed activities. In this context, the value chain analysis places emphasis on the relationship with clients and the economic sectors financed, in line with the PCAF principles on financed emissions and portfolio impact assessment. This enables stakeholders to better understand both the scale of potential positive and negative impacts on the environment and society, as well as the measures implemented by the Group to manage these impacts and associated risks.

BP-2 – Disclosures in relation to specific circumstances

Time horizons

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

- "short term": 1 year; the short term refers to the financial reporting period
- "medium term": 1–5 years
- "long term": more than 5 years

Assumptions, estimates, and approximations

Certain indicators include information on the value chain, obtained either directly from clients and companies in which the Group invests or which it finances, or indirectly from external databases or industry-level estimates.

The most significant uncertainties are associated with the reporting of greenhouse gas (GHG) emissions, in particular for Scope 3, due to methodological limitations and reliance on data from external sources. In addition, reporting in accordance with the EU Taxonomy involves limitations regarding the accessibility of data reported by the Group's clients. Further details are available in the Environmental Information chapter, in the relevant subchapters (Taxonomy Information, Climate Change).

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

To improve the quality of reported data, the Group invests in more efficient data collection methods and update the methodologies applied in line with best practices.

Standards used for calculating or reporting of certain indicators

In addition to the ESRS requirements, the methodology used by the Group for estimating greenhouse gas emissions has been developed taking into account the principles and methodological guidelines set out in [the GHG Protocol Corporate Accounting and Reporting Standard](#), used for quantifying emissions generated by the Group's own operations. For the estimation of emissions associated with loan and investment portfolios, the Group considered the methodological guidance provided by the Partnership for Carbon Accounting Financials (PCAF), specifically the Global GHG Accounting and Reporting Standard for the Financial Industry – Part A: Financed Emissions (Second Edition, 2022).

The detailed description of the methodology used to calculate greenhouse gas emissions, both for own operations and for the financing portfolio, as well as the results of the estimates, are presented in Chapter 2.2 – Climate Change, of this Statement.

Furthermore, for the identification and analysis of impacts associated with the financing portfolio, the Company used the methodology and tools developed by the UNEP Finance Initiative, including the UNEP FI framework for mapping economic sectors to ESRS topics, sub-topics and sub-sub-topics. This approach enabled the systematic assessment of potential positive and negative impacts generated through financing activities, based on the characteristics of the financed economic sectors and the relevant exposures within the portfolio.

The use of UNEP FI tools supported the process of aggregating and prioritizing impacts at the portfolio level and contributed to the substantiation of the DMA.

1.2 Governance and Responsibilities

Shareholders

At Banca Transilvania, we maintain transparent and effective communication with our shareholders, and additional information is available in the investor relations section.

Banca Transilvania is the parent company of the BT Financial Group, holding majority stakes in its subsidiaries. Most entities within the Group use the BT brand and corporate identity, and the concept of “group” and the principles of customer service apply to subsidiaries operating outside Romania as well.

Through its governance structures, Banca Transilvania exercises its role as the majority shareholder/associate in relation to its subsidiaries, setting strategic directions at the Group level and defining their governance structures. In its relationship with these entities, Banca Transilvania ensures an appropriate governance and management framework, tailored to the specific nature of each subsidiary’s activities and risks, thereby contributing to the coherent and integrated operation of the BT Financial Group.

Shareholder Structure for Banca Transilvania S.A.

Shareholders	12/31/2025	12/31/2024
NN Group (*)	9.37%	9.37%
European Bank for Reconstruction and Development (EBRD)	5.16%	5.16%
Romanian individuals	25.15%	24.21%
Romanian companies	45.56%	45.20%
Foreign individuals	1.17%	1.11%
Foreign companies	13.59%	14.95%
Total	100.00%	100.00%

(*) NN Group N.V. and the pension funds managed by NN Pensii SAF PAP S.A. and NN Asigurări de Viață S.A.

Shareholder Structure for Victoriabank

Shareholders	12/31/2025	12/31/2024
VB Investment Holding (*)	72.19%	72.19%
Individuals, Republic of Moldova	27.41%	27.43%
Legal entities, Republic of Moldova	0.33%	0.31%
Foreign individuals	0.07%	0.07%
Total	100.00%	100.00%

(*) Banca Transilvania holds an indirect stake in VB of 44.63%; the EBRD holds an indirect stake in VB of 27.55%

Subsidiary	Field of activity	Percentage of ownership Direct and indirect December 31, 2025	Percentage of ownership Direct and indirect December 31, 2024
Victoriabank S.A.	Licensed financial, banking, and investment activities	44.63%	44.63%
BCR Chişinău S.A.	Licensed financial, banking, and investment activities	0%	44.63%
BT Capital Partners S.A.	Investments	99.62%	99.62%
BT Leasing Transilvania IFN S.A.	Leasing	100%	100%
BT Investments S.R.L.	Investments	100%	100%
BT Direct IFN S.A.	Consumer loans	100%	100%
BT Building S.R.L.	Investments	0%	100%
BT Asset Management SAI S.A.	Asset Management	100%	100%
BT Solution Asistent în Brokeraj S.R.L.	Insurance Broker	0%	100%
BT Asiom Insurance Agent S.R.L.	Insurance Broker	0%	100%
BT Safe Insurance Agent S.R.L.	Insurance broker	0%	100%
BT Intermedieri Insurance Agent S.R.L.	Insurance broker	0%	100%
BT Leasing MD S.R.L.	Leasing	100%	100%
BT Microfinancing IFN S.A.	Other lending activities	100%	100%
Improvement Credit Collection S.R.L.	Activities of collection agencies and credit reporting bureaus	100%	100%
VB Investment Holding B.V.	Holding activities	61.82%	61.82%
BT Pensii Societate de Administrare a Fondurilor de Pensii Facultative S.A.	Pension fund management (excluding those in the public system)	100%	100%

Subsidiary	Field of activity	Percentage of ownership Direct and indirect December 31, 2025	Percentage of ownership Direct and indirect December 31, 2024
Salt Bank S.A.	Licensed financial, banking, and investment activities	100%	100%
Avant Leasing IFN S.A.	Financial leasing	0%	100%
BT Insurance Broker S.R.L.	Insurance broker	100%	100%
Code Crafters by BT S.R.L.	Custom software development	100%	100%
BTP One S.R.L.	Leasing and subleasing of owned or leased real estate	99.73%	100%
BTP Retail S.R.L.	Leasing and subleasing of owned or leased real estate	99.73%	100
BTP Store Hub Turda S.R.L.	Leasing and subleasing of owned or leased real estate	99.73%	100%
BTP Store Hub Oradea S.R.L.	Leasing and subleasing of owned or leased real estate	99.73%	100%
OTP Bank Romania S.A.	Other monetary intermediation activities	0%	100%
Inter Terra S.R.L.	Purchase and sale of own real estate	99.73%	100%
INNO Investments S.A.I. S.A.	Asset management	100%	100%
OTP Advisors S.R.L.	Investments	0%	100%
OTP Factoring S.R.L.	Asset Management	100%	100%
REA Project One Company S.R.L.	Real Estate Development	0%	100%
GOVCKA Project Company S.R.L.	Real estate development	0%	100%
OTP Consulting Romania S.R.L.	Activities auxiliary to financial intermediation, excluding insurance and pension fund activities	0%	100%
O.C.N. Microinvest S.R.L	Other lending activities	44.63%	0
BRD Societate de Administrare a Fondurilor de Pensii Private S.A.	Pension fund activities (excluding those in the public insurance system)	100%	0
Secure Cash Express SRL	Investigation and private security services	100%	0%
Microinvest Technology LLC	Custom software development	44.63%	0%

DR GOV-1 – Role of the administrative, management and supervisory bodies

The governance structure at Banca Transilvania comprises: the supervisory body - the Board of Directors, consisting of 7 non-executive members, and the senior executive management - the Leaders' Committee, consisting of 8 executive members, hereinafter collectively referred to as the management bodies.

At the level of the subsidiaries included in the BT Group, the governance structure is similar and is presented in the section dedicated to each of them below.

The members of the Board of Directors (BoD) are elected by the shareholders during the General Meeting of Shareholders (GMS) for a period of 4 years, in accordance with the provisions of the specific regulations issued by the NBR, the authority responsible for guidance, coordination, supervision, and control. In addition, it undertakes analyses and establishes programs for specific periods of the financial year, with the aim of ensuring the Bank's appropriate development in the market.

Within the Bank, it has the following structure:

- Chairman of the Board of Directors,
- Vice Chairman of the Board of Directors,
- 5 directors – members of the Board of Directors.

Details regarding the composition of the Board of Directors, roles and responsibilities, as well as information about the Committees under its authority, are available in Chapter 8, Corporate Governance.

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71.43% of the members of the Board of Directors are independent.

0.4 is the diversity ratio at the level of the Board of Directors,
with 28.5% women and 71.5% men.

Composition of the Board of Directors by gender and age

BT Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
Under 30	0	0	0	0	0	0
30–50 years	0	0	1	14.29	1	14.29
>50 years	2	28.57	4	57.14	6	85.71
Total	2	28.57	5	71.43	7	100.00

The members of the Leaders' Committee (LC) are appointed by the Board of Directors and are required to meet the legal conditions, respectively to be approved by the NBR prior to the effective commencement of their mandate.

At the level of the Leaders' Committee, employees and human resources matters are also represented through the Human Resources Director, who reports directly to the CEO.

Details regarding the composition of the Leaders' Committee, roles and responsibilities, as well as information on the Committees under its authority, are available in Chapter 8, Corporate Governance.

The gender ratio on the Leaders Committee is 0.14,
with 12.5% women and 87.5% men.

Composition of the Leaders' Committee by gender and age

BT Leaders' Committee	Women		Men		Total	
	No.	%	No.	%	No.	%
Under 30	0	0	0	0	0	0
30–50 years	1	12.5	4	50.0	5	62.5
>50 years	0	0	3	37.5	3	37.5
Total	1	12.5	7	87.5	8	100.0

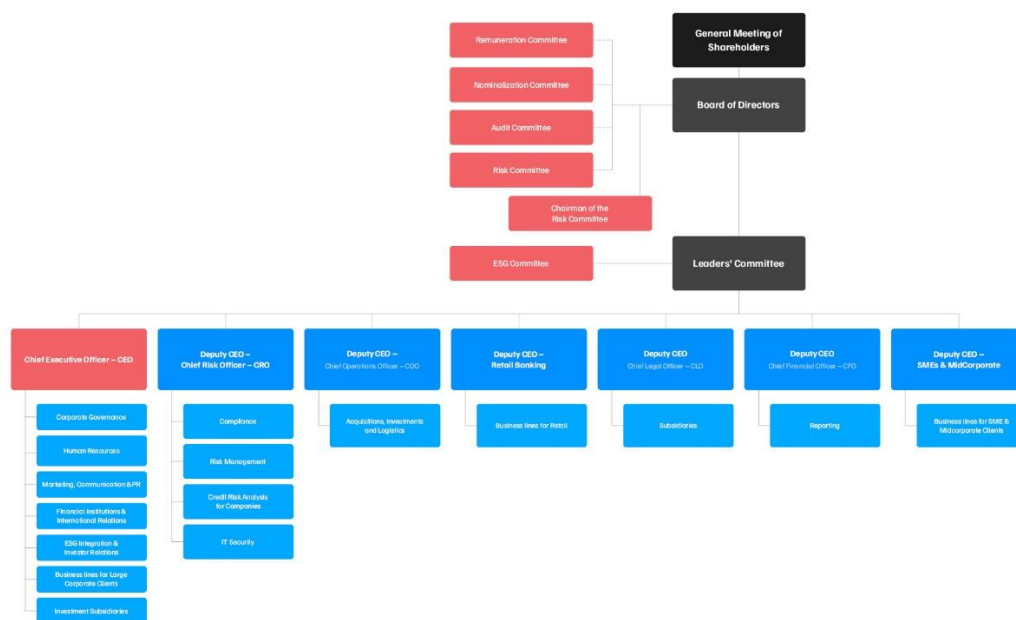
With regard to the knowledge, skills, and experience of the management body, within Banca Transilvania, the Nomination Committee is responsible for assessing these in accordance with the principles and policies for staff nominations, which must be aligned with the Bank's strategy and values.

The rules governing the assessment of the adequacy of the knowledge and skills of the members of the management are also applied at the level of subsidiaries, in compliance with the principle of proportionality. Where a subsidiary does not have a Nomination Committee, its responsibilities are assigned to the Board of Directors. Considering the reduced impact and complexity of subsidiaries, the adequacy assessment targets only members of the management (directors and executives, where applicable). Subsidiaries issue their own regulations and apply simplified rules, depending on the specifics of their activities, while adhering to the general principles. In the case of specific legal requirements, these take precedence over the Group's internal provisions.

The governance structures at the level of BT Group subsidiaries as of 31 December 2025, are presented in Addendum 3.

Sustainability Governance

Banca Transilvania Governance Structure



The governing bodies play an essential role in overseeing the Bank's business conduct, ensuring the integration of ethical standards, compliance frameworks, and governance principles into all aspects of operations. Among the main responsibilities of these bodies are the establishment and periodic review of ethical standards and policies, such as the Code of Conduct, anti-corruption policies, and fair competition policies, thereby ensuring compliance with international standards. They oversee the implementation of compliance frameworks to ensure adherence to regulatory requirements and best practices in combating money laundering, bribery, and the protection of personal data. They also monitor the effectiveness of internal controls and whistleblowing mechanisms. The governing bodies are responsible for integrating ESG (environmental, social, and governance) principles into the Bank's activities, including with regard to human rights and social responsibility. These bodies are composed of experts with diverse qualifications, providing oversight and strategic guidance for business conduct. Their responsibilities are reflected in the suitability assessment policy for members of the governing bodies of Banca Transilvania and the BT Group.

The General Shareholders' Meeting (GSM) is the highest decision-making authority, providing strategic direction and approving major decisions affecting the Bank's governance and operations. The GSM sets organizational objectives, which include ESG

initiatives, and allocates resources by approving the annual budget to achieve these objectives.

The Board of Directors holds the ultimate authority for overseeing the Bank's strategic direction, including material impacts, risks, and opportunities, and monitors the implementation of the sustainability strategy and compliance with ESG standards across all activities of the BT Group, in both lending and internal operations. The Board periodically reviews ESG performance and alignment with the Sustainable Development Strategy, ensuring that relevant risks and opportunities are adequately managed. The Chair of the Risk Management Committee oversees the implementation of the ESG strategy and its integration into risk policies.

The Audit Committee verifies compliance with applicable ESG regulations.

The Risk Management Committee is responsible for conducting a rigorous assessment of key and emerging risks, including those related to sustainability and governance, that could threaten the Group's capital adequacy and solvency. The Committee is tasked with ensuring that the risk management framework aligns with the business strategy, which includes integrating ESG risks into the decision-making process and organizational culture, thereby promoting a proactive approach to managing these risks. This contributes to fostering a culture of risk-taking and achieving robust governance within the Group.

The Leaders' Committee is responsible for the Bank's operational management and implements the strategies established by the Board of Directors, including the ESG strategy. It also handles the assessment and management of operational risks and opportunities that arise in the course of business.

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

Composed of experienced leaders who oversee the structures responsible for sustainability, the Committee oversees ESG initiatives to ensure they align with the organization's long-term objectives. It also identifies relevant risks and opportunities, providing guidance on how to address them, and assigns ESG-related tasks to the appropriate units within the Bank, thereby facilitating the implementation of the approved ESG strategy.

ESG responsibilities are distributed across several relevant departments of the Bank, with **the Investor Relations & ESG Integration Department** serving as the coordinator.

The main categories of responsibilities in this regard include:

- Overseeing and implementing the Bank's sustainability and responsible business policies, practices, and initiatives.
- Defining and updating the sustainability strategy, as well as managing ESG reporting, including the preparation of the sustainability statement.
- Granting green loans and other sustainable financing solutions, in accordance with the internal eligibility framework and the objectives set out in the sustainability strategy.
- Providing the information necessary to obtain an ESG rating.
- Developing the methodology for estimating emissions from the Group's own operations (direct and indirect) and emissions related to the Group's loan portfolio (financed emissions).
- Developing and implementing the prudential transition plan and the climate transition plan.
- Analyzing risks related to corporate clients from an ESG perspective (climate risk - physical and transition, environmental risk, social risk, governance risk).
- Establishing annual training plans for developing ESG & Sustainability competencies across the Group.
- Monitoring, analyzing, and implementing changes to the legislative framework relevant to ESG and sustainability issues.
- Developing the methodology for applying the EU Taxonomy Regulation and reporting indicators in accordance with this regulation.
- Ensuring the governance framework for integrating ESG aspects into decision-making processes.
- Coordinating the process of joining relevant domestic and international organizations.

The Investor Relations & ESG Integration Department acts as a catalyst for embedding sustainability and responsible practices within the organization. It also helps secure financing from financial institutions, acting as a "project manager," and maintains effective communication channels to facilitate transactions that support the Bank's business development and meet its requirements. In addition, it coordinates the initiation, organization, and completion of due diligence processes, ensuring the archiving and retention of documentation, managing the relationship with the counterparty, and collaborating with all involved departments.

The department also manages M&A opportunities from a business perspective, assuming the role of project manager and coordinating the preparation of necessary materials. Depending on the case, it is involved in pre- and post-transition activities from a business perspective.

In its investor relations, the department aims to maintain high-quality and continuous communication, thereby promoting the Bank's image both internally and internationally.

SME and Corporate Business Line

Within the SME and Corporate Business Line, each department has at least one person with responsibilities in the area of sustainability. Thus, the units responsible for product development, specialized sectors, and the coordination of the SME and micro-client segment or medium-sized corporate clients have specific resources allocated to implement strategic sustainability objectives.

In 2022, the Green and Sustainable Loans Department was established, with objectives that extend across all lending lines for corporate clients, including large corporate clients, corporate clients, and SMEs. Its main responsibilities include:

- Initiating and maintaining collaboration with national and international authorities in the field of green finance.
- Proposing Internal Rules of Procedure for lending to clients investing in green projects.
- Promoting the products and services developed by the department.
- Creating programs and products dedicated to sustainability and organizing training sessions for employees.
- Identifying clients and promoting financing alternatives for green projects.
- Participating in the development of Banca Transilvania's sustainability strategy.
- Supporting the implementation of the Bank's sustainability strategy, with the aim of growing the portfolio of green and sound loans.

Retail Banking Business Line

Within the Retail Banking business line, there are specific responsibilities for implementing objectives related to retail products and services, including green products or those with sustainability components, as well as responsibilities for monitoring, implementing, and reporting on relevant regulations.

Large Corporate Clients Business Line

The Large Corporate Clients business line, where there are responsibilities to address and manage the expectations of the most sophisticated client segment, with complex financing, including from an ESG perspective.

Support Functions in Banca Transilvania's Departments

The Deputy CEO, CRO, oversees:

- A dedicated environmental and social risk analysis unit with the following responsibilities: developing environmental policy, assessing environmental and social risks associated with financing as part of credit risk analyses for clients, monitoring environmental and social incidents reported by clients, and providing support and advice to colleagues on ESG issues.
- The non-financial and ESG risk management unit is responsible for analyzing trends and identifying emerging risks caused by market changes and macroeconomic conditions, including risks related to climate change.

The Procurement Department (reporting to the Deputy CEO, COO):

- manages procurement, investment, and logistics activities at the Bank and its subsidiaries.
- integrates ESG criteria into procurement methodologies and regulations, including in the selection and evaluation processes for BT Group suppliers.
- contributes to managing the Bank's environmental impact by monitoring and evaluating resource consumption and coordinates the calculation of direct and indirect greenhouse gas emissions related to Scopes 1, 2, and 3, in accordance with the GHG Protocol.
- Identifies and implements measures to improve consumption efficiency, with the aim of reducing operational costs and mitigating the negative environmental impact.

Reporting (reporting to the Deputy CEO, CFO):

- Coordinates financial reporting and contributes to sustainability reporting, including in areas such as the EU Taxonomy and CRC requirements.
- facilitates the alignment of reporting processes with applicable regulatory requirements, relevant standards, and current best practices, and supports the collection, consolidation, and validation of financial information required for sustainability reporting, in coordination with the relevant departments.

Senior Executive Director, Corporate Governance and Non-Credit Legal:

- coordinates a unit with specific responsibilities regarding non-financial reporting in accordance with industry best practices and internationally recognized standards
- ensures the governance framework that supports the integration, monitoring, and oversight of ESG aspects in lending activities and decision-making processes.
- coordinates the integration of ESG criteria into executive nomination processes and contributes to establishing the ESG performance indicators used in compensation policies

- monitors, evaluates, and contributes to the development of measures to reduce the gender pay gap as part of the governance framework and human resources practices.

Senior Executive Director of Human Resources:

- coordinates resources dedicated to social sustainability issues, with a focus on the Group's workforce, and ensures the integration of human rights principles into human resources policies and practices, including non-discrimination and equal opportunity.
- coordinates employee training and professional development initiatives in line with sustainability objectives, promotes an inclusive work environment, and leverages the benefits of diversity within the workforce.
- Develops and implements initiatives to increase employee engagement, designed to support professional and personal well-being and contribute to achieving business unit objectives.

Executive Director of Marketing, Communications, and Customer Experience:

- coordinates corporate social responsibility (CSR) activities at the BT Group level
- ensures the integration of ESG aspects into the Group's internal and external communications and coordinates messages and communication materials regarding sustainability initiatives, in line with the Group's strategy and governance framework.
- supports transparency and consistency in communication with stakeholders regarding ESG and sustainability issues.

At the Bank level and covering the entire spectrum of activities, representatives of these structures form an internal working group coordinated by the CEO. Without becoming a formalized structure, the working group meets periodically to implement the Bank's sustainability strategy and promotes effective interdepartmental collaboration, shares knowledge, analyzes initiatives, and reports on progress related to each strategic objective, either through the Sustainability Statement or via internal communications.

Sustainability Governance within Subsidiaries

Each subsidiary of the BT Group has designated a person responsible for sustainability. These individuals meet periodically with the Bank's working group and maintain contact with it to align the implementation of sustainability initiatives and ensure the coordination of activities and projects in this area.

BT Microfinanțare IFN S.A. (BT Mic): follows the strategic objectives established at the level of the BT Group, which also apply to subsidiaries, and has voluntarily developed its own ESG strategy. This strategy is integrated into the company's business strategy and is subject to an annual review process. At the executive level, the Executive Management Committee is responsible for implementing the objectives of the ESG strategy through the

relevant departments and the designated person with specific responsibilities in this area. The adopted governance model supports the prioritization of objectives resulting from consultation with the company's stakeholders - customers, employees, investors, shareholders, and regulatory authorities - while also monitoring the objectives and performance indicators established at the BT Group level.

BT Capital Partners S.A. (BTCP): integrates ESG principles into its strategy and activities, in line with the policies and sustainability framework of the BT Group. The company's management is responsible for adopting and implementing relevant strategic directions in the field of sustainability, ensuring that operational and decision-making processes reflect the governance, environmental, and social requirements established at the Group level. The person designated for sustainability maintains contact with the Group and contributes to the coordination of ESG initiatives and reporting.

BT Pensii Societate de Administrare a Fondurilor de Pensii Private S.A.: within BT Pensii, sustainability governance is coordinated at the executive management level, which is responsible for implementing the sustainability strategy in line with the guidelines established at the BT Group level and with the regulations applicable to the private pension fund sector. The company has designated an ESG responsible, whose role is to monitor the integration of environmental, social, and governance principles into operational processes, as well as to collaborate with the Group to align specific reporting and initiatives.

BRD Pensii Societate de Administrare a Fondurilor de Pensii Private S.A. (BRD Pensii): Acquired at the end of 2025, the subsidiary is in the process of developing and implementing its own sustainability governance framework, aligned with the ESG governance model of BT Group.

BT Direct IFN S.A.: follows the sustainability strategy of Banca Transilvania Group and contributes data for the preparation of the Group's consolidated financial statements and reports. The company aims to integrate ESG principles into its operational model and business strategy, maintaining its commitment to generating a positive impact on social and environmental aspects through the objectives set out in its own Sustainable Development Strategy. At the level of the Board of Directors and Management, in 2025, BT Direct's Sustainability Policy and the Sustainable Development Strategy for the period 2025–2027 were approved, documents which strengthen the directions of action and the governance framework regarding sustainability.

BT Asset Management SAI S.A. (BTAM): follows the Banca Transilvania Group's sustainability strategy and contributes with data to the preparation of the Group's consolidated financial statements and reports. The company aims to integrate ESG principles into its operational model and business strategy, maintaining its commitment to generating a positive impact on social and environmental issues, in line with the objectives set out in the Group's Sustainable Development Strategy. Governance of sustainability issues is ensured at the level of the management bodies and is reflected in the company's

internal policies and procedures. BT Asset Management communicates to investors and all stakeholders the focus of the BT Maxim, BT Technology, and BT Real Estate Funds on investments that promote environmental, social, or a combination of these characteristics, in accordance with Article 8 of EU Regulation 288/2019 on the disclosure of sustainability-related information in the financial services sector, known as the Sustainable Finance Disclosure Regulation ("SFDR"). Information regarding BT Asset Management SAI's sustainability initiatives is available on the company's website, [here](#).

SALT Bank S.A.: Sustainability activities are aligned with the ESG strategy and initiatives implemented at Banca Transilvania. The coordination of ESG initiatives and strategy is carried out at Banca Transilvania, based on collaboration and information provided by SALT, in accordance with the BT Group's policies on group relations, approved and ratified by the Board of Directors of Salt Bank.

Victoriabank S.A.: Sustainability governance is exercised at the level of the Board of Directors of Victoriabank S.A. (BoD), which is responsible for overseeing the integration of ESG aspects into the bank's strategy, policies, and decision-making processes. The Board approves strategic guidelines relevant to sustainability, including social and environmental policies, and monitors their implementation in alignment with business objectives and the risk management framework. The Board of Directors periodically assesses the effectiveness of the bank's ESG governance framework and ensures its alignment with applicable regulatory requirements and the bank's long-term interests. Additionally, the Board oversees compensation policies, including principles relevant from a sustainability perspective, to support responsible and balanced performance.

BT Leasing MD S.R.L.: Integrates ESG principles into its governance framework and operational activities, in line with the policies and sustainability framework of the BT Group. The entity applies the strategic directions established at the Group level, incorporating sustainability criteria into financing processes and decision-making mechanisms. Responsibility for coordinating and overseeing sustainability matters rests with the CEO, in his capacity as sole executive officer, who ensures alignment with the Group's internal requirements and monitors the integration of ESG factors into the company's strategy and operations.

O.C.N. Microinvest S.R.L. (Microinvest): Sustainability governance is integrated into the company's overall management framework and reflects how strategic decisions are made, risks are managed, and compliance with legislative, supervisory, and BT Group requirements is ensured. The management structure includes the General Meeting of Shareholders, the Board of Directors, and the Chief Executive Officer, each with well-defined responsibilities for overseeing, coordinating, and implementing strategic objectives. Together, they form a governance system focused on transparency, accountability, and operational continuity.

In addition to this structure, Microinvest benefits from a number of specialized committees that support good governance and contribute to the consistent monitoring of risks, compliance, and operational performance. Among these, the ESG Committee plays a central role, being responsible for tracking the implementation of sustainability requirements, assessing social and environmental impact, analyzing green portfolios, and proposing measures to improve ESG performance. The Committee comprises the ESG specialist and at least two members of the senior management team, reflecting the company's commitment to integrating ESG principles into decision-making and operational processes.

INNO Investments S.A.I. S.A. (INNO Investments): follows the Banca Transilvania Group's sustainability strategy and contributes its own data to the preparation of the Group's consolidated statements and reports. The company aims to integrate ESG principles into its operational model and business strategy, maintaining its commitment to generating a positive impact on social and environmental aspects, in line with the objectives set out in the GFTB Sustainable Development Strategy. INNO Investments communicates to investors and all interested parties the Innovation Fund's focus on investments that promote environmental, social, or a combination of these characteristics, in accordance with Article 8 of EU Regulation 288/2019 on the disclosure of sustainability-related information in the financial services sector, known as the Sustainable Finance Disclosure Regulation ("SFDR").

BT Broker de Asigurare S.R.L. (BT Broker): The CEO, in his capacity as the sole executive officer of BT Broker, is responsible for overseeing how the company manages ESG impacts and for ensuring responsible management of its activities. He acts in accordance with the company's Internal Rules of Procedure and ensures that BT Broker is aligned with the sustainability policies, practices, and initiatives implemented at the Group level. Currently, the company has not designated specific responsibilities for a separate sustainability function; however, the CEO ensures compliance with the decisions of the Board of Directors and the General Meeting, as well as the integration of ESG requirements into operational activities.

BT Leasing Transilvania IFN S.A. (BTL): BT Leasing follows the Banca Transilvania Group's sustainability strategy and contributes its own data to the preparation of the Group's consolidated financial statements and reports. The company integrates ESG principles into its operational model, maintaining its commitment to generating a positive impact on environmental and social issues. Responsibilities related to ESG and sustainability are assigned to the Risk Division. The Deputy CEO for Risk and Compliance is responsible for coordinating sustainability matters in accordance with the internal regulatory framework. Internal environmental and financing policies define how to assess the environmental risk associated with clients, based on their profile and the economic sector in which they operate. Environmental risk is integrated into the client's overall risk profile.

The Sales Division is responsible for allocating resources to green financing, contributing to the growth of the portfolio of products with a positive environmental impact.

DR GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Informing management bodies on sustainability-related issues

The management bodies of BT Group are informed about sustainability-related issues through:

- Periodic reports (monthly/quarterly/annual) issued by the relevant departments, including the status of key performance indicators (KPIs), risks, and progress made toward achieving sustainability goals,
- Specialized sustainability reports addressing specific topics such as material impacts, risks, and opportunities, prepared in accordance with applicable legislation, such as the CSRD Directive and the EU Taxonomy Regulation,
- Ad hoc meetings for specific situations requiring immediate decisions and approvals;
- Whenever a decision to be taken by the management body has a potential significant and negative impact in the ESG sphere, it must receive from the Leaders' Committee, or from another competent body within the bank, an analysis of how this decision aligns with the Company's sustainability objectives and ESG policies, or a proposal for measures to mitigate the negative ESG impact.

The Bank's business strategy incorporates coherent sustainability objectives, monitored through key performance indicators across the following strategic areas: economic performance, people, and the environment. The objectives, formally defined in Banca Transilvania's Sustainability Strategy, determine the actions and measures necessary to address material impacts, risks, and opportunities.

The impacts, risks, and opportunities addressed by management during the reporting period included the following:

- Sustainable financing and supporting the green transition: expanding the range of green and sustainable financial products, by granting green loans to legal entities and individuals, as well as issuing green bonds that contribute to supporting responsible entrepreneurship by financing and refinancing projects that enable the transition to a low-carbon and climate-resilient economy and/or that create a positive impact on society and mitigate social issues. To support these efforts, the Group has developed [the Sustainable Finance Framework](#), a document that defines the green and social instruments the Group may issue and the eligibility criteria for the financing it provides from the resources it manages, offering a unified structure for the classification and reporting of sustainable finance instruments.

- Climate change and environmental impact: monitoring Group-level financed emissions, as well as environmental, physical climate, and transition risks associated with the Bank's corporate loan portfolio.
- Employees and the community: ensuring fair labor practices, such as adequate compensation, occupational safety and health, professional training, diversity, equity, and inclusion (DEI), and community engagement to enhance financial literacy. At the same time, supporting the entrepreneurial ecosystem (microfinance, startups) through various means was also addressed.
- Regulatory compliance: Adapting to evolving EU sustainability reporting standards (CSRD and ESRS) and ensuring alignment with reporting obligations, including the EU taxonomy and the SFDR.

Developing the appropriate skills and expertise to oversee sustainability aspects

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

- Direct experience: Members of the Board of Directors and the executive management team oversee structures that include specialists with relevant experience in managing environmental, social, and governance (ESG) issues, such as: specialists in climate risk, supply chain sustainability, sustainable finance, human resources, etc.
- Access to external expertise: When additional expertise is needed, management collaborates with external experts and leading industry organizations to obtain analysis and guidance on specific sustainability topics.
- Training and professional development: BT offers targeted training sessions on sustainability topics and encourages participation in external workshops, conferences, and webinars to continuously improve the sustainability expertise of management bodies.
- Ongoing assessment of expertise needs: The Governance Department, the Human Resources Department, and the Nomination Committee regularly assess existing skills and expertise to ensure they meet the company's needs. If these are not available internally and cannot be developed through training and professional development or by accessing external expertise, the company engages in recruitment processes.

GOV-3 – Integration of sustainability-related performance in incentive schemes

Principles for sustainability-related remuneration for members of the administrative, management, and supervisory bodies

The performance of management bodies is linked to specific sustainability objectives or impacts, the achievement of which is reflected in the remuneration of their members. The use of such individual performance objectives ensures alignment between the bank's

remuneration practices, the interests of senior management, and the bank's overall sustainability and responsibility objectives. ESG objectives are rated on a scale of 1 to 5, influencing the decision to grant or withhold the corresponding variable remuneration.

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

The remuneration of the members of the Board of Directors is determined by the General Meeting of Shareholders. In accordance with the applicable legal provisions regarding sound remuneration policies, members of the management body in its supervisory function (the Board of Directors) are remunerated exclusively with fixed remuneration, precisely to adequately address conflicts of interest and to eliminate potential incentive mechanisms based on the institution's performance (taking into account the guidelines of the European Banking Authority – EBA). Also, in accordance with EBA provisions, as Banca Transilvania is a listed company, it stipulates that remuneration be paid partly in RON and a significant portion in shares through a stock option plan, within the maximum limits approved by the General Meeting of Shareholders. Shares are allocated after a vesting period of at least one year and are not performance-based, promoting sound governance and risk management practices.

The annual performance of the members of the Leaders' Committee is evaluated according to the SMART objectives' methodology, with performance evaluation criteria taking into account a sufficient period of time to measure actual performance, using criteria that can be quantified, both qualitative and quantitative. Among the established SMART objectives is the achievement of key performance indicators (KPIs) related to sustainability, details of which are presented in the Appendix – Remuneration Report.

Members of the Leaders' Committee receive a fixed monthly remuneration approved in accordance with corporate and legal regulations, and they also receive variable remuneration paid in annual installments, with the first installment paid immediately in the year following the one for which the objectives were set and the majority of it deferred over a 5-year period.

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

BT's remuneration policy for members of the Board of Directors and the Leaders' Committee is based on accountability, alignment of incentives, and the stability of the Bank. This mechanism is approved by the General Meeting of Shareholders or the Board of Directors, with the advice of the Remuneration Committee, as applicable.

DR GOV-4 – Statement on due diligence

Basic elements of due diligence processes (due diligence)	Page in the sustainability statement
a) Integration of due diligence processes into governance, strategy, and the business model	21, 116, 146–153
b) Involvement of affected stakeholders in all key stages of due diligence processes	33–34, 149–151
c) Identification and assessment of negative impacts	49–53
d) Implementation of measures to address these adverse impacts	77, 82–83, 105–106, 125–130
e) Monitoring the effectiveness of these efforts and communicating the results	9, 78, 100, 106, 120–122, 131

DR GOV-5 – Risk management and internal controls over sustainability reporting

Risk management system and internal controls for the sustainability reporting process

The risk management and internal control system for sustainability reporting at Banca Transilvania includes the following main components:

- **Governance and Oversight:** The Board of Directors, supported by dedicated sustainability and risk management structures (primarily the ESG Committee), is responsible for ensuring that sustainability-related risks are identified and managed appropriately within the reporting process.
- **Policies, procedures, and methodologies:** These form the basis of sustainability reporting and are periodically reviewed and updated to align with evolving regulatory requirements (e.g., the EU Taxonomy).
- **Data collection and verification:** At the Bank level, the departments involved in the sustainability reporting process coordinate the collection and verification of data from each subsidiary within the Group.
- **Internal Audit:** The Internal Audit Department ensures the existence of adequate internal control mechanisms, including with regard to the sustainability reporting process, by verifying data compliance, the traceability of sources, and adherence to internal procedures for validating reported information.

Key identified risks, their assessment, and control measures

Risk category	Description	Probability level	Impact	Control measures
Data accuracy	Incorrect, incomplete, or inconsistent data; lack of traceability.	Low	High	Clear procedures for data collection and validation; internal audit.
Definition of indicators	Unclear methodologies, inconsistent application of standards.	Low	Medium	Internal standardization and training for the teams involved.
Quality of IT systems	Unadapted IT systems, lack of integration between data sources.	Medium	Medium	Investments in integrated systems and ESG digitization.
Governance and accountability	Unclear responsibilities, lack of clear internal controls.	Low	High	Clarification of roles and responsibilities; oversight by the Board of Directors.
Legal non-compliance	Non-compliance with ESRS, CSRD, taxonomy, and SFDR requirements.	Low	High	Legislative monitoring, periodic updating of the reporting framework.
Outdated information	Reporting based on historical data due to reporting lags between entities.	Medium	Medium	Recurring process of reviewing ESG content and policies.

Integration of findings into internal functions

Findings resulting from the assessment of risks associated with the sustainability reporting process, as well as from internal control activities, are directly integrated into the Group's relevant functions and processes. In 2025, these included improving ESG data collection and validation procedures, adjusting internal reporting policies, and updating methodological manuals, such as:

- DMA Methodology
- Calculation of the carbon footprint and financed emissions
- Methodology for reporting indicators in accordance with the EU Taxonomy
- Methodology for Calculating the Gender Pay Gap

The involved departments are collaborating to translate the findings into concrete corrective measures, which are implemented and monitored through agreed-upon action plans.

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

1.3 Strategy and Business Model

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

The BT Group operates in two countries, with the most significant activity taking place in Romania, accounting for over 95% of total assets. The other country where the BT Group operates is the Republic of Moldova, where the BT Group, through its subsidiaries detailed in the table in Chapter 1.1 “Basis for the Preparation of the Sustainability Statement,” provides banking and financial leasing services, and Italy (through a bank branch opened in Rome).

The Group offers a diverse range of financial services through its specialized entities. **Banca Transilvania**, **Victoriabank**, and **Salt Bank** offer a wide range of financial products and services for individuals and businesses, including loans and specialized financing products, cards, savings and investment solutions, distribution of insurance, savings, and investment products, digital payment solutions, private and premium banking services, cash management services, and electronic platforms. **BT Leasing Transilvania IFN S.A.** and **BT Leasing MD** offer auto leasing, including for electric and hybrid vehicles, as well as equipment and agricultural leasing. **BT Capital Partners** provides investment services for individuals and complex financial solutions for companies, including mergers, acquisitions, and corporate financing. **BT Direct** is active in the consumer credit sector, such as credit cards and personal loans. **BT Asset Management and INNO Investments** manage a variety of investment funds, ranging from fixed-income funds to multi-asset and equity funds. **BT Microfinance and O.C.N. Microinvest S.R.L.** offer microfinance products, including in the agricultural and educational sectors, benefiting from support through European programs such as InvestEU and other international financial mechanisms focused on financial inclusion, economic development, and sustainable transition. **BT Pensii** and **BRD Societate de Administrare a Fondurilor de Pensii Private** manage private pension funds under Pillar III and Pillar II, respectively, contributing to the development of the local private pension market and supporting long-term savings. **Improvement Credit Collection** specializes in debt collection and recovery services, including through non-judicial or enforcement proceedings. **BT Insurance Broker** offers brokerage services for insurance related to leasing contracts and claims consulting.

Active Customers Banca Transilvania	2025	2024	Trend 2025 vs. 2024
Individual Customers	4,448,962	4,088,119	+8.82%
Micro Business Customers	499,164	448,472	+11.30%
SME Customers	26,218	25,002	+4.86%
Medium-sized Corporate Customers	9,029	8,761	+3.05%

Large Corporate Customers	1,750	1,509	+15.97%
Total	4,985,123	4,571,863	+9.03%

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

Banca Transilvania	2025	2024	Trend 2025 vs. 2024
No. of Branches	531	513	+3.50%
No. of ATMs	2,031	1,937	+4.85%
No. of POS terminals	178,414	148,000	+20.55%
No. of MFMs	696	651	+6.91%
Cards	8,145,668	7,172,201	+13.57%
Unique users on digital channels	4,928,070	4,435,953	+11.09%

- Banca Transilvania's customer portfolio continued to expand at a steady pace in 2025, recording growth across all customer segments, once again demonstrating its status as a universal bank in Romania.
- The number of individual customers reached 4,448,962, compared to 4,088,127 in the previous year, marking an increase of 8.83%.
- The corporate segment, in turn, recorded positive growth, with the bank serving 536,161 companies in 2025, compared to 483,744 in 2024, reflecting an annual increase of 10.84%. Within this segment, the dynamics of the sub-segments highlight the consolidation of the corporate client base. The number of micro-businesses served rose to 499,164 (vs. 448,472, +11.30%), that of SMEs to 26,218 (vs. 25,002, +4.86%), and the category of medium-sized corporate clients reached 9,029 (vs. 8,761, +3.06%). The large corporate client segment recorded one of the most significant increases, reaching 1,750 companies in 2025 (vs. 1,509), corresponding to a 15.97% increase.
- Banca Transilvania is the market leader in the card sector, with 8.1 million cards in its portfolio, of which 769,000 are credit cards. Purchases made with these 8.1 million cards increased by 19% compared to the previous year.
- In 2025, over 470,000 individuals became BT customers, in addition to the more than 130,000 customers who migrated following the integration of OTP Bank Romania. A significant portion of the customers newly enrolled in 2025 chose to open their accounts directly through the BT Pay app, without visiting a bank branch.

- BT has 4.9 million unique digital customers. These customers use the internet and mobile banking services, BT Pay and BT Go. We are seeing a clear trend of growing interest in digitalization, with customers increasingly preferring innovative solutions that allow them to easily and efficiently manage financial services in the digital environment, such as virtual cards, credit and savings products, insurance, investments, and private pensions.
- The bank has reached over 5.7 million unique cards enrolled in BT Pay, Apple Pay, Google Pay, Fitbit Pay, and Garmin Pay, and the number of mobile payments at merchants in 2025 increased by 29% compared to 2024. At the same time, money transfers from cards enrolled in BT Pay are increasingly popular, with their volume rising by 70% compared to the previous year.
- As for the volume of non-card transactions made by individual customers through digital channels, it recorded a 24% increase compared to the previous year.
- As of December 31, 2025, the Bank operates a network of 2,031 ATMs, of which 696 are multifunctional machines. The Bank also operates 577 BT Express terminals used for various transactions other than cash withdrawals, has over 178,000 POS terminals installed, 40,000 STAR partner locations, and collaborates with over 8,000 e-commerce merchants compared to 7,118 in the previous year, representing a 13.80% increase.
- Banca Transilvania's branch network continued to expand in 2025, reaching 531 branches, compared to 513 in the previous year. This expansion, equivalent to a 3.51% increase, reflects the institution's commitment to remaining close to the communities it serves and to facilitating access to financial services for an ever-growing number of customers.
- By the end of 2025, Chat BT had surpassed 1.5 million interactions. Thanks to continuous optimizations, including quick and intelligent responses, multilingual support (RO, EN, IT, HU), dynamic personalization, access to tutorials and resources, and tailored insights, by the end of the year, over 80% of customers were able to find the information they needed on their own, and 20% of conversations are handled by a consultant (live chat conversion rate: 20%).
- The Premium segment grew in 2025 to approximately 150,000 Premium and Private customers and was expanded nationwide. BT now has Relationship Managers dedicated to Premium customers in most urban centers and a dedicated team of Virtual Relationship Managers nationwide. The Premium Banking offering was enhanced in 2025 with the launch of an exclusive product dedicated to Premium customers - the Premium Club Subscription.
- Starting in August 2025, Banca Transilvania customers can enroll directly, via the BT Pay app, in the voluntary pension funds (Pillar III) managed by BT Pensii. Since the launch of this feature, over 8,600 customers have chosen to save for the long term in one of the two voluntary pension funds, Pensia Mea and Pensia Mea Plus.

BT Mic

BT Microfinanțare IFN S.A. (BT Mic) is the BT Group’s microfinance entity, established in 2016 with the aim of supporting access to financing for entrepreneurs in Romania. Its business model is built around supporting entrepreneurial initiatives, with BT Mic targeting small businesses and individual entrepreneurs, considered essential drivers of economic development, innovation, and the strengthening of local communities.

The product offering is tailored to the specific needs of small businesses and covers requirements such as working capital financing, investments, or other operational needs. The loan approval process is supported by a digital approach, including the use of the “Raul” chatbot, which helps simplify customer interactions and increases the accessibility and efficiency of the financing process.

By integrating flexible financial solutions with digital tools and maintaining a constant focus on entrepreneurs’ needs, BT Mic contributes to the implementation of Banca Transilvania Group’s strategy to expand financial inclusion, stimulate the real economy, and support sustainable economic growth at the local and national levels.

Active Customers BT MIC	2025	2024	Variance 2025 vs. 2024
Micro business	26,573	22,160	+19.91%

Salt Bank

Salt Bank is the first “neobank” developed entirely in Romania, a fully digital financial institution that aims to redefine the interaction between customers and banking services. Launched in March 2024, the bank primarily targets individuals with above-average incomes and stable financial situations often referred to as the “mass affluent” segment, (i.e. people who can save and invest consistently) as well as young professionals in urban areas. All products and services are offered exclusively through a modern and efficient mobile app.

With a mission to represent “a leap in banking and a leap in technology, for those who don’t want to be stuck in their bank,” Salt Bank aims to offer relevant financial solutions built around an intuitive platform, competitive products, and a high level of security for customer data and funds. All services are developed based on three strategic pillars: ease of use, product quality, and operational security.

Salt Bank places special emphasis on the user experience, offering a clear, easy-to-navigate digital interface alongside cards with a distinctive design. Customer support is managed through a dedicated center - the Care Center - where interactions are characterized by professionalism, promptness, and a communication style aligned with the

brand's values. All communication channels, from the app to customer service, are aligned to maintain a consistent, modern, and user-friendly identity.

The year 2025 had three strategic objectives: attracting customers, continuing to deliver new features and expanding the product range with financing solutions, as well as initiating cost control. These were supplemented by a series of quantitative and qualitative objectives.

The product portfolio has experienced rapid growth since the bank's launch in March 2024 to the present. This expansion of offerings has directly contributed to an increase in the number of customers and a surge in transactional activity through the SALT mobile app.

Compared to the features already launched the previous year, in 2025 the SALT app added new ones such as:

- paying utility bills directly within the app (PayBill)
- subscription manager - a service that provides customers with information about the merchants where they save their cards/subscriptions
- roadside assistance
- call monitor – an anti-fraud tool that notifies the customer of a call from the bank
- consumer loans for individuals
- Help Mama – a protection tool for senior customers
- sale of auto liability insurance
- deposits in EUR and USD for individuals
- card top-up via Google Pay and Apple Pay
- integration with Ropay (payments based on the recipient's phone number)
- investments in mutual funds, foreign stocks, and exchange-traded funds (ETFs)
- instant receipts and payments in euros.

In addition to the above, while the product offering was previously aimed solely at individuals until 2024, starting in 2025, Salt Bank has diversified its products to include the "freelancer" segment, offering a checking account, business card, payment features, integration with electronic billing services, and savings accounts.

Investments in mutual funds, stocks, and ETFs have become a central element in the bank's service ecosystem. These provide customers with access to a diverse range of financial instruments traded on international exchanges, updated in real time within the app, thereby strengthening Salt Bank's position as a provider of high-value-added digital services.

In terms of customer numbers, Salt Bank nearly doubled its customer base in 2025, reaching 747,505, up from 393,296 at the end of 2024, placing Salt Bank among the top 10 credit institutions in Romania by number of customers. The volume of deposits and checking accounts held by the bank's customers reached 1.78 billion RON, representing an 87% increase compared to 2024. The net loan portfolio reached 377 million RON, with the

bank's portfolio currently featuring personal loan products, which have seen rapid growth since their launch in April 2025.

At the same time, Salt Bank's total assets saw significant growth, reaching 2,229,682,143 RON in 2025, compared to 1,262,312,985 RON in 2024, representing a positive increase of +76.63%. This growth is more significant given that the Salt Bank brand (formerly Idea Bank) was launched in April 2024.

Security is integrated into the bank's technological architecture through robust measures such as the "one-device-one-customer" model, additional passwords for high-value transactions, the exclusion of sensitive information from physical cards, the blocking of screenshots within the app, and additional features such as "Transaction Map" and the display of the actual merchant name for transactions. Salt Bank has set a goal to introduce new features annually that enhance security or address the needs of vulnerable customer groups.

Salt Bank is a strategic project that demonstrates the innovation capacity of the Romanian banking sector. Through proprietary technology, customer-centric solutions, and a rigorous approach to governance and security, the bank is consolidating its position as an emerging digital player, ready to meet the needs of a new generation of banking users and actively contribute to the modernization of the financial market.

Active customers	2025	2024	2025 vs. 2024
Individual Customers	744,051	393,261	+89.20%
Micro Business Customers	3,425	24	+1,417.08%
SME Customers	27	7	+285.71%
Medium-sized Corporate Customers	1	2	-50.00%
Large Corporate Customers	1	2	-50.00%
Total	747,505	393,296	+90.06%

The Salt Bank brand (formerly Idea Bank) was launched in April 2024.

Salt Bank	2025	2024	2025 vs. 2024 (April)
No. of Cards	744,268	389,581	+91.06%
No. of unique users on digital channels	746,030	392,264	+90.12%

BT Leasing

BT Leasing Transilvania IFN S.A. (BT Leasing), part of the BT Group, offers financial leasing solutions for vehicles, equipment, and other assets intended for business development and modernization. The company serves both legal entities and individuals through integrated financing, insurance, and logistics services. In 2025, BT Leasing is strengthening its role in financing the real economy and continuing its digitalization process through the “My BT Leasing” platform, facilitating customer access to documents and day-to-day operations.

In the same context of consolidating its position in the financing market, the value of BT Leasing’s assets increased in 2025 to 6,787,396,074 RON compared to 6,170,333,776 RON in 2024, marking a +9.99% increase, a development that underscores the company’s increasingly important role in financing the real economy.

Active BT Leasing Customers	2025	2024	2025 vs. 2024
Individual customers	532	555	-4.14%
Micro businesses	35,366	31,629	+11.81%
SMEs	8,631	7,792	+10.76%
Medium-sized corporate clients	2,149	1,950	+10.20%
Large corporate clients	122	109	+11.92%
Total	46,800	42,035	+11.34%

BT Asset Management

BT Asset Management S.A.I. (BTAM) is a company specializing in investment management and a member of the BT Group. Management services are provided for open-end investment funds and alternative investment funds, with investments across a wide range of financial instruments (stocks, bonds, government securities, deposits, etc.). Access to the capital market is offered to clients through investments in Romania, Europe, and the U.S., in RON, EUR, and USD.

Active BTAM Customers	2025	2024	2025 vs. 2024
Individual clients	418,651	251,577	+66.41%
Corporate customers	1,789	1,459	+22.61%
Total	420,440	253,036	+65.45%

Through BT Pay, BTAM offers a fully digital channel for the distribution of investment funds, covering the entire operational workflow, from onboarding and electronic document signing to online trading of fund units and real-time portfolio management. This digitization has significantly expanded customer access to BTAM products, directly contributing to increased usage of digital channels.

In 2025, the number of unique users of BTAM's digital channels reached 170,404, compared to 45,656 in 2024, representing a +273.2% increase compared to the previous year. This trend confirms the accelerated adoption of digital investments through BT Pay and its essential role in democratizing access to investment funds within the BT Group.

The value of assets under management (AUM) by BTAM saw significant growth in 2025, increasing organically from 6.08 billion RON in 2024 to 9.03 billion RON in 2025, representing an increase of 48.53% (approximately +2.95 billion RON).

At the management company level, proprietary assets under management rose from 191.16 million RON in 2024 to 312.58 million RON in 2025, corresponding to a 63.52% increase (+121.42 million RON).

The table below lists the investment funds managed by BTAM, all of which are authorized and supervised by the Financial Supervisory Authority (ASF):

2025				2024			
Fund Name	Individual Clients	Corporate Clients PJ	Value of assets under management (RON)	Fund name	Individual Clients	Clients PJ	Value of assets under management (RON)
BT AGRO	1,002	18	15,438,113.46	BT AGRO	927	21	14,645,993.52
BT CLASIC	53,352	176	457,714,390.66	BT CLASIC	30,166	128	271,464,739.32
BT DOLAR FIX	1,829	35	295,328,838.92	BT DOLAR FIX	1,265	22	208,923,129.36
BT ENERGY	2,884	39	76,222,001.11	BT ENERGY	2,980	42	79,301,357.49
BT EURO CLASSIC	4,446	57	233,967,372.86	BT EURO CLASSIC	2,941	40	151,294,178.68
BT EURO FIX	17,599	99	1,802,660,720.96	BT EURO FIX	13,539	71	1,168,497,933.79
BT EURO OBLIGATIUNI	6,480	45	485,263,375.22	BT EURO OBLIGATIUNI	6,008	36	386,234,114.44
BT FIX	179,787	393	1,475,135,115.74	BT FIX	109,565	335	1,117,556,622.11
BT INDEX AUSTRIA ATX	5,364	63	240,331,795.69	BT INDEX AUSTRIA ATX	1,981	31	79,690,689.30
BT INDEX ROMANIA ROTX	64,334	246	1,186,368,744.25	BT INDEX ROMANIA ROTX	26,459	187	485,362,280.65
BT INVEST 1	0	3	683,687,972.21	BT INVEST 1	0	3	477,241,215.48
BT INVEST	14	4	18,074,659.77	BT INVEST	15	4	17,038,849.85

BT MAXIM	26,902	167	739,232,139.57	BT MAXIM	12,862	109	386,203,570.59
BT OBLIGATIUNI	44,343	359	1,032,032,677.77	BT OBLIGATIUNI	37,848	365	884,955,390.70
BT REAL ESTATE	826	18	13,179,035.76	BT REAL ESTATE	829	16	14,218,746.88
BT TECHNOLOGY	9,489	67	274,069,977.47	BT TECHNOLOGY	4,192	46	131,913,609.12
				BTFIAIP PROPERTY*	0	3	204,576,080.60
Total	418,651	1,789	9,028,706,931.42	Total	251,577	1,459	6,079,118,501.88

*As of October 2025, the BTFIAIP Property fund is no longer part of the portfolio managed by BT Asset Management; its management has been taken over by INNO Investments. Therefore, data for 2025 is presented only for the period during which the fund was in the BTAM portfolio, which may affect direct comparability with the information for 2024.

BT Pensii

BT Pensii – Societatea de Administrare a Fondurilor de Pensii Facultative S.A. (BT Pensii) is the administrator of the voluntary pension funds (Pillar III) within the BT Group. The company manages two funds – **Pensia Mea and Pensia Mea Plus**, the latter having been added to the portfolio in 2025 following the ASF's final authorization to take over the management of the BRD Medio fund.

BT Pensii business experienced rapid growth in 2025. The number of participants rose to 213,801, up from 95,839 in 2024, representing a 123% increase. This growth was also reflected in the value of assets under management, which rose to 791.35 million RON, compared to 290.47 million RON in the previous year, representing a 172% increase. The expansion and digitization of operations contributed significantly to these results: the number of unique users of digital channels rose to 151,200 in 2025, compared to 28,457 in 2024, driven by the integration of funds into the BT Pay app.

BT Pensii remains the only voluntary pension administrator with a majority Romanian ownership stake, positioning itself among the market leaders with a consolidated base of over 213,000 participants.

BT Pensii	2025	2024	2025 vs. 2024
No. of participants	213,801	95,839	+123.08%
Value of assets under management (RON)	791,350,710.48	290,469,079.41	+172.43%
No. of unique users on digital channels	151,200	28,457	+431.32%

BRD Pensii

BRD Societate de Administrare a Fondurilor de Pensii Private S.A. (BRD Pensii) is the administrator of the mandatory private pension fund (Pillar II) within the BT Group. The company was acquired at the end of November 2025 by Banca Transilvania and BT Investments, marking the BT Group's entry into the mandatory private pension market (Pillar II). The fund managed by BRD Pensii manages total assets of 9.29 billion RON on behalf of 614,444 participants, of whom 29,924 are unique users of digital channels.

BRD Pensii	2025
No. of participants	614,444
Value of assets under management (RON)	9,293,708,468.29
Number of unique users on digital channels	29,924

Together, these developments reinforce the BT Group's role as a key player in the private pension fund management market, through a business model focused on sustainable growth, digitalization, and responsible management of participants' assets.

BT Capital Partners

BT Capital Partners, the investment banking and capital markets division of the BT Group, offers brokerage services, advisory services for listings, mergers and acquisitions, corporate finance, and strategic research, operating through a network of 10 regional offices nationwide. Digitalization continues to be a strategic pillar for the development of BT Capital Partners.

Digital platforms, particularly BT Trade, have significantly contributed to increasing the accessibility and efficiency of investment services. The number of unique users of digital channels increased by +53.25% in 2025 (43,792 unique users in 2025 compared to 28,575 unique users in 2024).

As of December 31, 2025, the value of assets recorded a significant increase, reaching 1,244,677,670.89 RON, compared to 879,788,581.39 RON in 2024, which corresponds to an annual change of +41.48%. This trend reflects both the favorable market dynamics and investor confidence in the services offered by BT Capital Partners.

Active BTCP Customers	2025	2024	2025 vs. 2024
Individual customers	48,511	34,667	+39.93%
Corporate customers	561	527	+6.45%
Total	49,072	35,194	+39.43%

INNO Investments

INNO Investments S.A.I. S.A., part of the Banca Transilvania Group, is an investment management company with a modern approach focused on responsibility, innovation, and sustainable performance. The company's current form is the result of the BT Group's acquisition of OTP Asset Management Romania in October 2024 and the rebranding completed in June 2025, which consolidated INNO's positioning as a manager of UCITS funds and alternative investment funds (AIFs).

INNO Investments' strategy aims to develop the local alternative investment fund market, with a focus on private equity, venture capital, and thematic or sector specific funds areas that support the development of the local entrepreneurial ecosystem and the financing of companies throughout their growth cycle.

In 2025, the company's client base underwent a reconfiguration compared to the previous year, in the context of strategic transition and post-rebranding repositioning. The number of individual customers reached 4,435, compared to 8,127 in 2024, reflecting primarily the recalibration of the portfolio and the gradual shift toward alternative funds and investors with a more specialized profile.

A similar trend is observed among corporate clients, whose number stood at 74 in 2025, compared to 127 in the previous year. This trend is linked to the realignment of the product offering and the more selective nature of investment strategies associated with alternative funds.

Overall, these developments indicate a controlled and intentional transition of INNO Investments' business model, with the company focusing on consolidating the alternative funds segment and developing an investor base aligned with medium- and long-term strategic objectives, in synergy with Banca Transilvania Group's strategic directions.

Active INNO Investments Clients	2025	2024	2025 vs. 2024
Individual customers	4,435	8,127	-45.4%
Corporate customers	74	127	-41.7%
Total	4,509	8,254	+45.4%

BT Direct

BT Direct IFN S.A. is a non-bank financial institution and a member of the BT Group that offers a wide range of financial products, including in-store credit, online credit, and personal loans, with the goal of becoming Romanians' preferred choice for banking products through quality, modern services and convenient financing solutions offered to customers, by developing sustainable partnerships with major retailers in Romania.

Active BT Direct customers*	2025	2024	2025 vs.2024
Individual customers	230,321	227,057	+1.43%
No. of active cards	145,722	142,305	+2.40%
No. of unique users on digital channels	6,884	9,648	-28.64%
No. of partners	1,455	1,153	+26.19%

* Active customers with transactions in the last 6 months as of December 31, 2025

In 2025, the number of active cards reached 145,722, compared to 142,305 in 2024, representing an increase of 3,417 cards, or +2.4%. The use of digital channels shows mixed results: the number of customers who accessed online services was 6,884 in 2025, compared to 9,648 in 2024, while the number of cards enrolled in BT Pay rose to 58,487 in 2025, surpassing the previous year's level of 54,357, marking an increase of 4,130 cards, equivalent to +7.6%. This indicates a real increase in adoption of the app, even though the gross volumes of online traffic were lower.

In 2025, there were 10 active strategic partners, compared to 7 in 2024. The number of locations associated with these partners increased to 352, compared to 337 in the previous year, marking an increase of 15 locations, or a 4.5% rise. This expansion was driven both by the entry of new partners into the ecosystem and by the strengthening of existing partnerships.

The total number of locations in the local retailers, medical, and automotive categories saw significant growth, reaching 1,988 locations in 2025, compared to 1,582 in 2024, an increase of 406 locations from the previous year, equivalent to +25.7%. The most dynamic segment was the medical sector, where the number of locations increased from 169 to 434, or +265 locations (+156.8%). The automotive segment grew from 345 to 489, representing an increase of 144 locations (+41.7%). The local retailers category remained stable, with 1,065 locations compared to 1,068 in 2024.

Including strategic partners and local merchants, the total number of locations rose to 2,340 in 2025, up from 1,919 in 2024, an increase of 421 locations, representing a 21.9% growth. This expansion confirms the consolidation and diversification of the acceptance network, as well as increased penetration nationwide.

Victoriabank

Victoriabank was the first commercial bank established in the Republic of Moldova on December 26, 1990, and remains one of the key financial institutions in the Moldovan banking system in 2025. The bank continues to grow within the BT Group, of which it has been a part since 2018, strengthening its role in the economy by expanding its product portfolio, modernizing its infrastructure, and aligning with international banking standards.

With over 1,200 employees, more than 360,000 active customers, and 67 branches in 23 localities across the Republic of Moldova, Victoriabank provides financing to approximately 40,000 individuals and companies. Thus, Victoriabank remains a trusted financial institution, dedicated to meeting the needs of its customers and supporting the economic development of the Republic of Moldova.

The institution's financial performance confirms this growth. In 2025, Victoriabank's total assets reached 31,477,916,055 Moldovan RON, compared to 24,618,951,588 RON in 2024, marking a 27.84% increase. The growth in assets underscores the bank's sustainable development and the continued preference of customers and partners for Victoriabank's services.

Through its extensive experience and commitment to innovation, Victoriabank continues to pave the way to success and bring prosperity to people's lives and businesses.

Active customers	2025	2024	2025 vs.2024
Individual Customers	349,451	320,610	+8.99%
SME* Customers	14,258	12,808	+11.32%
Medium-sized corporate customers*	416	381	+9.18%
Total	364,125	333,799	+9.08%

*The adjustment to the number of SME and mid-market corporate customers for 2024 results exclusively from the application of the new segmentation methodology implemented in 2025. In the previously published report, the figures for 2024 were presented according to the segmentation valid at that time (2024), namely 12,841 SME customers and 348 medium-sized corporate customers.

Victoriabank	2025	2024	2025 vs. 2024
No. of units	67	63	+6.34%
No. of ATMs	269	252	+6.74%
No. of POS terminals	10,574	9,064	+16.65%
Cards	635,089	527,501	+20.39%
Merchants in the network	6,061	5,082	+19.26%
No. of unique users on digital channels	363,354	323,227	+12.41%

Microinvest

The business model of OCN Microinvest SRL (Microinvest) focuses on providing non-bank loans to individuals, microenterprises, and small and medium-sized enterprises, with the aim of facilitating access to financing and supporting economic development in the Republic of Moldova. The company offers responsible financial solutions that contribute to improving living standards and strengthening the local entrepreneurial environment.

The year 2025 marked an important milestone in Microinvest's evolution, as the company joined the BT Group through its acquisition by Victoriabank. This transaction strengthened the BT Group's presence in the Moldovan market and expanded its capacity and expertise to support the local entrepreneurial environment through financing solutions tailored to customer needs.

As of December 31, 2025, Microinvest had a total of 49,623 active clients in its portfolio, covering the segments of individuals, medium-sized companies, microenterprises, and small and medium-sized enterprises.

As of the same date, total assets stood at 7,921,409,995 MDL, reflecting the size of the financing portfolio and the scale of operations. The company's territorial network comprised 17 branches nationwide.

At the same time, Microinvest made extensive use of digital channels, with 58,444 unique users at the end of 2025. The network of merchant partners consisted of five main partners, who facilitated customers' access to loan payments through alternative channels.

Active customers	2025
Individual Customers	46,420
Micro businesses	2,880
SME customers	292
Medium-sized corporate clients	31
Large corporate clients	0
Total	49,623

BT Leasing Moldova

BT Leasing Moldova (BT Leasing MD), a member of the BT Group, is consolidating its leading position in the financial leasing market in the Republic of Moldova, ranking first in terms of leasing portfolio size for the ninth consecutive year, according to official statistics.

The company provides financial leasing services to both individuals and the SME and large corporate segments, actively contributing to the development of the entrepreneurial environment and the growth of the local economy's competitiveness by facilitating access to financing for assets intended for business expansion and modernization.

The portfolio includes flexible financing solutions for vehicles, equipment, and machinery, with leasing products tailored to clients' profiles and requirements, offering competitive terms in both the national currency and foreign currency.

BT Leasing MD promotes responsible financing and supports projects related to sustainable mobility, energy efficiency, and the use of technologies with low environmental impact. At the same time, it facilitates the business community's access to dedicated financing sources for projects with improved environmental performance, contributing to the modernization of assets, the reduction of operational costs, and the increased competitiveness of the local economy.

Through operational agility, team expertise, and a constant customer focus, BT Leasing MD operates based on principles of transparency, accountability, and commitment to generating a positive and sustainable impact for all stakeholders.

Unique active customers BT Leasing MD	2025	2024	2025 vs. 2024
Individual Customers	677	740	-8.51%
SME Customers	270	262	+3.05%
Micro businesses	492	439	+12.07%
Medium-sized corporate clients	40	51	-21.57%
Total	1,479	1,492	-0.87%

As of December 31, 2025, BT Leasing Moldova had 1,381 active lease contracts with legal entities, representing an increase of approximately 9.35% compared to December 31, 2024, a trend that reflects the positive development of the business and the consolidation of the corporate client portfolio.

BT Broker

BT Insurance Broker (BT Broker) operates as part of the BT Group, with the role of providing and managing insurance policies associated with the leasing contracts financed by BT Leasing. In 2025, the company continued to manage the portfolio of policies for financed assets throughout the entire term of the leasing contracts, contributing to the continuity and quality of services offered to clients.

In line with the BT Group's strategy, BT Broker continues its transition toward a more diversified operational model, focused on digitalization and integrated services, aligning with market developments and customer needs.

Financially, the value of BT Broker de Asigurare's assets stood at 78,186,200 RON in 2025, compared to 95,314,987 RON in the previous year, indicating a decrease of -17.97%. This trend reflects natural changes in the portfolio structure, in line with operational dynamics and the specific nature of the insurance brokerage business.

Active BT Broker Customers	2025	2024	2025 vs. 2024
Individual customers	846	785	+7.77%
Micro businesses	34,527	29,368	+17.56%
SMEs	8,844	8,518	+ 3.82%
Medium-sized corporate clients	766	733	+ 4.5%
Large corporate customers	2,090	2,097	-0.33%

Improvement Credit Collection

Improvement Credit Collection S.R.L. (ICC), an entity founded in 2013 and part of the BT Group, carries out specialized activities in the management of non-performing portfolios, debt collection through extrajudicial and judicial procedures, as well as due diligence services for non-performing portfolios held for sale. Its activity is based on a multidisciplinary approach, focused on the efficient and compliant recovery of receivables, for the benefit of financial institutions and commercial companies.

In its market, ICC ranks among the Top 10 companies in Romania in this sector (CAEN code 8291 - Activities of collection agencies and credit reporting bureaus) according to official reports from the Ministry of Finance for the year 2024.

ICC	2025	2024	Growth 2025 vs. 2024
Corporate Clients	10	12*	-16.66%
Asset Value (RON)	39,734,011	36,065,328	+10.17%

*As of December 31, 2024, 11 out of 12 were active, as OTP Leasing had migrated prior to the end of the year.

Awards, Recognitions, and Affiliations

The BT Group enjoys strong recognition in the financial and banking industry, both nationally and internationally. In 2025, the BT Group received numerous awards and distinctions for its performance, service innovation, and contribution to the sustainable development of the economy.

Ratings from credit agencies, as well as membership in prestigious organizations, reinforce its position as a trusted leader and strategic partner in support of the business community and local communities.

Rating-uri

In November 2025, **Moody's Ratings** upgraded both Banca Transilvania's long-term deposit rating and its short- and long-term issuer ratings.

The agency upgraded the bank's long-term deposit rating to Baa1 from Baa2, the highest rating, in line with the country's rating. Moody's changed the outlook to negative, similar to Romania's.

At the same time, BT's issuer ratings were upgraded to Baa2 from Baa3, with a stable outlook. This stable outlook on the issuer ratings reflects the rating agency's expectation that Banca Transilvania, due to its financial performance, capital, and profitability, will remain resilient despite macroeconomic challenges.

Moody's confirmation of the baseline rating (Ba1) and other ratings reflects the bank's strong capitalization, ample liquidity, and robust profitability, supported by its leading position in Romania and effective cost optimization.

In December 2025, Fitch Ratings affirmed Banca Transilvania's long-term issuer rating at "BBB-" and the bank's viability rating at "bbb-".

At the same time, Fitch Ratings maintains a negative outlook on the confirmed ratings, in line with the country's rating.

The agency justifies its decision to affirm the ratings with Banca Transilvania's strong and well-established position in the domestic market, solid capital reserves supported by a robust internal capital generation capacity, and a stable funding profile. The ratings also highlight the good asset quality, supported by a sound lending policy.

Credit ratings assigned to Banca Transilvania S.A.:

<u>Moody's</u>		<u>Fitch Rating</u>	
Date	November 2025	Date	December 2025
Outlook for the bank's long-term ratings	Negative	Outlook on the bank's long-term ratings	Negative
Long-term and short-term counterparty risk ratings (CRR)	Baa1/P-2	Long-term IDR	BBB-
Long-term and short-term deposit ratings	Baa1/P-2	Short-term IDR	F3
Core credit assessments	ba1	Sustainability rating	bbb-
Adjusted baseline credit assessments	Ba1	Long-term foreign currency IDR (sovereign risk)	BBB-
Counterparty Risk (CR) Ratings	Baa2(cr)/P-2 (cr)	Long-term IDR in local currency (sovereign risk)	BBB-
Long-term and short-term issuer ratings	Baa2/P-2	Country ceiling (sovereign risk)	BBB+
ESG credit impact score	CIS-2		
Issuer ESG Profile Scores	E-3/S-3/G-2		

In addition to its credit ratings, Banca Transilvania S.A. has obtained the following ESG ratings:

Rating Agency	Score	Date
Sustainalytics	14.9 / low ESG risk	November 2024
Refinitiv	79/100 (A-)	January 2025
FTSE Russell	3.3/5	December 2024
CDP	C	December 2025
Romania Corporate Sustainability and Transparency Index	93/100, Gold Level Recognition	December 2024
ARIR VEKTOR	10/10	January 2025

Sustainalytics

For the third consecutive year, Banca Transilvania received a Low ESG Risk rating from Sustainalytics. BT achieved a score of 14.9, an improvement over the score obtained in 2023 (15.1). This score ranks BT 119th out of 1,040 banks analyzed globally and in the top 11% of both all companies analyzed by Sustainalytics and all evaluated banks. 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.

Refinitiv

Banca Transilvania achieved a very good rating score of 79/100 (A-) in 2024 from Refinitiv, a company within the London Stock Exchange Group. This score ranks Banca Transilvania 71st out of 1,1145 banks evaluated by Refinitiv worldwide. Refinitiv's assessment is based on the three ESG pillars (Environmental, Social, and Governance), with a focus on specific sub-pillars such as: Emissions, Resource Use, Innovation, Human Rights, Product Responsibility, Workforce, Community Management, Shareholders, and CSR Strategy. Banca Transilvania ranked first in most of these categories and subcategories, based on the scores obtained. BT achieved strong scores, exceeding 75 points, in the Corporate Governance (92/100 points) and Environment (78/100 points) categories. A cumulative total rating between 75 and 100 indicates excellent ESG performance and a high degree of transparency in the public reporting of material ESG information.

FTSE Russell

Banca Transilvania received an ESG rating of 3.3 following the FTSE Russell assessment. The ESG index is the result of an assessment based on three pillars: environmental, social, and governance, using over 300 indicators that analyze the bank's exposure and how BT manages the ESG area. The FTSE Russell Group is one of the world's best-known organizations providing indices for global financial markets. It is a company of the London Stock Exchange Group (LSEG) and provides data analytics, ratings, and indices for analysts and investors.

Awards and recognition

Awards and Recognition	Provided by	Details
Best Annual Report 2024	Romanian Investor Relations Association (ARIR)	Banca Transilvania received recognition on multiple levels for its investor relations efforts, as well as from investors themselves, at the ARIR Gala
Best ESG Performance & Communication		
Best IR Event: Investor Day 2024		
Best IR Professional		
Best IR Representative		
Best IR Website		
Best CEO Award: Omer Tetik		
Best CFO Award: George Călinescu		
Best Investor Program Award		
Maximum VEKTOR rating		Maximum VEKTOR rating for BT's 2024 communication with investors and shareholders
Banca Transilvania: The most traded stock on the BVB's regulated market; The issuer with the highest increase in liquidity; The issuer with the best media relations. Financial Press Award.	Bucharest Stock Exchange (BVB)	BVB Awards: Banca Transilvania, BT Asset Management, and BT Capital Partners, the year's top performers on the capital market
BT Asset Management: Best-performing local investment fund: BT Technology		
BT Capital Partners: Most Active Broker in the Bond Segment		
Banca Transilvania – Women's Network	The Azores Sustainability & CSR Services & Allies for Sustainability	Networks & Employee Groups: Culture change from the inside

The biggest supporter of your business (After your Mom) – BT Mic & Sector 7 HUB	Art Directors Club Romania (ADC*RO)	The most creative campaigns of February, as awarded in the TOP ADC*RO February 2025.
TALK vs. ACTION (Less talk, more business) – BT Stup & Sector7 HUB		Creative campaigns, worthy of awards in the TOP ADC*RO March 2025
COMMUNITY INDEX 2025: Mentoring, Leadership, and Non-Formal Education Category and Student Education Category - GOLD RECOGNITION	Community Index (Investing in People and Planet)	What's Next: Banca Transilvania & Save the Children and the Bucharest Municipal Center for Educational Resources and Assistance; Dar Scholarships Project - Hope and Homes for Children, Category: Mentoring, Leadership & Non-Formal Education
Company of the Year in Financial Leasing: BT Leasing	FINMEDIA and Piața Financiară magazine	Awards recognizing the performance of leasing companies for their activities in 2024, as well as special awards marking the 30th anniversary of the first issue of Piața Financiară magazine and the 20th anniversary of the FINLEASING supplement.
Asset Management Company of the Year Romania 2025 - BT Asset Management	Global Banking & Finance Awards	Fund & Asset Management Awards and Investment, Brokerage, & Forex Awards
BT Capital Partners - Best Mobile Trading Platform Romania 2025; Best Research House Romania 2025; Best Securities Brokerage Romania 2025		

As part of BT's diversity, equity, and inclusion (DEI) strategy, at [the RDCC \(Romanian Diversity Chamber of Commerce\) Awards Gala in December 2025](#), BT was honored with the "Women's Network" award in the "Employee Networks and Groups: Cultural Change from Within" category. The award reflects how this initiative goes beyond internal engagement, strategically integrating support for women into the organization's business model. By linking the development of female leadership with dedicated funding and education programs for women entrepreneurs, the "Women's Network" directly contributes to expanding access to capital and growth opportunities. Thus, the cultural change promoted within the bank generates a measurable economic impact in the community and the broader entrepreneurial ecosystem.

Affiliations

Companies within the BT Group are active members of relevant organizations and associations, both nationally and internationally, reflecting a shared commitment to best practices, compliance, and strategic collaboration in the financial and banking sector.

Affiliations 2025	The company holds a position in the leadership structure	Listing 2025
ACI Romania/Association of Financial Markets	Luminița Runcan, President	YES
Romanian Audit Office Association Transmedia	does not hold a management position Member	YES
American Chamber of Commerce in Romania (AMCHAM)	Luminița Runcan, Treasurer	NO
French Chamber of Commerce, Industry, and Agriculture in Romania	does not hold a leadership position Member	YES
Agro Food Ind Napoca Cluster Association	does not hold a leadership position member	YES
Chamber of Commerce for Diversity	does not hold a management position member	NO
Romanian Private Equity Association (ROPEA)	does not hold a management position member	YES
Romanian Electronic Payments Association (APERIO)	Marius Flore, member	YES
HR Management Club Association	Nevenca Doca, member Adina Zbucea, member	Affiliation
Association for Investor Relations on the Romanian Stock Exchange (ARIR)	Ioan Sumandea, Board of Directors	YES
Romanian Banking Association (ARB)	Luminița Runcan, Vice Chair of the Board of Directors	YES
Romanian Factoring Association (AFR)	Ioana Neacșu Member of the ARF Board of Directors	NO
British-Romanian Chamber of Commerce	does not hold a management position Member	YES
Romanian Chamber of Commerce and Industry	does not hold a leadership position member	YES
Romania Green Building Council (RoGBC)	does not hold a leadership position member	YES
Factor Chain International	does not hold a management position member through Victoriabank and BT	Affiliation
C-EDU Education Cluster Association	does not hold a leadership position Member	YES

Affiliations 2025	The company holds a position in the leadership structure	Listing 2025
ASPEN Romania Institute Association	Omer Tetik, Member	Affiliation
UNEP-FI: Principles for Responsible Banking	Does not hold a leadership position Member	YES
The European Money Market Institute	does not hold a management position member	Affiliation
Diversity Charter	does not hold a management position member	Affiliation
Romanian Sustainable Coalition	does not hold a leadership position member	NO
Romanian Brokers Association	does not hold a leadership position member through BT Capital Partners	Affiliation
Association of Leasing and Consumer Credit in Romania (ALCCR)	Liviu Șerban, Vice Chair of the Executive Committee	YES
Association of Banks of Moldova	does not hold a management position member via Victoriabank	YES
Oaklins	Daniela Secară, member	YES
European Business Association (EBA)	Aursulesei Mihai-Mircea, member of the association's board	YES
Association of Business and Management Consultants (ACAMS)	Does not hold a leadership position member through Victoriabank	YES
Association for Private Pension Administration in Romania (APAPR)	does not hold a management position member through BT Pensii and BRD Pensii	Affiliation
Association of Financial Companies in Romania (ALB)	does not hold a management position Member through BT Leasing Member via BT Direct	Membershi p
Association of Fund Managers in Romania (AAF)	Dan Dascăl, Member of the AAF Board of Directors	Affiliation
Romanian Microfinance Association	Alexandru Valentina, Member of the Board of Directors	Affiliation
Association of Romanian Investors in Moldova (AIR)	holds a leadership position Marius Crăciunaș, member of the Coordinating Council	YES
European Microfinance Network (EMN)	does not hold a leadership position Member of BT Mic	Affiliation
Commercial Debt Management Association (AMCC)	does not hold a leadership position	Affiliation

Affiliations 2025	The company holds a position in the leadership structure	Listing 2025
	Member of ICC	
American Chamber of Commerce in Moldova	does not hold a leadership position Member through Victoriabank	YES
Chartered Institute of Personnel and Development (CIPD)	does not hold a leadership position member via Victoriabank	YES
Information Systems Audit and Control Association (ISACA)	does not hold a management position member via Victoriabank	YES
Certified Information Systems Auditor (CISA)	does not hold a management position Member via Victoriabank	YES
Association of Chartered Certified Accountants (ACCA)	does not hold a management position member via Victoriabank	YES
The National Association of Exporters and Importers of Romania (ANEIR)	does not hold a leadership position Member	YES
Association of Legal Advisors in the Banking and Financial System	Mihai Rotaru, President	YES
National Institute of Internal Control in Romania (INCIR)	does not hold a management position member	YES
European League for Economic Cooperation, ELEC Romania	does not hold a leadership position member	YES
Hungarian Business Association in Romania	does not hold a leadership position member	YES

General Strategy and Sustainability Goals

Banca Transilvania's sustainability strategy reflects the alignment between global sustainable development priorities and local economic realities in Romania. This approach provides a clear framework for understanding how BT's business model and activities contribute to the transition toward a more sustainable and inclusive economy. Since its inception, the Bank has focused on supporting the Romanian business sector and its access to financing, with financial inclusion and SME development as central elements of its strategy, embedding sustainability principles into its DNA before the concept was formalized.

Long-term sustainable and inclusive growth requires a balance between environmental responsibility, social progress, and economic stability. Thus, the sustainability strategy is built on three main pillars, Performance, People, and Environment, setting clear, measurable goals to support the achievement of these commitments.

- **Performance** – promoting equitable access to financial services, integrating sustainability criteria into financing decisions, supporting clients' climate transition, and expanding green and sustainable financing;
- **People** – investing in employee development, well-being, and inclusion; supporting customers in the decarbonization process; and contributing to the sustainable development of local communities;
- **Environment** – reducing the environmental impact of BT's operations through energy efficiency, emission reduction, and responsible use of resources.

The strategic sustainable development objectives aim to integrate sustainability into the business model through specific policies and measures, in line with Banca Transilvania's values. Additionally, a clear monitoring framework is established through key performance indicators (KPIs) and alignment with international standards. It is essential to promote a responsible organizational culture, supported by training, ethics, and diversity programs. The Bank maintains an active dialogue with stakeholders (i.e. investors, customers, and partners) to adapt the ESG strategy to their expectations, while ensuring transparency and regulatory compliance.

The implementation of the strategy is overseen by the ESG Committee, which approves and monitors the measures adopted, ensuring their reporting to management and the proper archiving of documentation.

Our sustainability goals

Pillar: **PERFORMANCE**

Our product and service objectives are essential for integrating sustainability into our core activities:

- **5 billion RON:** The initial target for the issuance of green loans to companies, validated according to the CAFI methodology, was set at 5 billion RON for the 2025–2027 period, reflecting the target set for 2025. Subsequently, given the better-than-expected developments recorded during the 2024–2025 period, the target was revised and increased to 6.5 billion RON for the 2025–2028 period. Details regarding the progress made are presented in Chapter 3.3 Sustainable Financing.
- **Minimum 30%:** The proportion of electric and hybrid vehicles in the leasing portfolio. Deadline: Annually, starting in 2024. Details on progress made are presented in Chapter 3.3. Sustainable Financing.
- **Minimum 85%:** The percentage of digital customers out of the total customer base, to encourage the use of digital channels. Deadline: Annual. By 2025, over 98% of Banca Transilvania's customers will be digital, as a result of initiatives to provide customers with the easiest possible experience, anywhere and anytime. As outlined above, BT Group subsidiaries continue to accelerate the adoption of digital channels among customers, with significant progress also in 2025.
- **Minimum 20%:** Green mortgage loans as a percentage of total annual mortgage loan volume. Deadline: Annual. Green mortgages accounted for 19.5% of the mortgages granted by Banca Transilvania in 2025, compared to 13.2% in 2024, meaning that approximately 1 in 5 newly granted mortgages falls into the green category (compared to approximately 1 in 8 in the previous year). Further details regarding the progress made are presented in Chapter 3.3. Sustainable Financing.

The sustainability strategy is adopted and tailored by the BT Group's subsidiaries, which, as of December 31, 2025, are at various stages of developing a framework for monitoring, measuring, and reporting on sustainability objectives. Depending on the maturity level of these frameworks, their progress is presented in the Sustainability Statement in the relevant sections, including Chapter 3.3. Sustainable Finance.

Pillar: **PEOPLE**

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

- **Minimum 50%:** Employee participation rate in eNPS. Deadline: Annual.
- **Minimum 40 hours:** Average number of training hours per BT GROUP employee.
- Reducing the gender pay gap within the company. Deadline: Annual.

These objectives were achieved in 2025, and details regarding the progress made in 2025 are presented in Chapter 3.1 BT Group Team.

Pillar: **ENVIRONMENT**

We aim to reduce the environmental impact of our operations by:

- **Minimum 85%:** The proportion of renewable energy in the total energy consumption of BT GROUP companies. Deadline: Annual. Details regarding progress are presented in Chapter 2.2 Climate Change.
- Reducing emissions generated by our own operations (Scope 1, Scope 2, and relevant Scope 3 categories, excluding financed emissions), monitored by emissions intensity (tCO₂/million RON). As of the reporting date, a quantitative target had not been established; it will be defined at a later stage, in accordance with the requirements of the ESRS MDR. Details regarding progress are presented in Chapter 2.2 Climate Change.

Assessment of Current Products, Services, and Markets

The Group's products and services were assessed against sustainability objectives, highlighting priorities such as:

- Sustainable financial products (green loans, green mortgages, leasing solutions for clean transportation, etc.) that help reduce environmental impact.
- Target markets include both companies and individuals, with a focus on segments with high potential for adopting sustainable solutions (e.g., high-emission economic sectors or customers interested in low-emission mobility solutions or energy-efficient housing).

Additional information regarding the Group's approach to sustainable finance, the types of products offered, and financing volumes is presented in Chapter 3.3 Sustainable Finance.

Strategic Elements and Key Challenges

Initiatives to support sustainability goals:

- Developing a climate transition plan to reduce direct, indirect, and financed emissions, based on climate scenario analysis and decarbonization targets.
- Continuing education and awareness programs for customers and employees, focused on green finance, energy efficiency, and climate risk management.
- Increasing collaboration with strategic partners (international financial institutions, local authorities, business associations, NGOs) to promote sustainability.

Key Challenges

- Challenges arising from the geopolitical climate and their repercussions on the macroeconomic context at the local and European levels.
- Adapting to a changing regulatory landscape requires flexibility and the updating of internal processes.
- Integrating sustainability principles into the business model without compromising economic efficiency.
- Balancing the diverse requirements of stakeholders (authorities, investors, employees, communities) to align with sustainability goals.

Critical resources for our operations

- The bank's **financial performance** and solid capitalization lay the groundwork for future growth of the BT Group's impact in the markets where it operates.
- **Territorial network of branches and agencies:** Direct connection with customers, providing a deep understanding of their priorities, challenges, and preferences, including sustainability-related issues.
- **Technological infrastructure:** Digitization of processes and services for operational efficiency, reducing environmental impact, and expanding access to financing and financial products.
- **Human capital:** Employees who are vital to our success, with a focus on professional development and best practices in organizational culture.
- **Relationships with suppliers and partners:** Collaborators who share our values of responsibility and legal compliance.

Value generated

- **Customers:** Financial products that meet their demand for projects and purchases with low environmental impact (green mortgages for individuals, leasing for the purchase of electric and hybrid vehicles, financing that supports projects with low environmental impact, etc).
- **Distribution channels:** Digital solutions for access to financing.

- **Investors:** Transparency and solid performance, alignment with international sustainability standards.
- **Communities:** Educational initiatives, care for the communities where we operate, responsible financing, strategic partnerships.

Position in the value chain

- **Upstream value chain:** Management of resources and relationships with depositors and providers of services and capital to support operational infrastructure and mobilize capital toward a more sustainable economy.
- **Downstream value chain:** Strategic partner for retail (individual customers), non-retail (micro-enterprises, SMEs, large corporations), and additional segments (leasing, asset management, pension funds, brokerage, consulting).

Our central position in the value chain allows us to connect economic actors, facilitating the transition to a sustainable economy and addressing current economic challenges.

DR SBM-2 – Interests and views of stakeholders

For the BT Group, stakeholders are individuals or groups of individuals whose interests are affected or could be affected by the organization's activities.

Stakeholder category	Engagement method	Frequency of engagement	How we communicate	How consultation results are taken into account for all stakeholders
BT Group Employee	BT Employee Experience Index (BT EEI) Various internal contests Employee Net Promoter Score (eNPS)	Permanent	Intranet Sustainability Report	Developing and updating policies that support work-life balance, increasing training opportunities, and improving the digital work infrastructure.
Customers - Individuals and Legal Entities	Net Promoter Score (NPS) Întrebă BT Platform Meetings Conferences "Contact" section on the BT website	Ongoing As needed	Social media channels The BT Talks podcast BT Talks BT Blog Email Newsletter Sustainability Report	Introducing new features to banking apps, streamlining lending processes, and providing educational tools for financial management. Educational events in the field of sustainable finance.

Shareholder	Meetings Conferences Access to information published on the BT website	Quarterly and upon request	Annual General Meeting Video conferences available on the BT website Roadshows and presentations Periodic reports and financial results Newsletter Management Report Ad hoc news Dedicated page on the BT website Sustainability report	Alignment with new sustainability reporting standards, increased transparency, and detailed presentation of financial performance information during quarterly meetings (video conferences).
Government agency/Regulatory authority	Various consultations Meetings	Occasionally and upon request	Financial reports Sustainability report Email	Integrating regulations into the Bank's sustainability policy and supporting public initiatives regarding the transition to a greener and more inclusive economy.
Financial institution	Meetings Various consultations	Occasional	Financial reports Sustainability Report Email	Participation in joint initiatives and implementation of funding schemes with European support. Collaboration with international institutions to attract funds for projects supporting the transition to a green economy.
Investor/Analyst	Various consultations Meetings	Annual Occasionally Quarterly	Webcasts available on the BT website Roadshows and presentations Periodic reports and financial results Financial Newsletter Directors' Report Sustainability report Dedicated website	Publishing detailed reports on financial and sustainability performance, organizing and participating in dedicated events (e.g., Investors Days), and expanding sustainability commitments across the product portfolio.
Supplier	Meetings	Occasionally	Sustainability report Email	Increasing transparency in business relationships, reducing emissions in the supply chain, and supporting suppliers in adopting sustainable practices.
Business Partner	Meetings	Occasional	Sustainability Report Email	Developing sustainable partnerships and improving transparency in commercial relations.

Non-governmental organizations	Projects developed in partnership	Occasionally	Sustainability Report Email	Implementation of financial education programs and funding of projects that support local development.
Relevant associations	Meetings	Occasional	Sustainability report Financial reports Email	Supporting the adoption of common sustainability standards in the financial sector, promoting financial education and inclusion.

Investor Relations

Annual tele/video conferences with investors are organized in accordance with the financial calendar published on the Bucharest Stock Exchange website at the beginning of each calendar year. The following table presents the dates of these conferences, as well as the topic of each one:

Annual video conferences organized by BT	Date	Event
2024 Financial Results, Video Conference	04.03.2025	Online
Q1 2025 Financial Results, Conference Call	20.05.2025	Online
H1 2025 Financial Results, Conference Call	27.08.2025	Online
Q3 2025 Financial Results, Conference Call	11.11.2025	Online

During these conference calls, in addition to information regarding the BT Group's financial and business performance, ESG-related topics, updates, and key progress are presented. The dialogue during these meetings facilitates access for shareholders, investors, analysts, and international financial institutions to ask questions of the BT Group's executive management regarding various sustainability issues, the level of integration of ESG factors into the Group's operations, or the sustainable development strategy for the future.

Net Promoter Score – NPS

The Bank prioritizes customer satisfaction, measured by NPS and HI (human interaction). In 2025, the NPS was 86.25, up by nearly 4 points from 2024, and the HI was 98.65, at a level similar to that of 2024. The indicators were calculated based on responses from nearly 80,000 customers. The NPS calculated based on customers who conduct transactions in-branch is at a historic high, and human interactions are rated positively by nearly 99% of customers. Over 85% of customers who interact with branch staff report that they received information on how to conduct transactions without visiting a branch and save time and money. The feedback process converted 50% of detractors into promoters and 85% of passives into promoters.

Integrating stakeholder interests into the strategy and business model

The BT Group's strategy and business model progressively integrate sustainability considerations into its main development directions, including the digitization of financial services, supporting the transition to a low-carbon economy, and reducing environmental impact. In this context, the Group aims to meet the expectations of its main stakeholder groups by adapting its activities, products, and internal processes to economic, social, and environmental developments.

Stakeholders' interests and perspectives are taken into account in the Group's strategic processes, including the process of identifying and assessing sustainability impacts, risks, and opportunities. These contributions are integrated into the Group-wide DMA and support the definition of strategic directions and priorities for action in the area of sustainability.

For customers, the Group aims to improve the accessibility and efficiency of financial services through the digitization of processes and the development of innovative solutions such as mobile apps and online banking services. At the same time, the product portfolio is gradually being expanded to include financing instruments that support projects with a positive environmental impact and the transition to more sustainable economic practices.

Employees are a key element in implementing the Group's strategy. To this end, initiatives are underway to support professional development and promote a fair and inclusive work environment. Training programs cover relevant topics in sustainability and ESG, and measures aimed at increasing employee engagement and reducing pay gaps are integrated into the Group's human resources policies.

Regarding environmental impact, the Group aims to reduce greenhouse gas emissions and increase the use of renewable energy in its own operations. The Group is currently developing a climate transition plan, in line with the commitments made as part of its collaboration with the European Bank for Reconstruction and Development (EBRD). The initiatives implemented to date reflect the Group's strategic direction regarding managing its environmental impact and supporting the transition to a more sustainable economy.

Integrating these objectives into the business model helps strengthen dialogue with investors, authorities, and other stakeholders, as well as increase transparency regarding the economic, social, and environmental impacts of the BT Group's activities.

At the same time, collecting and reporting sustainability information can pose challenges for certain categories of customers, particularly in the context of expanding ESG reporting requirements. To support the process of adapting to these requirements, the Bank has launched dedicated information and education programs, including conferences and thematic events for customers.

Stakeholder interests and perceptions are integrated into the Group's governance processes. Members of the Board of Directors and the Leaders' Committee are regularly

informed about stakeholders' key concerns regarding the organization's sustainability impacts. This information is collected through structured processes and communicated through various mechanisms, including periodic reports, strategic meetings, the work of the ESG Committee, and direct dialogue with stakeholders.

A detailed overview of the main stakeholder categories and the methods used to consult them is included in the table in section [DR SBM-2 – Interests and views of stakeholders](#).

[DR SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model](#)

As part of the update to the 2025 double materiality analysis (DMA), the impacts identified in the 2024 assessment, relating to our own operations and the supply chain, underwent a structured reassessment. The process was conducted in collaboration with the ESG Working Group and relevant representatives of entities within the BT Group and incorporated both feedback collected through the internal eNPS survey administered to employees and the conclusions of a benchmarking exercise conducted among similar financial institutions in Romania. Following this process, the impacts were reconfirmed in terms of numerical consistency, relevance to the Group's activities, and the level of materiality assigned to each.

For the downstream component, pertaining to the loan portfolio, the impact analysis was conducted using the UNEP-FI methodology, applied to the relevant portfolio filtered according to the 10%, 8%, and 5% thresholds at the sector, subsector, and sub-subsector levels.

In 2025, there were no significant changes in the Group's own operations that would require a full repeat of the DMA. During the reporting period, the Group did not carry out any major mergers or acquisitions that would lead to the introduction of new activities, entry into new markets, or substantial changes to operations. The integration of OTP Bank Romania into Banca Transilvania, which began in August 2024 and was completed on February 28, 2025, through the merger of the two banks, was taken into account in the previously conducted DMA and did not generate new elements requiring a complete reassessment in 2025. Similarly, Microinvest's entry into the BT Group in the microfinance services sector or the completion of the acquisition of the Pillar II pension fund management company did not generate new elements requiring a reassessment, given that the BT Group already managed microfinance activities (BT Mic) and the administration of private pension funds (BT Pensii). Furthermore, there were no significant relevant changes in the structure of the company's main suppliers or in the supply chain. At the same time, the BT Group was not affected by global events with severe impacts on human rights (e.g., military conflicts) and did not enter into new business s with the potential to generate such impacts. Furthermore,

there were no entries into entirely new markets, launches, or closures of significant business lines.

New material impacts, risks, and opportunities identified during the reassessment process

Following the update of the DMA, the Group revised the set of material topics included in the sustainability report. Certain issues relevant to banking, such as financial crime and cybersecurity, were presented in the previous year's sustainability report under other topics or thematic sections.

Based on the updated results of the DMA, developments in the regulatory and market context, as well as a comparative analysis conducted in relation to the practices of other financial institutions, the Group concluded that these topics are of significant relevance to the business model and the risk profile specific to banking activities.

Consequently, in this sustainability statement, these aspects are addressed separately as entity-specific topics, in accordance with the provisions of ESRS 1 regarding entity-specific disclosures, to more clearly reflect the associated impacts, risks, and opportunities and how they are managed at the Group level.

Thus, the analysis highlighted relevant potential vulnerabilities associated with cybersecurity and the prevention of financial crime, with implications for both our own operations and our client portfolio. Internal deficiencies or those of critical suppliers, including providers of IT, cloud, or digital solutions, can lead to operational disruptions, financial losses, penalties resulting from regulatory requirements, and damage to the trust of customers and authorities. At the same time, the misuse of financial products and services for illegal purposes, such as money laundering, fraud, or the financing of other illicit activities, can have negative impacts on society and the real economy and may expose the Group to significant reputational and operational risks.



No new forms of impact or opportunities have been identified.

The complete list of material impacts, risks, and opportunities for BT GROUP is described below.

List of material impacts, risks, and opportunities

Topic/Subtopic/Sub-subtopic	Description of material impact	Impact Type	Where the impact occurs	Time Horizon	How it affects/could affect people or the environment	Derived from the strategy and business model
E1: Climate change adaptation	Financing climate change adaptation projects	 Positive  Potential	 Downstream	Short Medium Long	Helps protect communities from the immediate risks of extreme events, supports job creation in sustainable sectors, and improves quality of life by developing resilient communities in the long term. Supports the conservation and restoration of ecosystems, reduces the impact on biodiversity and natural resources, and contributes to environmental stabilization through sustainable climate change adaptation measures.	Yes, the company has goals to increase the share of green financing
E1: Climate Change Mitigation	Measures implemented to reduce the carbon footprint in BTFG's own operations and supply chain, such as the use of renewable energy and the modernization of heating, ventilation, and air conditioning (HVAC) systems for energy efficiency.	 Positive  Current	 Upstream  Own operations	Environment	Contributes to reducing environmental pressure by limiting greenhouse gas emissions and supports efforts to mitigate climate change. In the medium and long term, positive effects may be reflected in improved environmental quality, reduced climate risks, and the protection of human health and well-being.	Yes, the company has targets to limit and reduce Scope 1 and 2 GHG emissions and, consequently, to reduce energy consumption from conventional sources.
E1: Climate Change Mitigation	Financing of the following sub-sectors: mixed farming, wholesale trade in agricultural machinery, equipment, and supplies, pig farming, cultivation of cereals (excluding rice), legumes, and oilseeds, purchase and sale of own real estate, development of construction projects, meat processing and preservation, sale of passenger cars and light motor vehicles, retail sale of automotive fuels in specialized stores, and provision of products in the form of mortgage/real estate loans.	 Negative  Current	 Downstream	Medium Long	While funding these activities supports economic development and the diversification of agricultural and industrial sectors, it can have a negative impact on local communities and consumers by increasing air pollution and harming public health. High greenhouse gas emissions exacerbate climate change, increasing the frequency of extreme events that affect people's safety and well-being. The financed activities contribute to increased greenhouse gas emissions through the use of agricultural machinery, transportation, production processes, and building heating, accelerating global warming. This leads to ecosystem degradation, biodiversity loss, and the destabilization of natural cycles, with long-term effects on the ecological balance.	Yes, the company has loans in its portfolio granted to companies operating in these sectors.
E1: Climate Change Mitigation	Scope 2 and Scope 3 greenhouse gas (GHG) emissions, as well as air pollution generated by the Bank's direct activities. The consumption of electricity and heat, and the use of vehicles for transportation, contribute to the carbon footprint and air pollution, negatively affecting the quality of the environment	 Negative  Current	 Upstream  Own operations	Long	Greenhouse gas emissions and air pollution generated by the Group's activities can affect the health of local communities by increasing the incidence of respiratory and cardiovascular diseases. In addition, contributing to climate change can amplify risks related to extreme weather events, indirectly affecting safety and quality of life.	Yes, the company generates emissions at the operational level and within the supply chain (through its business model).

E1: Energy	Financing renewable energy projects	 Positive  Potential	 Downstream	All time horizons	Contributes to broader access to clean and sustainable energy sources, reducing dependence on fossil fuels and lowering long-term energy costs. It also creates jobs in innovative sectors and improves quality of life by reducing air pollution. Investments in renewable energy reduce greenhouse gas emissions, helping to combat climate change. These projects protect ecosystems by mitigating the negative impact of conventional energy sources and promote the sustainable use of natural resources.	Yes, the company has financing in its portfolio for renewable energy projects
E1: Energy	Financing energy-intensive sectors, such as the refractory products manufacturing sub-sector	 Negative  Current	 Downstream	All time horizons	Funding for these sectors contributes to increased greenhouse gas emissions and air pollution, affecting the health of communities by raising the risk of respiratory and cardiovascular diseases. Furthermore, the economic costs resulting from the impact of climate change can affect the financial stability of households and communities. The activities of energy-intensive sectors contribute to an increased carbon footprint, accelerating climate change and environmental degradation. High consumption of non-renewable resources and the generation of industrial waste affect ecosystems, reduce biodiversity, and destabilize the environment's natural cycles in the long term.	Yes, the company has financing in its portfolio targeting energy-intensive sectors
E1: Energy	The use of non-renewable energy sources and the lack of measures to reduce energy consumption in its own operations, including in data centers, lighting, and office equipment.	 Negative  Current	 Own operations	Short Medium	Increased operational costs and, indirectly, higher prices for consumers. Additionally, pollution generated by the production and consumption of these energy sources can affect the health of local communities by increasing levels of air pollutants. Dependence on non-renewable energy sources intensifies greenhouse gas emissions and contributes to the depletion of natural resources. This amplifies climate change, damaging ecosystems and affecting biodiversity, while the lack of measures to reduce energy consumption accelerates environmental degradation.	Yes, the company's business model involves energy consumption (headquarters, branches, fleet).
S1: Secure employment	Creating secure and attractive jobs, supported by diversity and competitive wages, ensuring a decent standard of living for employees and supporting the economic stability of local communities.	 Positive  Potential	 Own operations	Short	Creating secure, well-paid jobs improves employees' quality of life, providing them with a decent standard of living and opportunities for professional development. Diversity and inclusion in the workplace promote social cohesion, and the resulting economic stability supports the prosperity of local communities.	Yes, through human resources policies
S1: Collective bargaining, including the proportion of workers covered by collective	Positive impact on employees: BT GROUP has a collective bargaining agreement that establishes working conditions, rights, and obligations.	 Positive  Current	 Own operations	Short Long	Collective bargaining and the existence of a collective bargaining agreement ensure fair working conditions and clear rights for employees, promoting a healthy and stable relationship between employers and employees. This contributes to increased job satisfaction and reduced labor disputes,	Yes, through human resources policies

bargaining agreements					supporting the well-being and economic stability of employees in the short and long term.	
S1: Health and Safety	Ensuring access to necessary medical services by offering a benefits package that provides stability and security regarding staff health. This contributes to long-term well-being, which employees experience in the present.	 Positive  Current	 Own operations	In short	Offering a benefits package that includes access to necessary medical services supports staff health and well-being, reducing stress related to potential medical costs. This measure promotes employee stability and security, contributing to increased productivity and job satisfaction.	Yes, through human resources policies
S1: Gender equality and equal pay for work of equal value	Wage gaps and unequal opportunities among employees based on gender can lead to discrimination and dissatisfaction among staff.	 Negative  Current	 Own operations	Short Long	May negatively affect employee well-being and motivation, fueling perceptions of unfairness and discrimination. In the medium and long term, such situations can lead to a decline in trust in the organization, internal tensions, and difficulties in attracting and retaining staff.	Yes, through human resources policies
S1: Training and skills development	Through training and career development programs, BTFG contributes to improving employees' skills and professional advancement.	 Positive  Current	 Own operations	Short Medium	Training and professional development programs enhance employees' skills, boost their confidence in their abilities, and provide opportunities for career advancement. These initiatives contribute to job satisfaction and staff retention, supporting personal and professional development in the short and medium term.	Yes, through human resources policies
S1: Employment and Inclusion of People with Disabilities	Creating an inclusive work environment for people with disabilities.	 Positive  Current	 Own operations	Short Environment	Creating an inclusive work environment for people with disabilities promotes equal opportunities, reduces discrimination, and fosters social integration. This helps improve the quality of life for these individuals by providing them with economic stability and opportunities for personal and professional development.	Yes, through human resources policies
S1: Measures against violence and harassment in the workplace	A work environment that promotes non-discrimination and appropriate behavior in the workplace, with beneficial effects on the organizational climate and on employees' well-being and mental health.	 Positive  Current	 Own operations	Short Long	Implementing measures against workplace violence and harassment creates a safe and respectful environment that promotes employee well-being, mental health, and satisfaction. Such measures help reduce stress, increase productivity, and build trust between employees and employers in the short and long term.	Yes, through human resources policies
S1: Diversity	Promoting diversity among employees, including cultural, gender, or ethnic diversity, can enhance innovation and collaboration within the team, thereby improving the overall well-being of employees.	 Positive  Current	 Own operations	Short Long	Promoting diversity among employees creates an inclusive environment that encourages respect, collaboration, and the exchange of ideas. Cultural, gender, or ethnic diversity stimulates innovation and helps create a healthy work atmosphere, which improves employee well-being and satisfaction in the short and long term.	Yes, through human resources policies
S1: Confidentiality	Violations of employees' privacy rights can negatively affect employee satisfaction and trust.	 Negative  Potential	 Own operations	Short	May undermine employee trust and their sense of safety at work, affecting their satisfaction and relationship with the organization. In the medium and long term, negative effects on the internal climate and staff retention may arise.	Yes, through human resources, data protection, and cybersecurity policies

S4: Confidentiality (Impact of information on consumers and/or end users)	Irresponsible and unethical management of customer data, given the large volume of information collected daily. Improper data management can compromise confidentiality and have a negative impact on customers and society at large, especially in cases involving PII (Personally Identifiable Information).	 Negative  Potential	► Own operations	Short	Improper management of customer data, particularly personal information, can lead to a loss of trust and financial harm for those affected.	Yes, through data protection and cybersecurity policies
S4: Access to quality information (Impact of information on consumers and/or end users)	Access to quality information significantly contributes to increased customer satisfaction and facilitates informed decisions.	 Positive  Current	► Own operations	Short Long	Providing access to quality information helps customers make informed decisions, increasing their trust and satisfaction. This contributes to improving their overall experience and supports their (economic) well-being in the short and long term.	Yes, from the strategy that prioritizes transparency and customer education/information .
S4: Access to products and services (Social inclusion of consumers and/or end users)	Facilitating access to financing and promoting financial inclusion for all community members, thereby supporting a functional and equitable economy. Through increased accessibility to financial products and services, individuals have greater opportunities to improve their financial situation, while also contributing to the community's economic development.	 Positive  Potential	► Own operations	All time horizons	Facilitating access to finance and promoting financial inclusion provides individuals with opportunities to improve their financial situation and actively participate in the economy. This supports personal well-being and reduces social inequalities.	Yes, from the BT GROUP strategy, which prioritizes social inclusion and financial accessibility for all community members.
S4: Access to products and services	Supporting economic activity and facilitating access to a diverse range of financial products, including consumer, mortgage, and auto loans, savings accounts, and investment products. These instruments contribute to the growth and diversification of economic opportunities, promoting social inclusion and supporting the financial well-being of individuals and local communities. Through improved access to financing, consumers can benefit from more efficient resource management, active participation in the local economy, and an improved quality of life. Furthermore, supporting initiatives for sustainable food and transportation can have positive effects on food security and community mobility.	 Positive  Potential	● Downstream	All time horizons	Contributes to improving the financial well-being of individuals and communities by increasing access to financial resources and economic opportunities. In the medium and long term, it can support social inclusion, the reduction of inequalities, the financial stability of the population, and the sustainable economic development of local communities.	Yes, from the BT GROUP strategy, which prioritizes social inclusion and financial accessibility for all community members.

	Facilitating savings and prudent financial behavior thus contributes to long-term financial stability, the reduction of inequalities, and sustainable economic development.					
Sustainable financing (a specific BT GROUP theme)	Promoting financial products that meet clients' needs, integrating not only financial factors but also criteria related to the environment, social responsibility, and governance into the client's operations.	 Positive  Current	 Upstream	Short Long	Promoting sustainable financial products helps customers achieve their financial goals while integrating social responsibility. This contributes to equitable economic development and improved living conditions for communities.	Yes, as part of BT GROUP's policies and strategy, which include objectives related to increasing the share of sustainable financing.
Entrepreneurship education and financial education (BT GROUP-specific theme)	The impact is achieved by supporting entrepreneurs, startups, and small businesses in developing entrepreneurial and financial skills and knowledge. This support includes assistance provided throughout the financing process (in areas such as financial literacy and business management), facilitating access to specialists, and implementing professional training initiatives.	 Positive  Potential	 Own operations	Short Medium	Supporting entrepreneurs, small businesses, and individual customers through financial education helps develop the skills needed to manage personal and business finances. This contributes to greater economic stability, providing greater opportunities for professional and personal development for individuals and communities.	Yes, through BT GROUP's policies and strategy, which include objectives related to financial education.
G1: Corporate Culture	The impact can be generated by reinforcing the positive values of BTFG's corporate culture, which will build trust among employees, consumers, and society.	 Positive  Current	 Own operations	Short	Strengthening the positive values of corporate culture helps employees create an ethical, transparent, and collaborative work environment. This builds trust among clients and consumers by providing tangible support for their financial needs and fostering relationships based on respect and integrity.	Yes, from BT GROUP's policies and strategy, which prioritize promoting a corporate culture based on transparency, ethics, and responsibility toward customers and society.
G1: Whistleblower Protection	When employees feel safe to report irregularities without fear of retaliation, a compliant work environment is created, where inappropriate behavior is corrected promptly. This system prevents fraud, abuse, and corruption, protecting BT GROUP's reputation and maintaining the trust of the public and customers.	 Positive  Current	 Own Operations	Short Long	Creating a safe environment for reporting misconduct supports employees by giving them confidence that their concerns will be taken seriously and without retaliation. This helps improve employee morale, increase trust in the organization, and foster an ethical work environment.	Yes, from BT GROUP's policies and strategy, which prioritize transparency, ethics, and regulatory compliance, thereby protecting employees, customers, and the external environment.
G1: Prevention and detection, including training	Training and education activities on anti-corruption principles and aspects, as well as bribery prevention, can positively contribute to preventing cases of corruption. This has a beneficial impact on all stakeholders with whom	 Positive  Potential	 Own operations	Short	Training activities on corruption and bribery prevention help employees understand and apply ethical principles in their work, contributing to a work environment based on integrity and respect. Preventing corruption within the organization helps increase public trust in the financial system and the private sector. This supports a fairer business environment, reduces	Yes, from BT GROUP's policies and strategy, which prioritize ethics training and corruption prevention to support a transparent and trustworthy business environment.

BTFG personnel interact, improving the business environment and trust in the financial system in general.

inequalities, and promotes regulatory compliance, which contributes to the overall well-being of society.

Theme/ Subtheme/ Sub-subtheme	Description of material risk	Magnitude of financial impacts	Time Horizon	Source of the risk
E1: Climate change adaptation	★ Portfolio: Financing sectors such as agriculture, forestry, fishing, manufacturing, construction, wholesale and retail trade, motor vehicle repair, transportation, and warehousing exposes BT to risks associated with climate change. Rising temperatures, desertification, drought, floods, and extreme weather events can disrupt the operational activities of financed companies, affecting crop yields, forest health, fish populations, and the integrity of infrastructure. In addition, the risk of wildfires, exacerbated by climate change, could result in significant losses for BT through the destruction of assets and damage to the bank's reputation if it is perceived as supporting practices that do not meet sustainability standards. ■ Upstream and ► Own Operations: BT faces operational and regulatory risks in the context of climate change. Extreme weather events, such as floods or storms, can disrupt daily operations and cause damage to the Bank's physical infrastructure. Furthermore, increasingly stringent environmental regulations may lead to higher operating costs. These risks may affect business continuity and negatively impact BT's reputation if the Bank is not perceived as complying with sustainability and climate responsibility standards.	High	Short Medium	In the portfolio: from the financing the Group provides (impact) Upstream and own operations: from business relationships and potential legislative changes.
E1: Climate change mitigation	★ Portfolio: Financing sectors such as manufacturing, construction, transportation and warehousing, as well as real estate transactions, exposes BT to risks associated with climate change mitigation. Risks include exposure to litigation related to violations of environmental regulations or contributions to greenhouse gas emissions, which may lead to lawsuits and penalties, affecting the reputation and finances of the companies involved. Furthermore, the transition to low-emission vehicle fleets and a low-carbon economy presents significant challenges. Reliance on fossil-fuel vehicles, the costs of complying with stricter environmental regulations, and the need to finance green technologies and projects may negatively impact efforts to reduce emissions and align with international climate goals. In addition, BT faces the risk of climate change-related litigation, which could have significant financial consequences and affect the Bank's reputation and stakeholders' investment decisions.	High	Medium Long	In the portfolio: from the financing the Group provides (impact) or potential legislative changes.
E1: Energy	★ Portfolio: Within the financial and banking sector, the high energy consumption of the companies financed represents a significant environmental risk for BT in the context of climate change. Low energy efficiency and reliance on high-carbon energy sources can increase the environmental footprint of financed companies and undermine climate change mitigation initiatives. This situation may generate pressure at the Group level (impact on the ability to reduce greenhouse gas emissions associated with the portfolio).	High	Medium Long	In the portfolio: from the financing provided by the Group (impact).
E5: Waste	★ Portfolio: Inefficient waste management in sectors financed by BT, including agriculture, forestry, fishing, manufacturing, construction, wholesale and retail trade, motor vehicle repair, transportation and storage, financial intermediation, insurance, and real estate transactions, poses a significant environmental risk. Risks include the improper handling and disposal of chemicals, fuels, oils, filters, batteries, and used tires, as well as the management of construction and demolition waste. These practices can lead to environmental	Medium	Short Medium	In the portfolio: of the financing provided by the Group (impact).

contamination, resource depletion, and increased greenhouse gas emissions.

For BT, these forms of indirect impact generate risks that may result in additional compliance costs, financial losses associated with penalties and remediation, as well as potential reputational damage if the Bank is perceived as supporting unsustainable practices.

In addition, there may be direct financial risks, such as the inability of financed companies to repay loans due to high waste management costs or penalties for non-compliance with environmental regulations.

S1: Training and skills development	■ Upstream and ► Own operations: Inadequate training and education processes can leave employees without the essential skills and knowledge needed to effectively fulfill their roles, leading to decreased productivity and stifled innovation, ultimately affecting the company's financial performance. This issue is particularly critical given the skills required for successful digitalization.	High	Short Medium	In own operations: from the business model and negative impact.
S4: Confidentiality	■ Upstream and ► Own operations: Data privacy and cybersecurity risks can pose major challenges for BT. Data breaches can lead to the compromise of customers' personal information, affecting their trust and financial security. Cyberattacks can disrupt banking operations, with the potential to damage the Bank's reputation and financial stability.	High	Short	In own operations: from the business model and negative impact.
Cybersecurity (BT GROUP-specific topic)	■ Upstream and ► Own operations: The topic is material in upstream and own operations because the security of IT infrastructure and data depends on internal systems, protection, detection, and response processes, as well as critical suppliers (IT, cloud, software, processors). Internal or third-party vulnerabilities can lead to cyberattacks, data breaches, operational disruptions, financial losses, and damage to the trust of customers and authorities. ★ Portfolio: The issue is relevant downstream because a compromise of BT's system security could affect customers' access to financial services, expose personal or financial data, and lead to fraud with a direct impact on users. In addition, customers rely on BT to protect digital transactions, and cyber breaches can lead to financial losses and damage to the group's reputation.	High	All time horizons	In-house operations: from internal policies and processes and legislative regulations. In the portfolio: from the potential negative impact on customers.
Combating financial crime (BT GROUP-specific topic)	■ Upstream and ► Own operations: The topic is material in upstream and own operations because the effectiveness of internal KYC, AML/CFT, screening, and transaction monitoring processes depends on both internal policies, systems, and competencies, as well as critical providers (IT, fintech, operational services). Internal or third-party deficiencies may facilitate illegal transactions and may result in sanctions, financial losses, and reputational impact for the group.	High	All time horizons	In our own operations: from internal policies and processes and legislative regulations.
Combating financial crime (specific BT GROUP topic)	★ Portfolio: This issue is material downstream because financial products and services can be misused for money laundering, fraud, or other illegal activities. The use of the portfolio for criminal purposes can have negative impacts on society and the real economy and may expose the group to sanctions, operational risks, and a loss of public trust.			Within the portfolio: from potential sanctions associated with clients' activities.
Topic/Subtopic/Sub-subtopic	Description of material opportunity		Magnitude of financial effects	Time horizon
E1: Climate change adaptation	★ Portfolio: BT has the opportunity to become a leader in sustainability by financing projects that strengthen climate resilience, encourage environmentally friendly agricultural practices, and facilitate the adoption of low-carbon technologies across various sectors, including the automotive, construction, and manufacturing industries. This includes investments in electric vehicle infrastructure, sustainable construction methods, and improving supply chain efficiency. By offering tailored financial solutions for these initiatives, BT can strengthen its market leadership and help advance a more sustainable economy. ■ Upstream and ► Own Operations: Proactively adapting to climate change presents an opportunity for BT to capitalize on the transition to a low-carbon economy. Implementing	High		Medium Long

adaptation strategies, such as investing in resilient infrastructure, diversifying energy sources, and developing new products and services, can lead to cost savings, innovation, and a competitive advantage in a market increasingly focused on sustainability.

E1: Climate Change Mitigation	★ Portfolio: Amid efforts to reduce greenhouse gas emissions and rising demand for energy-efficient vehicles, there is an opportunity for BT to support the automotive industry in producing hybrid and zero-emission vehicles. Entities that limit the use of critical materials and develop alternatives can mitigate supply disruptions and price volatility, which can have a positive impact on their margins and cost of capital. In addition, promoting energy efficiency and conservation among consumers presents an opportunity to reduce greenhouse gas emissions and save costs for both consumers and utility providers. Strategies such as rebates for energy-efficient appliances, home insulation, and investments in technologies like smart meters can reduce peak demand and lower operating costs for utilities, while also delivering savings for consumers. BT can play a key role in financing these initiatives, contributing to the transition toward a greener economy.	High	Medium Long
E1: Energy	★ Portfolio: BT has the opportunity to drive sustainable transformation across various sectors by offering financial services that promote the green economy. The bank can support the automotive industry's transition to electric vehicles and finance low-carbon clean energy projects, leveraging regulatory stability and long-term financial agreements. BT's role includes financing energy storage solutions and energy efficiency improvements in buildings, collaborating with the Romanian government on programs such as "Prima Casă." Prioritizing investments in renewable energy companies and modernizing energy infrastructure are essential for reducing emissions and conserving water. Financing advanced technologies in energy generation, storage, and distribution offers opportunities for growth and innovation. Competitive mortgage options for energy-efficient homes and the facilitation of Energy Performance Certificates contribute to regulatory compliance and improve property valuations. Financing the expansion and modernization of transmission and distribution networks is essential for energy security and accommodating new energy capacity. By financing high-energy-efficiency properties, BT can reduce environmental and social risks, ensuring the resilience of its mortgage portfolio in a market increasingly focused on sustainability.	High	Medium Long
E5: Resource inputs. Including resource use	Consumer preference for eco-friendly and sustainable products, along with the need for efficient resource and supply chain management, presents an opportunity for BT to finance innovations in the circular economy. Supporting companies that develop low-toxicity products, improve transparency in supply chains, and adopt sustainable practices can help increase market share, reduce regulatory risks, and strengthen brand reputation. These initiatives can open new markets for BT and provide competitive advantages, while contributing to the transition toward a greener and more responsible economy.	Environment	Medium Long
S1: Adequate wages	▶ Own operations: Offering attractive compensation packages by BT can represent a competitive advantage in the industry, strengthening the Bank's ability to attract and retain top talent. This can contribute to improving the Bank's reputation and a positive market perception, having a beneficial impact on the Bank's financial performance.	Medium	Short Medium
S1: Work-Life Balance	▶ Own operations: Supporting a healthy work-life balance can help BT cultivate a work environment that promotes employees' mental health, resulting in increased productivity and an improved reputation as an employer, which can contribute to the Bank's overall financial performance.	Medium	Short Environment
S1: Health and Safety	▶ Own operations: Focusing on employee health and safety through preventive health and wellness programs can transform BT into an inclusive workplace where well-being is a priority. This can lead to reduced absenteeism, increased productivity, greater employee loyalty, and a reputation as a responsible and attractive employer.	Average	Short Medium
S1: Gender equality and equal pay for work of equal value	▶ Own operations: BT's commitment to the Diversity Charter represents a firm promise to promote diversity and equal opportunities within its workforce. This commitment underscores the Bank's dedication to creating an inclusive work environment that recognizes and values the diversity of its employees' backgrounds and experiences.	Average	Medium Long
S1: Training and Skills Development	▶ Own operations: Facilitating a training and career development pathway for employees can significantly contribute to attracting and retaining talent.	High	Short Medium

S4: Access to products and services	► Own operations: The emergence of new financing models and technologies presents an opportunity for BT to expand its range of products and services to previously underserved market segments, thereby opening up new sources of revenue. Offering loans and financial services tailored to the needs of low-income populations and small businesses, in a responsible manner, can contribute to long-term value creation and strengthen the Bank's reputation.	Medium	All time horizons time horizons
Sustainable finance (BT GROUP-specific theme)	The opportunity to diversify the portfolio through green products, such as green loans and sustainable bonds, which meet the growing demand for investments with positive social and environmental impact. This attracts both responsible investors and sustainability-conscious clients, strengthening the Bank's reputation and supporting the transition to a low-carbon economy.	High	Medium
G1: Corporate Culture	► Own operations: Adopting an innovative culture that encourages digitization and digital transformation can improve BT's operational efficiency and attract a younger, tech-savvy customer base. In addition, integrating sustainability principles into the corporate culture and engaging in environmental and social responsibility projects can strengthen BT's reputation among ethically and environmentally conscious customers, providing a distinct competitive advantage.	Medium	Short Medium

1.4 Impacts, Risks, and Opportunities

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities

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

The reassessment of impacts, risks, and opportunities as part of the 2025 update of the double materiality analysis was conducted through a structured, phased process, built upon the results of the previous assessment and adapted to reflect any developments in the Group's activities and context.

1. The first step of the process consisted of reviewing the impacts, risks, and opportunities identified in the previous analysis, with the aim of assessing whether, during 2025, new elements had emerged that required their supplementation or adjustment. This review was conducted by analyzing relevant internal documents, used to understand any updates to the Group's policies, commitments, governance framework, and strategic directions, as well as by examining existing reports on ESG performance, risks associated with the main sectors financed, customer satisfaction, and complaint management.
2. In a second stage, a comparative analysis was conducted at the sector level through a benchmarking exercise that included seven banking institutions operating in the Romanian market. The purpose of this approach was to assess the consistency of material topics reported at the financial sector level and to verify the alignment of the Group's analysis results with the current practices of comparable institutions, taking into account the specificities of the local market and the applicable regulatory framework.
3. A third step in the process involved analyzing the results and existing mechanisms for stakeholder engagement, with a focus on the perceptions and expectations of employees and customers. To this end, the results of the Employee Net Promoter Score (eNPS) survey were utilized, which provides relevant information on employee satisfaction, organizational climate, and perceptions of internal governance, as well as the results of the Net Promoter Score (NPS) survey, administered to retail and corporate clients, to assess overall experience, the quality of products and services, and the level of trust in the institution.
4. In addition, the Group engaged with users of sustainability information through multiple external dialogue channels. With regard to ESG investors and analysts, the Group participated in consultation sessions during which sustainability reports and allocation and impact reports were analyzed. The discussions involved experts in investor relations and ESG integration and focused on the quality, consistency, and completeness of the reported information. The feedback received confirmed the Group's alignment with ESRS best practices, the EU Taxonomy, and the PCAF

methodology, as well as its prudent approach to defining material topics, while also recommending the continued annual publication of the DMA methodology and the inclusion of comparative information across reporting periods.

The Group also maintained an ongoing technical dialogue with international financial institution partners, such as the IFC, focused on integrating ESG risks into lending processes and on the level of transparency and granularity of sustainability reporting. These interactions supported the process of engaging information users, contributing to the external validation of material topics, both from the perspective of impacts and financial risks.

At the same time, the involvement of internal stakeholders played a central role in the analysis process, through consultation with relevant internal experts within the Group. Representatives from human resources, legal, finance, risk, procurement, and business lines were involved, coming together within the Group's ESG Working Group. This group includes members from the green and sustainable lending, data analytics and BI, ESG risk analysis and sustainable finance, ESG integration and investor relations, human resources, reporting, sustainable corporate governance and capital markets, treasury, risk management, and data science departments. At the same time, each subsidiary of the Group has designated a person responsible for sustainability issues, who collaborates regularly with the bank's working group to align initiatives and coordinate activities. The early and ongoing involvement of these experts was essential for identifying, validating, and reassessing impacts, risks, and opportunities, as well as for validating the results of the DMA at every stage of the process.

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

The assessment and prioritization methodology remained unchanged from the previous year, as the analysis conducted for the double materiality update which included "peer analysis," assessment of the internal and external context, evaluation of existing internal mechanisms and stakeholder engagement processes, as well as the analysis of the results obtained, did not identify any new triggers or additional forms of impact. Thus:

- In the assessment process, impacts were analyzed based on severity and likelihood of occurrence, taking into account different time horizons, namely short-, medium-, and long-term. Severity was determined based on the magnitude, scope, and remediable or irreparable nature of the impacts, in accordance with the requirements of ESRS 1 AR 10. Magnitude reflected the severity of negative impacts or the level of benefits generated by positive impacts on people or the environment, while scope indicated the extent of these impacts. Irreversibility was analyzed exclusively for negative impacts and considered the extent to which their effects could be remedied.
- Probability was assessed only for potential impacts and indicated the likelihood of their occurrence. The time horizons considered were those specified by ESRS 1. For

potential negative impacts related to human rights, severity took precedence over probability, such that impacts reaching a certain level of severity were considered regardless of the estimated probability of occurrence.

- To assess the materiality of the impacts, a scale from 0 to 5 was used, with the materiality threshold set at 2.5. This threshold was chosen in line with the practices recommended in the EFRAG Implementation Guidance on Double Materiality Analysis, with the aim of identifying as significant only those impacts with the potential to substantially affect stakeholders and/or the environment. Impacts assessed below the 2.5 threshold were classified as informational or minimal and were not considered relevant for decision-making or reporting.

Updates on the use of the UNEP FI Portfolio Impact Analysis Tool for assessing the impact of the loan portfolio

For the downstream component related to the loan portfolio, the impact analysis was conducted using the UNEP FI Portfolio Impact Analysis Tool methodology, applied to the relevant portfolio filtered according to the 10%, 8%, and 5% thresholds, at the sector, subsector, and sub-subsector levels, in line with the approach described in the dedicated methodological section. The assessment considered the structure of the 2025 loan portfolio and aimed to identify the impacts associated with the economic activities financed by the Group.

Given that the 2025 loan portfolio is classified using NACE Rev. 3 codes, while the UNEP FI methodology and the sectoral impact map are based on ISIC classifications mapped to NACE Rev. 2, a two-step mapping procedure was applied to ensure methodological consistency. In the first stage, the NACE Rev. 3 codes for economic sectors, subsectors, and sub-subsectors were converted into equivalent NACE Rev. 2 codes using [the official equivalence tables published by Eurostat](#). Subsequently, the resulting NACE Rev. 2 codes were correlated with the corresponding ISIC classifications, in accordance with the requirements of the UNEP FI methodology.

The results of the analysis confirmed the continuity of the loan portfolio's impact profile. A comparison of the identified impacts with the analysis conducted in 2024 showed that, given the continued financing of the same relevant economic sectors, the financing activities in 2025 did not generate new impacts at the portfolio level.

Identification, assessment, prioritization, and monitoring of risks and opportunities

Following the reassessment process, two new risks were identified, derived from a more granular analysis of the Group's dependence on critical internal processes and essential third-party suppliers, as well as from a clearer correlation between the source of risks and the areas of the value chain where they may manifest. The reassessment aimed, while maintaining the previous methodological framework, to better reflect the specific nature of each Group entity's activities, the logic of internal risk management methodologies, and

the interdependencies between its own operations, upstream operations, and the portfolio, so that relevant risks are documented explicitly and comparably in the analysis tool.

The first risk concerns cybersecurity and data protection and stems from the fact that this issue arises simultaneously in multiple areas of the value chain, with different but interconnected potential effects. In upstream and proprietary operations, reliance on internal systems, protection, detection, and response processes, as well as on critical suppliers in the IT, cloud, software, and processing sectors, creates a risk profile that cannot be reduced to a single control point. Internal or third-party vulnerabilities can lead to cyberattacks, data breaches, and operational disruptions, with financial and reputational consequences. In the portfolio area, the same type of incident can affect customers' access to financial services, expose customers' personal or financial data, and result in fraud with a direct impact on users.

The second newly identified risk is associated with KYC, AML/CFT, screening, and transaction monitoring processes and stems from a reassessment of how the effectiveness of these processes depends not only on internal policies, systems, and capabilities but also on critical third-party providers, including IT solutions, fintech, and operational services. In its own operations and upstream, internal or third-party deficiencies may facilitate illegal transactions and result in sanctions, financial losses, and reputational consequences for BT GROUP. Within the portfolio, financial products and services may be misused for money laundering, fraud, or other illegal activities, and this may have negative effects on society and the real economy, while also exposing the Group to operational risks and a loss of public trust.

The methodology for assessing risks and opportunities has not changed since 2024. These were analyzed based on the potential magnitude of the financial effects and the probability of occurrence. The magnitude of the financial effect was assessed using a scale from 0 to 3, where 0 indicates no impact, and 3 indicates a critical impact on BTFG's financial performance or operations. This scale, simplified to highlight the most relevant potential financial effects, is correlated with BTFG's internal risk scale, which ranges from 0 to 5.

Probability of occurrence was assessed on a scale from 0 to 5, allowing for a more detailed assessment of the degree to which a risk or opportunity is likely to materialize. The financial materiality threshold was set at 1.5, with the aim of identifying risks and opportunities with at least a significant impact on the organization, while filtering out items with minimal financial impact.

The Bank did not prioritize sustainability-related risks over other risk categories; these are assessed within the same general risk management framework.

Assessment of the magnitude of the impact of risks associated with the portfolio

The magnitude of ESG risks associated with the portfolio was assessed by analysing the exposure of the loan portfolio to climate-related risks (physical and transition),

energy-related risks, risks associated with waste management, and transition risks, using climate and economic indicators integrated into the internal application for the identification and assessment of climate and transition risk. The assessment was performed in correlation with the clients' ESG risk profiles and included a sensitivity analysis of probabilities of default, with the aim of estimating the magnitude and potential impact of these risks on repayment capacity.

As part of the analysis, transition risks associated with the financed activities were considered, determined based on the relevant NACE code, namely CO₂ emissions risk, technological risk, legislative risk, market risk and reputational risk. These risks may generate financial pressure on clients in the context of the transition towards a sustainable economy, with a potential impact on economic performance and probability of default.

In addition, physical climate risks were analysed using relevant climate indicators such as average annual temperature, precipitation, wind speed and seismic risk, complemented by additional indicators introduced in the assessment process (heat stress, temperature variability, water stress, drought, heavy precipitation, storms, tornadoes and fluvial flood risk). The analysis of these indicators allows for the estimation of the potential impact on financed activities and on the value of collateral, including in scenarios where insurance coverage is in place.

In assessing magnitude, the Bank used absolute values, frequencies, intensities and specific indices calculated at county level for the period 2019–2023, based on data from ANM, Ro-Adapt, WRI Aqueduct and the European Severe Weather Database.

Assessment of the probability of risks associated with the portfolio

Probability was determined based on:

- the frequency and intensity of climate phenomena identified in historical data and climate forecasts;
- legislative and economic developments regarding the transition to sustainable practices;
- the macroeconomic context and anticipated pressures on the financed economic sectors.

Given the acceleration of the climate transition across the entire economy, the probability associated with transition risks was considered high or frequent.

Risks associated with governance and social issues

For these themes, the magnitude of the impact was assessed based on the potential direct financial consequences for the bank, such as:

- significant fines

- additional operational losses
- remediation and compliance costs
- damage to customer trust and the institution's reputation.

The probability associated with these risks was determined based on incident history, but is considered dynamic, requiring continuous monitoring, given the increased exposure generated by digitalization, large volumes of data, and interdependence with external service providers.

Controls Implemented

To update the double materiality analysis, BT Group maintained a clear working process to ensure the consistency of the assessment and the soundness of the conclusions. Coordination of the analysis was the responsibility of the ESG&IR department, which monitored the progress of the stages, reviewed the results, and incorporated feedback received along the way.

The reassessment process was carried out with the support of a working group comprising specialists from relevant departments, such as Human Resources, Legal, Finance, Procurement, Risk, Investor Relations, and Business Lines. Their involvement contributed to the validation of the information used and to an assessment grounded in the current activities of the bank and its subsidiaries.

The progress of the analysis and preliminary results were periodically presented to the ESG Committee, where they were discussed and adjusted as necessary. The resulting material topics were approved by the ESG Committee and subsequently presented to the Audit Committee, which performed the final validation.

Changes from the Previous Reporting Period

Compared to the previous reporting period, the methodology used for the double materiality analysis was maintained to ensure consistency of results and comparability over time.

The reassessment process aimed to update available information and conduct a more detailed analysis of the company's own operations, without significant changes to the assessment methodology. In this context, two additional risks were identified, related to cybersecurity and processes to prevent the misuse of financial services (KYC and AML/CFT).

These developments led to the inclusion of two new specific material topics: Cybersecurity and Combating Financial Crime. Overall, however, these additions reflect a more mature analysis of exposures and trends relevant to the banking sector rather than a change in the methodological framework.

2. Environmental Information

2.1 EU Taxonomy

For the year ended December 31, 2025, the Group reports Taxonomy information in accordance with Annex V, Annex VI, and Annex XI of Commission Delegated Regulation (EU) 73/2026.

The comparative information included in the Taxonomy reporting section has been prepared in accordance with Annex V, Annex VI, and Annex XI of Commission Delegated Regulation (EU) 2021/2178 under Taxonomy Regulation 2020/852. The key performance indicators (KPIs) for prior periods were previously prepared in accordance with the reporting requirements of the Delegated Act applicable before the amendments introduced by the Omnibus Delegated Act.

The Group decided not to recalculate the KPIs published in 2025 using the rules applicable from January 1, 2026, in accordance with the provisions of Question 4 of the draft Commission Notice issued on 17 December 2025.

The approach adopted by the Group is based on the use of information available in internal systems, publicly disclosed data reported by counterparties, and information collected through internal ESG assessment processes. In applying the methodology, the Group aimed to ensure the consistency, traceability and verifiability of the reported indicators, adopting a prudent approach in situations where the information required to confirm alignment is not available or does not allow for an appropriate assessment.

1. Regulatory framework on the EU Taxonomy

1.1 Overview of the framework

The European Union (EU) Taxonomy is a classification system for environmentally sustainable economic activities, designed to direct capital flows towards activities that contribute to the transition to a sustainable economy. Regulation (EU) 2020/852 ("the Taxonomy Regulation") establishes the framework for classifying environmentally sustainable economic activities by defining six environmental objectives.

The technical screening criteria for these objectives are set out in the EU Taxonomy delegated acts, namely:

- Delegated Regulation (EU) 2021/2139
- Delegated Regulation (EU) 2022/1214 amending Delegated Regulation (EU) 2021/2139
- Delegated Regulation (EU) 2023/2486

- Commission Notice C/2025/1373

For financial institutions, the framework introduces the Green Assets Ratio (GAR), an indicator expressing the proportion of Taxonomy-aligned assets in total relevant exposures. The disclosure of the GAR and of other indicators required by Article 8 is governed by Delegated Regulation (EU) 2021/2178, subsequently amended by Regulation (EU) 2023/2486.

For the assessment of the sustainability of an economic activity, the EU Taxonomy is based on two fundamental concepts: eligibility and alignment.

Eligibility represents a preliminary filter indicating whether an economic activity is included in the list of activities defined by the Taxonomy and, therefore, may potentially contribute to one or more environmental objectives.

Alignment reflects the extent to which an eligible activity fully meets the criteria established by the regulation. To be considered Taxonomy aligned, an activity must:

- contribute substantially to at least one of the environmental objectives;
- do no significant harm to the other environmental objectives (Do No Significant Harm – DNSH);
- comply with minimum social and governance safeguards (Minimum Safeguards – MSS).

1.2 Significant legislative changes

At the beginning of 2026, the European Commission introduced a package of simplifications through Delegated Regulation (EU) 2026/73, which amends the reporting requirements under Regulation (EU) 2020/852 and the related delegated acts regarding the methodology and format for reporting eligibility and alignment indicators.

These amendments are accompanied by a set of technical clarifications (FAQs) regarding the application of the Article 8 disclosure requirements, as updated by the Omnibus Delegated Act.

The main changes introduced:

- Materiality threshold: specific-use assets below 10% of the total may be excluded from detailed assessment and reported separately.
- Simplified templates: the reporting structure is reduced and integrated; the tables for fossil gas and nuclear energy are removed.
- Expanded scope: from 2026, alignment indicators are reported for all six environmental objectives, not only for climate.
- Transition period: for 2025, the previous reporting format may be used.

1.3 Changes in presentation and reporting

During the current reporting period, the Group has performed the following changes:

1. The Group does not report Template 6 Fees and Commission KPI from DDA 2178/2021 by making use of the provisions of the DDA 73/2026, paragraph (7).
2. The Group reports for current year figures under the new amended regulation DDA 73/2026 Annex V, Annex VI and Annex XI.
3. In accordance with Article 8(3) of the Disclosures Delegated Act, reporting undertakings should provide comparative data. The Group does not recalculate comparative KPIs for the period ended December 31, 2024, under the new amended Omnibus Delegated Act and continues to report Annex V, Annex VI and Annex XI information as in the Delegated Regulations (EU) 2021/2178 applicable at the year end mentioned. The decision of the Group is based on the provisions offered by question 4 from the Draft Commission Notice from the 17th of December 2025.
4. The Group reassessed its total environmentally sustainable assets, including Main KPI Stock****, Main KPI Stock***** (Template 0), as well as households - loans collateralised by residential immovable property (Template 1 and 3). This reassessment is based on improvements made to internal data extraction processes, previously reported as contextual information in accordance with Annex XI to Delegated Act 2021/2178. The Group implemented an integrated data extraction process through Optical Character Recognition (OCR) and expanded the EPC information database, including certificates for loans originated prior to 2020, which had not been captured in the previous reporting cycle. For more information, please see sections 3 and 4 below.

2. Scope of reporting

Information regarding the EU Taxonomy is prepared at the Group level, based on the prudential consolidation perimeter applicable to credit institutions as of December 31, 2025. The reporting applies the requirements provided for financial institutions under Regulation (EU) No. 575/2013 on prudential requirements for credit institutions (CRR) and Commission Implementing Regulation (EU) 2021/451 (FINREP).

The taxonomy indicators are calculated based on data reported in FINREP prudential reports.

3. Methodology for calculating GAR indicators

The methodology used to determine the eligibility and alignment of exposures is structured according to two main categories:

- exposures to undertakings (financial institutions and non-financial undertakings)
- exposures to households – mortgage loans.

For exposures to undertakings, a distinction is made between:

- exposures with Known Use of Proceeds (KUoP)
- exposures with Unknown Use of Proceeds (UUoP).

3.1 Undertakings with Known Use of Proceeds (KUoP)

The identification of the KUoP exposures analysed was based on two criteria: the purpose of the financing (investments) and the type of green loan flag. The Group considered this flag as an additional criteria because there are working capital loans with a green designation for which the use of proceeds is known. Green loans granted to undertakings are defined and monitored based on the Bank's "Guidelines for Green Loan Granting," presented in the chapter dedicated to green financing within the Statement. These exposures include loans for project financing as defined in Annex V, Part 2.89 of the CRR, Article 147(8).

For these projects, verification of the technical criteria for substantial contribution was performed using internal assessment and analysis tools.

For exposures determined as eligible, the following steps were followed for the purpose of the alignment analysis:

Exposures were considered eligible for the alignment analysis only if:

1. The relevant criteria were determined for the purpose of assessing substantial contribution in accordance with Delegated Act 2021/2139, including through the identification of green financing granted for renewable energy projects
2. The selection included only exposures assessed as having an ESG risk level of at most medium, following an ESG risk analysis performed using a detailed questionnaire covering aspects relevant to the DNSH criteria and Minimum Safeguards.

Thus, for the purpose of compliance with DNSH and Minimum Safeguards, the Group documents a dedicated internal model, applied on an individual basis, in accordance with Delegated Regulation (EU) 2021/2139, including the references in Appendix A relating to the assessment of physical climate risks.

The internal model documents the assessment of the impact on other environmental objectives, the analysis of project resilience to relevant physical climate risks, as well as compliance with social and governance standards. The analysis is carried out by the ESG Risk Analysis Department, in accordance with the Corporate Lending Policy and the internal ESG analysis workflow applicable at the Group level.

3.2 Undertakings with unknown use of proceeds (UUoP)

In the case of UUoP exposures, the eligibility and alignment analysis is based on information published by counterparties regarding their Taxonomy indicators.

The Group collects and analyzes information from the sustainability reports of counterparties in the portfolio that fall within the scope of the NFRD (entities with more than 500 employees):

- Share of EU Taxonomy eligible/aligned activities;
- Indicators calculated based on Turnover and capital expenditures (CapEx)
- Breakdown by environmental objectives, where the information is available

The collected percentages are applied to UUoP exposures to determine the eligible and aligned amount, both for the outstanding exposure as of December 31, 2025 (stock) and for exposures granted during 2025 (flow). The results are aggregated in accordance with the structure of Annex VI to Delegated Regulation (EU) 2026/73.

In the absence of information published by counterparties regarding Taxonomy indicators, exposures are treated as non-eligible and non-aligned.

3.3 Households - mortgage loans

For the retail portfolio, the eligibility and alignment analysis was performed for residential mortgage loans associated with economic activity 7.7 "Acquisition and ownership of buildings." The alignment of loans for building renovation and motor vehicle loans could not be assessed due to the lack of information necessary for the DNSH assessment of these financings.

For determining the alignment of exposures to households, the methodology differentiates between two categories of buildings:

- Buildings constructed after 2020: the technical criteria is met if the property complies with NZEB (Nearly Zero-Energy Building) requirements, in accordance with national legislation.
- Buildings constructed in or before 2020: the technical criteria requires the existence of an Energy Performance Certificate (EPC) valid at the reporting date, evidencing classification in energy class A or A+. Mortgage loans without a valid EPC or with a lower energy class are not considered eligible.

As part of the assessment of the DNSH principle regarding climate change adaptation, the main physical climate risks relevant for the financed residential real estate assets were analyzed, namely: water-related risks (flooding and rising water levels), wind-related risks, landslides, risks related to extreme temperatures, and wildfires.

The assessment of physical climate risks is carried out by identifying the relevant hazards and analyzing asset exposure, based on the geographical location of the properties and its correlation with climate hazard maps used in internal climate risk analysis tools and external databases. The analysis is carried out in accordance with Appendix A of Annex I to Delegated Regulation (EU) 2021/2139 and covers relevant acute and chronic physical climate hazards.

Specifically, in situations where the financed properties are located in counties characterized by very high level of risk, as determined in accordance with the Group's methodology, water-related risks or other climate risks assessed at the aggregate level, the financings are considered, as a prudent approach, non-aligned from the perspective of the EU Taxonomy, even where the technical eligibility criteria for residential mortgage granted to households is met.

In accordance with the clarifications published by the European Commission regarding the application of the Taxonomy, the assessment of MSS is not applicable in the case of financings granted to households.

In 2025, the Bank optimized the mechanisms for identifying and extracting data from EPCs using automated OCR tools integrated into the collateral management workflow. The process includes automated controls: verification of the energy auditor's serial number, the certificate number, and validation of the minimum mandatory information. Starting from 2025, the OCR process runs automatically, including an initial upload of historical documents.

As a result of improvements to the collection and structuring of data on the energy performance of buildings, the Bank reanalyzed its existing mortgage loan portfolio as of 31 December 2024. Following this reassessment, the volume of mortgage loans identified as aligned with the EU Taxonomy as of 31 December 2024, is approximately four times higher than the value reported in the Sustainability Statement for the previous financial year.

This development primarily reflects the improvement in the data collection process and the availability of information on the energy performance of financed properties, and does not indicate changes in the methodological criteria used to determine EU Taxonomy eligibility and alignment.

For the reporting year 2025, the volume of mortgage loans aligned with the EU Taxonomy remains at a level comparable to that resulting from the recalculation of the 2024 portfolio.

The process for determining eligibility and alignment for loans granted to households remains unchanged compared to the methodology previously described in the report, including with regard to the criteria on building energy performance and the assessment of the DNSH principle.

4. EU Taxonomy Indicators

In accordance with the structure set out in Annex VI of Delegated Regulation (EU) 2026/73, taxonomy indicators for credit institutions are presented using two distinct calculation bases:

- indicators calculated based on the proportion of eligible and aligned activities in counterparties' turnover.

- indicators calculated based on the proportion of eligible and aligned activities in counterparties' capital expenditure (CapEx).

The indicators presented for 2025 should be interpreted taking into account certain elements that may affect comparability with the reporting for 2024.

First, the amendments introduced by Delegated Regulation (EU) 2026/73, including the use of the simplified form provided in Annex VI, result in differences in the structure of the indicators and in the scope of the exposures included in the reporting.

Second, the scope of consolidation perimeter used for the 2025 reporting differs from that used in the previous year, as a result of changes in the Group's structure.

Disclosures in accordance with Annex XI

During the current year, the Group has made improvements related to the data extraction and processing for EU Taxonomy reporting purposes. The Group implemented an integrated data extraction process using OCR technology and expanded the database of energy performance certificates to include certificates related to loans granted prior to 2020, which had not been captured in the previous reporting cycle (see section 3.3.)

The Group identified exposures originated prior to December 2020 for which energy performance certificates are available, resulting in an additional amount of approximately RON 953 million, representing 37% of the difference between the value reported at the end of the 2024 financial year and the reassessed amount for eligible exposures to households collateralised by residential immovable properties.

The remaining difference, of approximately RON 1,698 million, consists of the value reported in the previous period, of approximately RON 633 million, as well as an additional exposure of approximately RON 996 million, for which the Group obtained EPC related information during 2025, either through customers submitting such certificates at the Bank's branches or through the reading of information via the improved OCR process.

This reassessment affects several comparative disclosures and indicators related to EU Taxonomy reporting, namely Template 0, Template 1, and Template 3, as presented below. In this context, the Group considers it appropriate to present restated comparative values for the financial year ended 31 December 2024.

Template 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation as of 31 December 2025.

		Total exposure to Taxonomy-aligned activities (currency)		KPI (1) (%)	KPI (2) (%)	% coverage (over total assets) (3) (%)	Non-assessed exposures (% of covered assets) (4) (%)	Non-assessed exposures (% of covered assets) (4) (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	Turnover-based
Main KPI	Green asset ratio (GAR) stock	4,543.56	4,622.04	9.07%	9.22%	22.24%	29.04%	28.89%
		Total exposure to Taxonomy-aligned activities (currency)		KPI (1) (%)	KPI (2) (%)	% coverage (over total assets) (3) (%)	Non-assessed exposures (% of covered assets) (4) (%)	Non-assessed exposures (% of covered assets) (4) (%)
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
Additional KPIs	GAR (flow)	1,548.14	1,559.25	13.31%	13.41%	55.54%	34.39%	34.39%
	Trading book							
	Financial guarantees	20.01	25.26	1.63%	2.06%		99.96%	99.62%
	Assets under management							
	Fees and commissions income (5)							

(1) Based on the Turnover KPI of the counterparty.

(2) Based on the CapEx KPI of the counterparty.

(3) % of assets covered by the KPI over banks' total assets.

(4) In accordance with Article 7(8) of this Regulation.

(5) Fee and commission income from services other than lending and AuM.

Template 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation as of 31 December 2024.

		Total environmentally sustainable assets (million lei)	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 KPIs	Green Asset Rate (GAR) stock	2,558.77*	2.40%*	2.66%*	49.79%	72.83%	45.42%
		Total environmentally sustainable activities (million lei)	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 (on flow)	1,038.99	1.60%	1.45%	26.08%	82.36%	32.37%
	Trading book*						
	Financial guarantees	7.14	0.99%	8.79%			
	Assets under management	0.00	0.00%	0.00%			
	Fees and commissions income**						

* 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 forward looking 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

* Comparative figure restated in accordance with the contextual information presented in the section "Disclosures pursuant to Annex XI," point 4

Note 1: Across the reporting templates: cells shaded in black should not be reported.

Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2028. SMEs' inclusion in these KPI will only apply subject to a positive result of an impact assessment.

The full breakdown of the indicators is presented in Addendum 4 to the Statement. The indicators for the financial year 2025 are presented using the structure of the templates set out in Annex VI to Commission Delegated Regulation (EU) 2026/73. In addition, for comparability purposes, comparative information for the year 2024 is also presented, structured in accordance with the templates applicable to the comparative period, namely Annex VI to Commission Delegated Regulation (EU) 2021/2178.

The evolution of the GAR indicator is driven by a combination of economic and methodological factors.

From an economic perspective, the main factor is the expansion of the aligned residential mortgage loan portfolio, supported by improvements in data collection and processing (including through the use of OCR solutions), which have enabled the identification and reclassification of a larger volume of exposures as aligned. At the same time, for exposures to undertakings, the Group made progress in collecting and using counterparty-level alignment information (Turnover and CapEx) for entities within the scope of NFRD/CSRD reporting requirements, as well as in developing internal analyses regarding DNSH and MSS criteria, thereby contributing to the expansion of the perimeter of eligible and aligned assets.

From a methodological perspective, comparability with the previous year is affected by changes in the reporting framework regarding the determination of the GAR denominator. Starting with the 2025 financial year, certain categories of assets that were previously included in the calculation base are no longer considered in the denominator, including exposures not subject to NFRD/CSRD reporting requirements (including non-EU counterparties), derivative instruments, short-term interbank loans, cash and cash equivalents, as well as other categories of assets excluded under the revised framework. This adjustment to the calculation basis contributed to the increase in the GAR, independent of the actual evolution of the portfolio.

4. Use of estimates and professional judgment

Determining the eligibility and alignment of exposures with the EU Taxonomy involves, in certain situations, the use of estimates and professional judgment, particularly in the context of limitations regarding the availability and granularity of data.

These estimates are used exclusively in situations where the information required for the strict application of the Taxonomy criteria is not directly available and are based on the best information available at the reporting date.

With regard to the alignment of KUoP exposures, since the process of identifying eligible exposures resulted in a high number of exposures, and applying a full, individual DNSH analysis for all financed activities would have entailed a significant level of complexity, both in terms of the volume of exposures and of the data requirements associated with the EU

Taxonomy criteria, professional judgment was exercised to apply an additional materiality filter.

In this context, the alignment analysis was carried out as a priority exclusively for loans granted to financing of renewable energy projects, taking into account both the outstanding exposures as of 31 December 2025, relevant for stock indicators, and exposures granted during financial year 2025, used for flow indicators. For these exposures, the technical criteria, including those related to DNSH and, where applicable, MSS, can be assessed based on sufficient and verifiable information.

The Group intends, going forward, to improve its analysis methodology, including by extending the applicability of the DNSH analysis to a broader range of financed activities and by increasing the level of granularity of the data used, depending on the availability of relevant information.

5. Governance of the taxonomy assessment process

Implementing the EU Taxonomy requirements within the Group involves cross-departmental collaboration as well as a clear internal governance framework. The process of assessing the eligibility and alignment of exposures with the EU Taxonomy is coordinated at the Group level and involves the ESG Integration, risk management, business lines, finance and accounting, and other relevant support functions.

This governance framework aims to ensure consistent application of the assessment methodology, the quality of the data used, and transparent and credible reporting of taxonomy indicators.

The final results of the analysis are presented to executive management and are subject to review within the relevant governance structures, including the Audit Committee, prior to the publication of the report.

6. Limitations

The determination of the eligibility and alignment of exposures with the EU Taxonomy is based on information available at the time the reporting is prepared, on data published by counterparties, and on information collected through internal analysis processes. In this context, the analysis is subject to methodological limitation and data availability constraints, which may affect the coverage and level of the reported indicators.

In the case of UuoP exposures, the assessment of eligibility and alignment depends directly on the information published by counterparties regarding their EU Taxonomy indicators. Although the Bank's methodology included the analysis of counterparties in the portfolio that exceed the threshold of 500 employees and fall within the scope of sustainability reporting requirements, only some of these entities explicitly disclose information on the eligibility and alignment of their activities with the EU Taxonomy. In addition, in the case of certain groups of companies, EU Taxonomy information is presented exclusively at

consolidated level, without a breakdown at the level of the individual legal entities within the group. In such situations, the direct linkage between the indicators reported at group level and the activities of the entity financed by the Bank may be limited.

Consequently, the methodology adopted uses exclusively publicly available and verifiable information. In the absence of such information, exposures are prudently treated as non-aligned or non-eligible, as applicable. This limitation reflects the current stage of implementation of EU Taxonomy reporting in the market and is expected to gradually decrease as reporting obligations expand through the application of the CSRD.

Under economic activity 7.7 “Acquisition and ownership of buildings,” the EU Taxonomy provides that the eligibility of existing buildings may be demonstrated, inter alia, by such buildings being within the top 15% of the national building stock in terms of primary energy consumption. Applying this criteria requires the existence of a complete and representative national database on the energy performance of buildings, enabling the assessment of the distribution of primary energy demand. Currently, such a public analysis is not available for Romania.

In this context, the Bank uses energy class A, as per the EPC, as an indicator for assessing the eligibility of buildings constructed before 2021, in line with market practices adopted at the European level.

At the same time, for some of the exposures related to the acquisition of buildings constructed after 2020, the information available at the reporting date does not allow explicit confirmation of compliance with NZEB requirements. In the absence of complete and structured information in the available documentation that would allow verification of compliance with the NZEB standard within the meaning of the methodology set forth by the EU Taxonomy, these exposures were not included within the scope of exposures determined to be eligible or aligned.

The regulatory framework on the EU Taxonomy and sustainability reporting is in a continuous process of development. The amendments introduced by Delegated Regulation (EU) 2026/73 and the subsequent clarifications published by the European Commission reflect the evolving nature of this framework.

Therefore, future clarifications or regulatory amendments may require adjustments to the methodology applied or to the treatment of certain exposures in future reporting exercises.

2.2 Climate Change

E1-6 Gross Scope 1, Scope 2 and Scope 3 greenhouse gas (GHG) emissions and total GHG emissions

Carbon footprint

BT Group monitors and reports greenhouse gas emissions generated by its operational activities in accordance with the reporting requirements set forth in ESRS E1 – Climate Change and taking into account the recommendations of the Greenhouse Gas Protocol – Corporate Accounting and Reporting Standard.

The emissions inventory includes emissions generated by the Group's operational activities and is structured according to the GHG Protocol methodology into three main categories: Scope 1 (direct emissions), Scope 2 (indirect emissions from purchased energy), and Scope 3 (other indirect emissions).

Boundry of the emissions inventory

The greenhouse gas emissions inventory is prepared at the level of BT Group, in accordance with the scope of consolidation perimeter used in the Group's consolidated financial statements.

The reporting perimeter includes Banca Transilvania and the Group's subsidiaries that carry out operational activities, both in Romania and in the Republic of Moldova, for which there are relevant operational consumptions and available data on resource use.

The emissions inventory includes Group entities that generate operational consumption associated with their activities, such as energy, fuel, or other resources used in the course of operations.

The emissions inventory is primarily prepared using the operational control approach, in accordance with the methodological principles of the GHG Protocol, and includes emissions associated with activities over which the Group exercises operational control or for which it directly manages resource consumption.

Methodology for calculating emissions

Calculating the carbon footprint associated with the Group's operational activities involves the following main steps:

1. Defining emission categories

Emissions are classified in accordance with the GHG Protocol methodology as follows:

Scope 1 – Direct emissions

- stationary combustion of fuels used in heating equipment or other fixed installations;
- mobile combustion associated with the use of fuels in the Group's vehicle fleet;
- emissions resulting from the use and leakage of refrigerants from air conditioning and refrigeration equipment.

Scope 2 – Indirect emissions from purchased energy

- emissions associated with electricity consumed in the Group's buildings and operations;
- emissions associated with purchased thermal energy.

For purchased electricity, emissions are reported using two approaches:

- location-based, based on the emissions factor of the national energy mix;
- market-based, based on the contractual characteristics of the purchased energy.

Scope 3 – Other indirect emissions

The inventory includes the Scope 3 emission categories considered relevant to the Group's operational activities, namely those categories for which data is available and which adequately reflect the impact associated with the activities carried out. In this regard, the following categories have been included:

- purchased goods and services;
- capital goods;
- fuel and energy-related activities not included in Scope 1 or Scope 2;
- waste generated in operations;
- business travel;
- employee commuting.

Other Scope 3 emission categories defined by the GHG Protocol were not included in the current inventory, either due to their limited relevance to the Group's business model or due to limitations regarding the availability and quality of the data required for estimation. The Group aims to gradually expand the scope of Scope 3 emissions as internal data collection processes and the availability of information improve.

Financed emissions associated with loan and investment portfolios, which represent a distinct and material category for the BT Group, are analyzed and presented separately in the dedicated section, in accordance with the Partnership for Carbon Accounting Financials (PCAF) methodology.

2. Data Collection and Consolidation

Data on resource consumption and activities relevant to emissions generation are collected annually from Group entities and centralized at the consolidated level.

The data includes, among other things:

- electricity and heat consumption;
- consumption of fuels used in operational activities;
- use of refrigerants;
- quantities of waste generated in operations and methods of their treatment or disposal;
- relevant operational expenses used to estimate certain categories of indirect emissions;
- transportation activities and business travel.

3. Application of emission factors

Emissions are calculated by applying standardized emission factors, which reflect the amount of greenhouse gases emitted per unit of activity or consumption.

Results are expressed in tons of CO₂ equivalent (tCO₂e).

Sources used for emission factors

For estimating emissions, internationally recognised databases and methodological sources were used, including:

DESNZ / DEFRA – UK Government GHG Conversion Factors

The set of greenhouse gas conversion factors published annually by the UK government is one of the most widely used sources for corporate emissions reporting. It includes emission factors for fuels, electricity, transportation, water, waste, and other activities relevant to organizational emissions inventories.

EPA – GHG Emission Factors Hub

The U.S. Environmental Protection Agency (EPA) publishes sets of standardized emission factors used to estimate emissions from fuels, energy, transportation, and other operational activities. These are frequently used in corporate emissions inventories and in GHG Protocol-style organizational reporting.

IPCC Emission Factor Database (EFDB)

The Intergovernmental Panel on Climate Change (IPCC) database includes internationally recognized emission factors used in the preparation of national greenhouse gas emission inventories. This database provides scientifically validated emission factors for a wide range of sectors and activity types.

Eurostat – environmental accounts and emissions statistics

Eurostat provides statistics and datasets on environmental accounts and greenhouse gas emissions at the European Union level. These data are used in particular to estimate indirect emissions based on economic models and to analyze emissions associated with the consumption of goods and services.

Bilan Carbone® (ADEME)

The Bilan Carbone® methodology, developed by the French agency ADEME, provides a methodological framework for calculating the carbon footprint and includes an extensive database of emission factors used to estimate emissions over the life cycle of products and services.

ANRE – information on the national energy mix

Data published by ANRE on the energy mix and the structure of electricity production in Romania are used to estimate emissions associated with electricity consumption in the location-based approach, reflecting the characteristics of the national energy system.

The use of these sources ensures methodological consistency and the comparability of the emissions inventory with internationally accepted practices.

EXIOBASE

EXIOBASE is a multi-regional input-output (MRIO) database used to analyze economic flows and the environmental impacts associated with economic activities at the global level. It integrates data on production, consumption, and trade between sectors and regions, correlated with environmental indicators, including greenhouse gas emissions.

Governance of the emissions calculation and reporting process

The process of collecting data and calculating greenhouse gas emissions at the BT Group level is coordinated by the Procurement Department, in collaboration with other relevant operational units of the Group.

Data on energy consumption and relevant operational activities are collected from Group entities and from the departments responsible for building administration, logistics, procurement, human resources, and other support functions.

The process includes:

- collecting operational data;
- verifying and reconciling this data at the Group entity level;
- applying emission factors;
- consolidating the emissions inventory at the Group level.

The results are integrated into the annual sustainability reporting process and are included in the Group's Sustainability Statement.

Evolution of greenhouse gas emissions

The table below presents the evolution of greenhouse gas emissions generated by the Group's operational activities during the 2024–2025 period.

Scope	Activitate	2025 (TCO ₂)	2024 (TCO ₂)	Variație (2025 vs.2024)
Scope 1	Scope 1 - Total	8,795.24	7,643.98	15.06%
Scope 1	Combustion in stationary sources	3,951.03	3,411.54	15.81%
Scope 1	Combustion in mobile sources	4,009.55	3,787.74	5.86%
Scope 1	Refrigerants	834.66	444.70	87.69%
Scope 2	Scope 2 – Total – Location-based	7,027.79	4,554.87	54.29%
Scope 2	Scope 2 – Total – Market-based	1,803.61	1,755.12	2.76%
Scope 2	Purchased electricity (location-based)	6,826.29	4,169.78	63.71%
Scope 2	Purchased electricity (market-based)	1,602.11	1,370.01	16.94%
Scope 2	Thermal energy	201.50	385.11	-47.68%
Scope 3	Total upstream Scope 3	55,471.98	45,895.75	20.87%
Scope 3	Category 1: Purchased goods and services	42,991.40	38,888.55	10.55%
Scope 3	Category 2: Capital goods	5,584.23	1,109.49	403.32%
Scope 3	Category 3: Fuel and energy-related activities (not included in Scope 1 or 2)	3,472.27	3,045.00	14.03%
Scope 3	Category 5: Waste generated in operations	1,821.71	1,883.39	-3.27%
Scope 3	Category 6: Business travel	1,581.24	948.81	66.66%
	<i>Business travel – by air or train</i>	<i>1,222.96</i>	<i>818.93</i>	<i>49.34%</i>
	<i>Business travel – hotels</i>	<i>358.29</i>	<i>129.88</i>	<i>175.86%</i>
Scope 3	Category 7: Employee commuting	21.13	20.51	3.02%
Scope 3	Total upstream Scope 3	6,232,701	2,499,823	149.33%
Scope 3	Category 15: Investments	6,232,701	2,499,823	149.33%
Scope 3	Scope 3 – Total	6,288,173	2,545,719	147.01%
Total	Total Emissions - location-based	6,303,996	2,557,918	146.45%
Total	Total Emissions - market-based	6,289,771	2,555,118	146.52%

Emissions intensity (tCO ₂ / million RON)		2025	2024 ¹	Variație 2025 vs. 2024
Scope 1	Scope 1 - Total	0.75	0.70	6.22%
Scope 2	Scope 2: Total - Location-based	0.60	0.42	42.44%
Scope 2	Scope 2: Total - Market-based	0.15	0.16	-5.13%
Scope 3	Total upstream Scope 3	4.71	4.22	11.58%
Scope 3	Total upstream Scope 3 excluding Scope 3 clients*	214.26	229.83 ²	-6.77%
Scope 3	Total downstream Scope 3	529.00	229.83	130.18%
Scope 3	Scope 3 – Total	533.71	234.04	128.04%
Total	Total Emissions - location-based	535.06	235.17	127.52%
Total	Total Emissions - market-based	534.61	234.91	127.58%

¹ In the current year, the Group reassessed emissions intensity by considering net revenues (as at 31 December 2024, intensity was reported relative to turnover). In addition, the Group considers it appropriate in the current year to provide a more detailed presentation of emissions intensity.

² See the section “Financed emissions”.

* The Group reports emissions intensity calculated in relation to all Scope 3 emissions in accordance with ESRS E1-6 DR. However, given that the estimated client Scope 3 emissions are included in the total downstream Scope 3 emissions, the Group considers it appropriate to also present an adjusted intensity excluding these values, in order to preserve comparability with the previous reporting period and to avoid double counting of emissions attributed to the financed portfolio.

For the calculation of greenhouse gas emissions intensity, the indicator was reported against consolidated net income, determined based on the consolidated profit and loss account, in accordance with the Group’s consolidated financial statements.

Emissions related to sovereign bonds are not included in total financed emissions, as this would lead to double reporting: states already disclose their emissions at sovereign level, and reintroducing them in the financed portfolio would lead to double counting of values attributed to the Group. At the same time, investors in sovereign bonds do not have operational control over, nor influence on, a sovereign’s emissions, unlike equity or corporate bond exposures, where the exercise of control may contribute to steering emissions onto a decarbonisation pathway.

Analysis of the evolution of emissions generated by the BT Group’s activities

In 2025, total greenhouse gas emissions generated by the operational activities of the BT Group recorded, overall, an increase compared to the previous year. Their evolution mainly reflects the dynamics of the Group’s operational activity and the expansion of the volume of operations carried out. The absolute increase in operational emissions primarily reflects the expansion of activities and operations. For financial institutions, the level of operational emissions is directly influenced by the size of the operational network, the number of employees, and the infrastructure used to carry out activities.

Given the specific nature of the business model of a financial institution, the emissions generated by operational activities represent a relatively limited component of the total carbon footprint associated with the Group's activity. The significant climate impact of the banking sector is primarily driven by the financed emissions associated with the loan and investment portfolios, which are calculated and analysed separately in accordance with the PCAF methodology.

The significant increase observed in total emissions and emissions intensity in 2025 compared to 2024 is primarily driven by downstream Scope 3 emissions. This trend primarily reflects the update to the calculation methodology applied starting with the 2025 reporting, which led to a more comprehensive capture of indirect emissions associated with loan and investment portfolios. The new methodological approach uses intensity factors determined based on an EE-MRIO model, which more accurately reflects emissions generated throughout the value chain and consequently leads to an increase in reported Scope 3 emissions, particularly downstream.

Methodological limitations and use of estimates

The carbon footprint is calculated based on data available at the reporting date and in accordance with the GHG Protocol methodology.

In certain cases, the estimation of emissions involves the use of standardised emission factors or estimation methods, in particular for certain categories of indirect Scope 3 emissions, where primary data may be limited.

In situations where the calculation methodology or emission factors are updated, the values reported for previous periods may be recalculated to ensure the comparability of the data series over time.

The Group aims to continuously improve the data collection process and expand the coverage of the emissions inventory.

Financed emissions

Methodological Framework

Financed emissions represent the main component of the indirect carbon footprint associated with the Group's lending and investment activities and reflect the greenhouse gas emissions generated by the economic activities financed through its portfolios.

The methodology used to estimate the Group's financed emissions is built on the recommendations of the Partnership for Carbon Accounting Financials (PCAF), in particular the methodological framework presented in the standard "The Global GHG Accounting and Reporting Standard for the Financial Industry – Part A: Financed Emissions, Second Edition (2022)".

This standard provides guidance for estimating and reporting greenhouse gas emissions associated with the loan and investment portfolios of financial institutions, enabling the assessment of the climate impact of financed activities and the monitoring of its evolution over time.

In applying this framework, the Group uses the principles and formulas recommended by the PCAF methodology, adapted according to data availability and the characteristics of the analyzed portfolio.

The calculation of financed emissions is performed annually and covers the relevant loan and investment portfolios of the entities within the Group that manage such exposures.

The assumptions used, methodological limitations, and key professional judgments applied in the estimation process are presented in a separate section of this methodology.

Developments in the PCAF Standard

On 2 December 2025, PCAF published the third edition of the Global GHG Accounting and Reporting Standard for the Financial Industry – Part A: Financed Emissions.

The update to the standard introduces additional methodologies for certain types of financial exposures and complementary guidance on reporting avoided emissions and forward-looking metrics. However, the methodologies applicable to the main banking assets classes relevant to the Group, such as business loans, real estate loans, and motor vehicle loans, have not undergone substantial changes.

Given the timing of publication of this update, the Group has not yet applied the new version of the standard in the calculation of financed emissions for reporting year 2025. Any relevant methodological updates will be analysed and integrated into future reporting cycles.

Scope of application of the methodology

The methodology described in this section applies to the calculation of financed emissions related to the Group's loan and investment portfolio as of the reference date of 31 December 2025.

The analysed perimeter includes the relevant exposures from the portfolios of the entities within the financial consolidation perimeter of BT Group that manage lending or investment activities and that fall within the scope of this methodology. These are:

- Banca Transilvania
- Victoriabank
- O.C.N. Microinvest
- Salt Bank
- BT Microfinanțare

- BT Leasing Transylvania
- BT Leasing Moldova
- BT Asset Management
- INNO Investments
- BT Pensions
- BRD Pensions
- BT Investments
- BT Invest1 Closed-End Investment Fund
- Improvement Credit Collection

From a geographical perspective, the financed emissions assessment covers the main regions in which the Group carries out operational activities:

- Romania, the Group's primary market;
- the Republic of Moldova, through the presence of the subsidiaries Victoriabank, BT Leasing Moldova, and Microinvest.

Comparative information for the prior period (31 December 2024) is presented for informational purposes and was determined based on the perimeter and methodology applied at the time of that reporting. Differences between the results reported for the analyzed periods may reflect changes in the scope of application, data availability, or the methodological assumptions used in the process of estimating financed emissions.

Classification of exposures in according with the PCAF methodology

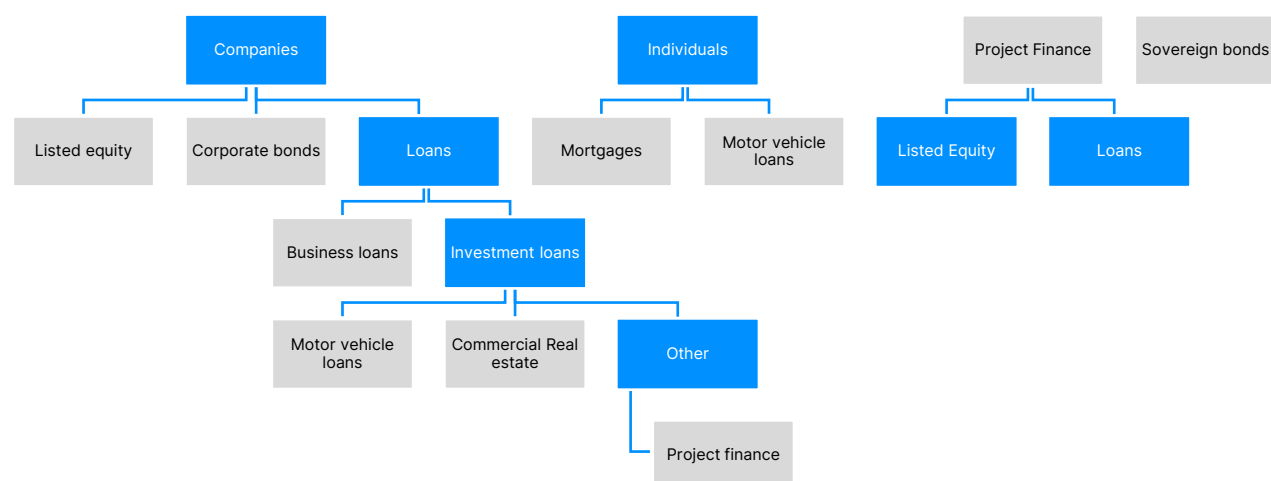
The exposures included in the calculation of financed emissions are classified in accordance with the asset classes defined by the PCAF methodology, depending on the type of financial instrument and the purpose of the financing.

The main categories of exposures analyzed are:

- business loans;
- project finance;
- commercial real estate;
- residential real estate;
- motor vehicle loans;
- equity instruments;
- corporate bonds;
- sovereign bonds.

The classification of exposures is performed based on the type of counterparty and the characteristics of the financial instrument, using the information available in the Group's internal systems.

The exposure classification structure used in the calculation of financed issues is illustrated in the diagram below.



Data sources used

The determination of financed issues is based on a combination of internal and external data.

Financial data

The financial data used includes:

- the gross carrying amount of loans and investments;
- total revenues of counterparties;
- equity and debt;
- market capitalization for listed companies.

This information is collected from:

- the Group's internal systems;
- the financial statements of counterparties;
- external platforms, such as Bloomberg.

In all cases, there is a one-year lag between the reporting date of financed emissions and the period to which the financial data used refers, due to differences between the reporting deadlines applicable to financial institutions and those applicable to companies.

Emissions Data

Emissions data are collected from multiple sources, including:

- companies' public disclosures;
- the Bloomberg platform;

- the EDGAR database on global emissions;
- the PCAF database on building emission factors;
- the European Environment Agency's database on vehicle emissions;
- the EXIOBASE database.

Selection of emission factors

Greenhouse gas emissions associated with credit and investment portfolios are estimated using, in order of priority, the following types of data:

1. emissions reported directly by counterparties;
2. emissions estimated based on the characteristics of the financed asset and available operational data;
3. emissions estimated based on economic activities, using emission intensity factors.

1. Directly reported emissions

When available, the Group uses emissions reported directly by counterparties in their sustainability reports, annual reports, or other public documents. The information is collected from external platforms, such as Bloomberg, or from clients' public reports.

Currently, only a limited number of financed companies publish carbon footprint information, and collecting this information from public reports remains difficult to scale across the entire portfolio.

2. Estimated emissions based on the characteristics of the financed asset and available operational data

The Group does not currently use, on a systematic basis, primary operational data reported directly by corporate clients, such as fuel consumption, energy consumption or production volumes. However, for certain asset classes, such as real estate loans and motor vehicle loans, specific characteristics of the financed asset are used to select more granular emission factors.

In the case of real estate loans, where this information is available, the building type and the energy performance certificate are used to select the corresponding emission factors from the PCAF database. In the case of car loans, the estimation of emissions takes into account relevant vehicle characteristics, such as make, model and fuel type.

3. Estimated Emissions Based on Economic Activities

In situations where directly reported emissions or asset-specific data are not available, the Group uses emission intensity factors to estimate emissions associated with counterparties.

Methodological update applied starting with the reporting as at 2025

Starting with the reporting for December 31, 2025, the Group has updated the methodology used to estimate the emission intensity factors applied to loan and investment portfolios.

In previous reporting periods, the estimation of emissions associated with corporate counterparties was based on sectoral emission factors calculated for the Romanian economy, derived from statistics published by the National Institute of Statistics. These factors reflected the average intensity of direct emissions (Scope 1) at the level of economic sectors.

For counterparties located in other jurisdictions, these factors were adjusted by applying a multiplier based on the ratio between each country's greenhouse gas emissions relative to GDP (PPP) and those of Romania.

Under the updated methodology, emission intensity factors are determined using an environmentally extended multi-regional input-output (EE-MRIO) model based on the EXIOBASE v3.8.2 database, which integrates global economic and environmental information at global level.

The model uses intersectoral relationships in the economy to estimate the emission intensities associated with economic output, by applying the input-output analytical framework developed by Leontief. In this context:

- Scope 1 emission intensities are determined based on direct emissions reported in the environmental accounts of the EXIOBASE database for each economic sector and for each country;
- Scope 2 and Scope 3 upstream intensities are derived using the intersectoral relationships within the input-output model, by propagating indirect effects along supply chains via the Leontief inverse.

This approach allows for the estimation of total emission intensities for each economic sector, as well as the separation of the contributions relating to Scope 1, Scope 2 and upstream Scope 3, expressed in tCO₂e per RON million of economic activity.

For the consistent application of these factors to the Group's portfolio, a mapping was performed between the classification of economic activities used in the internal systems and the EXIOBASE sectors. As the European statistics used starting with 2025 apply NACE Rev. 2.1, while the historical series and correspondences used in the EXIOBASE model are built on the basis of an earlier classification, the loan and investment portfolio was transposed from NACE Rev. 2.1 into NACE Rev. 2 to allow the consistent application of the available intensity factors.

The output of the model consists of a set of emission intensity factors at country and aggregated economic sector level, corresponding to sectors A–U according to the NACE

Rev. 2 classification, which are subsequently used in the algorithm for calculating financed emissions for corporate counterparties in the Group's portfolios.

The intensity factors estimated based on the EXIOBASE data model are reviewed and updated annually using the most recent version of the database available at the time of calculation. Given the nature of EE-MRIO databases, these updates are inherently based on historical series available with a certain time lag relative to the reporting year.

Determination of allocation factors

The attribution factor reflects the proportion of a counterparty's total emissions that can be allocated to the financial institution based on the level of financing granted. In accordance with the PCAF methodology, it is determined by comparing the value of the Group's exposure with a measure of the total value of the counterparty or the financed asset.

The formula used to calculate the attribution factor differs depending on the type of financial exposure and the characteristics of the counterparty, as presented in the table below.

Exposure type	Calculation basis	Attribution factor formula
Business loans, project finance loans, equity instruments, and corporate bonds – listed counterparties	Enterprise Value Including Cash (EVIC)	Attribution factor = Credit balance / EVIC
Business loans, project finance loans, equity instruments, and corporate bonds – unlisted counterparties	Total liabilities + equity	Attribution factor = Credit balance / (Total liabilities + equity)
Sovereign debt	GDP at purchasing power parity (PPP GDP), expressed in RON equivalent	Attribution factor = Investment balance / PPPGDP_USD (RON equivalent)
Commercial and residential real estate loans	Property value at the time the loan was granted	Attribution factor = Loan balance / Property value at the time the loan was originated
Motor vehicle loans	Vehicle value at the time the loan was granted	Attribution factor = Loan balance / The value of the vehicle at the time the loan was originated

For listed corporate exposures, the Enterprise Value Including Cash (EVIC) indicator is used to determine the allocation factor when available, as it reflects the total value of the company from the perspective of invested capital. In situations where this indicator is not available, the Group uses as a proxy the sum of the counterparty's total liabilities and equity.

To avoid over-allocation of issues in situations where the Group has multiple exposures to the same counterparty, the allocation factors are aggregated at the client level, and the total allocation factor for a counterparty is capped at a maximum value of 1. This limitation ensures that a counterparty's total emissions are not allocated to the financial institution in excess of 100% and prevents double-counting of emissions within the portfolio.

In the case of project finance, in the absence of detailed information regarding the financing structure and the total value of the project, the Group applies the same methodology for determining the attribution factor for business loans. The limitations associated with this approach are presented in the section dedicated to methodological limitations.

Calculation of total emissions

Total emissions represent the total amount of greenhouse gases associated with the economic activities carried out by financed counterparties. These constitute the basis of calculation for determining the Group's financed emissions, after application of the attribution factor.

In situations where directly reported emissions from counterparties are not available, the Group uses estimates based on sectoral intensity factors derived from input-output economic models or internationally recognised sectoral databases.

The estimation methods used for the main categories of exposures are presented in the table below.

Exposure type	Method for estimating total emissions	Formula used	Data sources
Business loans, project finance loans, equity instruments, and corporate bonds	Estimate based on sectoral emission intensity relative to the counterparty's economic activity	Total emissions = Total revenue × Sectoral emissions (tCO ₂ e / million RON)/10 ⁶	Intensity factors estimated using the EE-MRIO (EXIOBASE) model, which integrates global economic and environmental data and enables the estimation of direct and indirect emissions by economic sector
Sovereign debt	Estimate based on the country's total emissions relative to economic activity	Total emissions = Country's total emissions (tCO ₂ e)	World Bank – GDP at purchasing power parity (PPP); EDGAR – national greenhouse gas emissions
Commercial real estate loans	Estimate based on the building's floor area and the average emissions intensity () for commercial buildings	Total emissions = Built-up area × Emissions per m ² for commercial buildings (tCO ₂ e / m ²)	PCAF Real Estate Database
Mortgages	Estimate based on dwelling area and emissions intensity for residential buildings	Total emissions = Built area × Emissions per m ² for residential buildings (tCO ₂ e / m ²)	PCAF Real Estate Database

Motor vehicle loans	Estimate based on distance traveled and vehicle-specific emission factors	Total emissions = Distance traveled × Emissions per kilometer (gCO ₂) / 10 ⁶	European Environment Agency (EEA)

Calculation of financed emissions

Financed emissions represent the share of the counterparties' total emissions that can be attributed to the Group's financing. They are determined by applying the attribution factor, which reflects the proportion of the Group's exposure relative to the total value of the counterparty or the financed asset.

The rules used for calculating financed emissions are presented in the table below.

Scenario	Calculation method	Formula / approach applied
Attribution factor > 1	Financed emissions are capped at the level of the counterparty's total emissions	Financed emissions = Total emissions
Attribution factor ≤ 1	Financed emissions are calculated proportionally to the Group's exposure	Financed emissions = Total emissions × Attribution factor
Attribution factor = 0 or total emissions unavailable	An average emissions intensity determined at the level of the asset class and economic sector is used	Estimated financed emissions = Average intensity × Exposure

In cases where the attribution factor is zero or cannot be determined due to the unavailability of necessary information, as well as in cases where the counterparty's total emissions are not available, the Group uses an average emissions intensity calculated at the level of the relevant asset class and economic sector.

This average intensity is determined as the ratio of the total estimated financed emissions for exposures in the same asset class and economic sector to the total value of on-balance-sheet exposures related to these categories.

Applying this approach allows for the estimation of financed emissions for exposures for which individual data are not available, while ensuring methodological consistency and comparability of estimates across the entire portfolio.

Data Quality Score (DQS)

To assess the quality of the data used in calculating financed emissions, the Group applies the Data Quality Score (DQS) indicator, in accordance with the PCAF methodology. This indicator reflects the degree of reliability and granularity of the data used in estimating emissions and allows for the assessment of the level of uncertainty associated with the reported results.

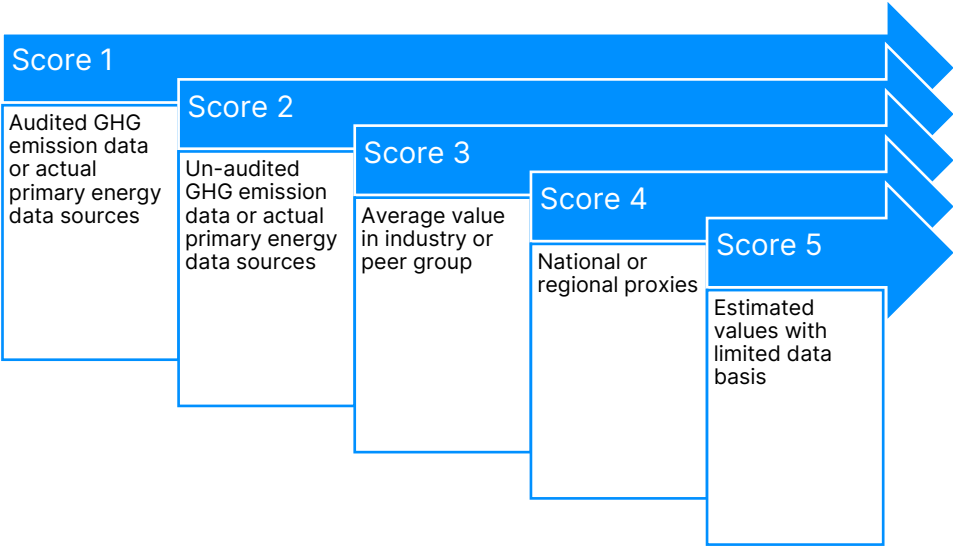
The DQS is expressed on a scale where lower values indicate higher data quality, and higher values reflect the use of estimates based on proxies or sectoral factors. In general, emissions data reported directly by counterparties and independently verified are considered to be of the highest quality, while estimates based on sectoral intensity factors or average values imply a higher degree of uncertainty.

The publication of DQS scores provides users of the report with insight into the degree of confidence that can be placed in the reported financed emissions and allows for a better understanding of the methodological limitations associated with them. At the same time, the indicator is used by the Group as a tool for the continuous improvement of data quality

Within the Group, DQS scores are assigned to different asset classes as follows:

DQS Score	Exposure type / estimation method
2	Emissions reported directly by counterparties in public reports; sovereign bonds
3	Residential and commercial real estate loans
4	Business loans, debt and equity instruments
5	Motor vehicle loans
5.1	Exposures for which financed emissions are estimated using asset class-level average intensities

The diagram below illustrates the DQS score scale, where a lower score indicates higher quality of the data used in the calculation of financed emissions.



Assumptions, limitations, and professional judgments

The estimation of financed emissions involves the use of methodological assumptions and estimates based on the available data regarding the economic activity and emissions of financed counterparties. The calculation is performed based on the recommendations of the PCAF methodology, but in certain situations involves the use of proxies and sectoral intensity factors.

Availability and quality of data

The availability of greenhouse gas emissions data reported by counterparties remains limited, especially for companies that are not subject to sustainability reporting obligations. In these situations, the Group uses estimates based on emission intensity factors derived from economic models and sectoral databases.

In addition, there is inherently a time lag between the financed emissions reporting period and the period to which the counterparties' financial data relate, because companies' financial and sustainability information is published with a delay relative to the reporting date of financial institutions.

Use of estimated emission factors

In estimating emissions for corporate counterparties, the Group uses intensity factors derived from the EXIOBASE database, which is based on historical series and sectoral classifications used at the time the model was built. In order to apply these factors to the portfolio reported starting with 2025, exposures classified in internal systems in accordance with NACE Rev. 2.1 were transposed into NACE Rev. 2, using the statistical correspondences between the two classifications. This conversion involves the use of methodological judgement and reflects the inherent limitations associated with the use of EE-MRIO macroeconomic databases.

Assumptions used for certain asset classes

For certain types of exposures, the estimation of emissions involves the use of standardized assumptions when specific data are not available.

For commercial and residential real estate loans, where information regarding usable floor area or the energy performance of buildings is not available, standardised values are used, namely an estimated usable floor area of 70 m² and an EPC energy classification of C.

In the case of car loans, the estimation of emissions is based on a standardised vehicle travel distance of 50,000 km, as well as on emission factors specific to the vehicle type taken from the European Environment Agency database. For electric vehicles, emissions are estimated based on the vehicle's electricity consumption and the emission intensity

associated with electricity generation at national level, using an estimated average consumption of 15.5 kWh per 100 km.

Methodological limitations regarding certain types of exposures

In the case of project finance, the PCAF methodology recommends the use of detailed information regarding the project's capital structure. In situations where such information is not systematically available, the Group applies the same methodology used for business loans to determine the attribution factor.

This approach allows the maintenance of methodological consistency at portfolio level; however, it may lead to less precise estimates for certain individual projects.

Professional Judgment Applied

The application of the PCAF methodology involves the use of professional judgment in selecting data sources, choosing the proxies used to determine attribution factors, and estimating emissions for exposures for which individual data are not available.

For example, for listed corporate exposures for which the Enterprise Value Including Cash (EVIC) indicator is not available, the Group uses as a proxy the sum of the counterparty's total liabilities and equity.

Presentation of Results

Based on the described methodology, the Group estimates the financed emissions associated with the loan and investment portfolio using the principles and formulas recommended by the PCAF methodological framework, adapted according to data availability and the specific characteristics of each asset class.

The table below presents the results of these estimates, broken down by main asset classes and by economic sectors for the Business Loans category, including the level of exposures covered by the analysis, the associated financed emissions (Scope 1 + Scope 2 and downstream Scope 3), the emissions intensity, and the weighted average data quality score (DQS). The information is presented for the reference date of 31 December 2025, and, for comparison purposes, for 31 December 2024.

Asset class/Activity	Balance of covered exposures and investments (million RON)	Balance of covered exposures and investments (million RON)	Emissions Scope 1+ Scope 2 (tCO ₂ e)	Emissions Scope 1+ Scope 2 (tCO ₂ e)	Emissions Scope 3 upstream	Emissions Scope 3 upstream	Total financed emissions (tCO ₂ e)	Total financed emissions (tCO ₂ e)	Emissions Intensity Scope1+Scope2 (tCO ₂ e/mil. RON)	Emissions Intensity Scope1+Scope2 (tCO ₂ e/mil. RON)	Emissions Intensity Scope3 upstream (tCO ₂ e/mil. RON)	Emissions Intensity Scope3 upstream (tCO ₂ e/mil. RON)	Weighted average data quality score (DQS)	Weighted average data quality score (DQS)
	2025	2024(*)	2025	2024(*)	2025	2024(*)	2025	2024(*)	2025	2024(*)	2025	2024(*)	2025	2024(*)
Business Loans	36,035	35,281	1,863,646	1,879,504	2,977,974	0	4,841,620	1,879,504	51.72	53.27	82.64	0	4.00	4.10
A. Agriculture, forestry, and fishing	5,602	5,426	662,717	624,767	372,925	0	1,035,642	624,767	118.29	115.14	66.57	0	4.12	4.21
B. Mining and Quarrying	149	124	43,192	15,748	17,297	0	60,498	15,748	290.33	127.23	116.27	0	3.94	4.19
C. Manufacturing	5,616	5,920	264,320	475,935	739,123	0	1,003,443	475,935	47.06	80.39	131.60	0	3.91	3.87
D. Electricity, gas, steam and air conditioning supply	1,221	1,131	321,702	153,770	125,837	0	447,539	153,770	263.39	135.99	103.03	0	4.33	4.37
E. Water supply; sewerage, waste management and remediation activities	355	328	118,916	88,097	38,921	0	157,837	88,097	335.07	268.95	109.67	0	3.99	4.08
F. Construction	3,160	3,233	70,257	83,825	404,204	0	474,461	83,825	22.23	25.93	127.90	0	4.01	4.13
G. Wholesale and retail trade; repair of motor vehicles and motorcycles	9,502	9,414	96,238	49,834	562,281	0	658,519	49,834	10.13	5.29	59.18	0	3.82	4.03
H. Transportation and Storage	3,086	2,791	81,768	213,946	187,774	0	269,542	213,946	26.49	76.65	60.84	0	3.76	4.05
I. Accommodation and food service activities	1,186	1,005	61,716	11,775	248,123	0	309,838	11,775	52.05	11.72	209.26	0	4.05	4.06
J. Information and communications	822	397	9,151	3,356	35,605	0	44,755	3,356	11.13	8.46	43.29	0	4.01	4.04
K. Financial and insurance activities	906	1,172	41,930	49,511	32,807	0	74,738	49,511	46.28	42.24	36.21	0	4.87	4.90
L. Real estate activities	608	807	1,181	4,197	1,966	0	3,147	4,197	1.94	5.20	3.23	0	4.02	4.22
M. Professional, scientific, and technical activities	960	846	27,061	21,046	48,298	0	75,358	21,046	28.17	24.88	50.29	0	4.06	4.09
N. Administrative and support service activities	743	630	7,873	17,870	27,848	0	35,721	17,870	10.60	28.37	37.49	0	4.04	4.14
O. Public administration and defense; compulsory social security	6	2	249	81	361	0	610	81	39.91	37.21	57.77	0	4.78	4.46
P. Education	103	86	1,208	15,307	2,533	0	3,742	15,307	11.68	177.80	24.48	0	4.07	4.08
Q. Human health and social work activities	1,420	1,204	28,145	32,662	85,314	0	113,458	32,662	19.82	27.14	60.08	0	4.24	4.27
R. Arts, entertainment, and recreation	240	571	11,903	9,165	18,791	0	30,694	9,165	49.46	16.04	78.36	0	5.04	4.04
S. Other service activities	345	194	13,965	8,558	27,722	0	41,687	8,558	40.42	44.22	80.24	0	4.67	4.22
T. Activities of households as employers; undifferentiated goods- and services-producing activities of households for own use	3	1	146	51	229	0	375	51	52.39	57.58	82.34	0	5.10	5.10
U. Activities of extraterritorial organisations and bodies	0	0	9	0	15	0	24	0	50.46	57.36	82.08	0	5.10	5.10
Project Finance	11,537	7,622	288,827	117,294	717,716	0	1,006,543	117,294	25.03	15.39	62.21	0	3.76	4.13
Mortgages	18,981	18,678	113,379	119,346	0	0	113,379	119,346	5.97	6.39	0.00	0	3.01	3.00
Commercial Real Estate	1,944	1,783	31,423	63,522	0	0	31,423	63,522	16.17	35.62	0.00	0	3.00	3.00
Motor Vehicle Loans	5,982	5,359	224,049	310,445	0	0	224,049	310,445	37.45	57.92	0.00	0	5.00	5.00
Corporate Bonds	4,764	5,648	2,226	7,818	9,693	0	11,919	7,818	0.47	1.38	2.03	0	3.77	3.73
Listed equity	1,055	799	792	1,894	2,975	0	3,767	1,894	0.75	2.37	2.82	0	3.29	3.62
Sovereign Debt	72,464	69,717	1,903,289	1,946,602	0	0	1,903,289	1,946,602	26.27	27.92	0.00	0	2.23	2.00
Total	152,763	144,888	4,427,631	4,446,425	3,708,358	0	8,135,989	4,446,425	28.98	30.69	24.28	0	3.03	2.95

(*)Comparative figures for 2024 have been restated, and detailed information regarding the restatement is presented in the following table

Restated figures for Category 15 – Scope 3, as of December 31, 2024

Active	Balance of covered exposures and investments in the prior period (RON)	Balance of covered exposures and investments in the prior period – Restated amount (RON)	Difference	Financed emissions for the previous period (tone CO ₂)	Financed emissions for the previous period – restated value (tone CO ₂)*	Difference	Emissions intensity for the previous period (tCO ₂ / mil. lei)	Emissions intensity for the previous period – restated value (tCO ₂ / mil. lei)	Difference
Business Loans	35,561,288,131	35,281,187,649	(280,100,482)	1,742,889	1,879,504	(136,615)	49.01	53.27	4.26
Commercial Real Estate	1,490,052,605	1,783,451,553	293,398,948	57,430	63,522	(6,091)	38.54	35.62	(2.93)
Mortgages	18,677,649,093	18,677,649,093	-	120,383	119,346	1,037	6.45	6.39	(0.06)
Project Finance	7,622,360,474	7,622,360,474	-	81,830	117,294	(35,464)	10.74	15.39	4.65
Motor Vehicle Loans	5,372,742,696	5,359,444,229	(13,298,467)	311,201	310,445	756	57.92	57.92	0.00
Corporate Bonds	5,648,302,466	5,648,302,466	-	7,818	7,818	-	1.38	1.38	-
Listed Equity	799,014,722	799,014,722	-	1,894	1,894	-	2.37	2.37	-
Sovereign Debt	69,717,042,741	69,717,042,741	-	1,946,602	1,946,602	-	27.92	27.92	-
Grand Total	144,888,452,928	144,888,452,928	-	4,270,048	4,446,425	(176,378)	29.47	30.69	1.22

*Restated comparative figure, taking into account adjustments related to corrections resulting from NACE code mapping, as well as other methodological adjustments resulting from improvements in data collection and processing, including corrections regarding the classification of exposures between loans for business activities (business loans) and loans secured by commercial real estate (ESRS 1 c).

The variations recorded between the current reporting period (2025) and the comparative period (2024) reflect both developments in the exposure portfolio and improvements in the methodological framework used to estimate financed emissions.

The increase in total emissions is primarily driven by the update of the model for estimating indirect emissions, including the use of revised emission factors and the development of a calculation framework for Scope 2 and Scope 3, applicable in situations where data reported by counterparties is not available. These methodological improvements have enabled the expansion of estimates to the portfolio level, including the inclusion of Scope 3 upstream emissions related to business loans and project finance, for which estimates were not available in the previous period.

This development primarily reflects an increase in the coverage and level of detail of the estimates and does not directly indicate a change in the climate profile of the exposures.

At the same time, the update of the emission factors used to estimate Scope 1 emissions (by using factors derived from the EXIOBASE database for certain segments), as well as the improvement of the process for mapping exposures to PCAF categories and the alignment of sectoral classification with NACE Rev. 2, further contribute to the observed variations.

Differences at the sectoral level are also influenced by changes in the volume and structure of the portfolio, including increases in exposures in certain high-emission sectors.

In this context, comparability between the two periods is limited, and the variations should be interpreted primarily as the result of methodological refinements and an expansion of the coverage of the estimates.

E1-2 Policies related to climate change mitigation and adaptation

Analysis of the physical and transition climate risks to which BT clients' funded activities and projects are exposed

Climate change continues to be one of the most pressing global challenges, with significant implications for the economy, the environment, and society. As part of the 2025 double materiality analysis, all three sub-themes related to climate change, namely climate change mitigation, climate change adaptation, and energy, were confirmed as material for BT Group, both from the perspective of the direct impact of its own operations (climate change mitigation and energy) and the indirect impact generated through its lending portfolio, as well as from the perspective of associated financial risks and opportunities, including through the lens of growing demand for sustainable financing products and solutions.

From the perspective of its own operations, the Group's impact manifests itself through greenhouse gas emissions, generated primarily from the consumption of electricity and heat and from the use of vehicles for transportation. The indirect impact generated through the financing portfolio manifests itself both positively and negatively. Lending to climate change adaptation projects and financing renewable energy contributes to climate change mitigation, while financing sectors such as mixed farming, construction, or manufacturing can have a negative environmental impact in the absence of adequate emission reduction measures.

Financing sectors exposed to physical climate risks, such as agriculture, construction, or transportation, may affect the repayment capacity of financed companies in the context of intensifying extreme weather events. At the same time, reliance on high-carbon energy sources creates transition risks through exposure to increasingly stringent regulations and pressure to reduce emissions. In terms of our own operations, extreme weather events and changes in the regulatory framework can lead to higher operational costs and reputational risks.

The transition to a low-carbon economy also creates significant opportunities for the Group through the financing of renewable energy projects, electric vehicle infrastructure, sustainable construction, and energy efficiency solutions. By developing financial products tailored to these sectors, the Group can strengthen its position in the field of sustainable finance and contribute to the transition toward a greener economy, generating long-term value for customers, shareholders, and the community.

In this context, integrating climate criteria into the decision to grant financing is essential. An important element in the lending process is ESG risk analysis.

ESG Analysis Workflow

ESG analysis is conducted using five distinct analysis forms, applicable to clients based on the proposed exposure. The complexity of the forms increases primarily with the client's exposure and size (ranging from a simplified form containing questions regarding compliance with legal requirements on ESG, labor, and environmental protection, to a detailed form covering a wide range of topics, including aspects related to the company's exposure to climate risks, waste management processes, measures to improve consumption, energy efficiency, and others).

At the BT Group level, Banca Transilvania's subsidiaries adopt Banca Transilvania's model and develop and implement their own ESG policies, regulations, and standards. The table below shows the status of subsidiaries that have adopted a policy or standard for managing ESG risks.

Entity	Type of document developed	Brief description
BT Microfinanțare IFN S.A.	Internal standard on ESG risk analysis	Regulates the ESG analysis process adopted by BT Mic
BT Asset Management S.A.I S.A.	Sustainability Policy	Governs ESG aspects applicable at the company level
BT Direct IFN S.A.	Rules of Procedure for the Environmental (ESG) Committee	Regulates the duties of the ESG Committee established at the subsidiary level
BT Leasing	Internal Policy on Environmental and Social Risk Analysis	Regulates the ESG analysis process applicable at the subsidiary level
BT Pensii SAFPF S.A.	Policy on the assessment of good governance practices of investee companies	Regulates the criteria applied regarding the corporate governance practices of investee companies

Scope of application of policies and exclusions

Both the corporate lending policy and the ESG analysis workflow apply to all corporate clients of Banca Transilvania. However, certain categories of financial products, such as financing provided through corporate credit cards, are exempt from the ESG analysis. The ESG Analysis Framework also defines the conditions for ESG approval (exposure value, inherent environmental risks, and other legal criteria, such as the need to obtain an environmental permit to conduct business).

The complex forms contain at least 14 questions covering environmental, social, and governance criteria, which clients are asked to answer. The complexity of the forms is determined by the requested exposure amount and the client's inherent environmental risk. Inherent environmental risk is calculated based on the client's industry sector (NACE code), and for climate risk, the client's geographic location is also taken into account.

The forms are used to collect information on the measures implemented by clients to manage ESG issues, such as pollution and measures implemented to mitigate/reduce it, the recording of penalties, waste and energy resource management, as well as occupational safety and health issues and governance policies implemented. The forms are updated periodically to meet legal requirements and stakeholder expectations.

At the subsidiary level, each entity decides how to implement and apply the ESG risk assessment procedure for its own clients, based on recommendations made by Banca Transilvania's ESG risk analysis department.

BT Mic has also implemented an ESG risk assessment form, applicable in particular to companies with a high environmental risk, through which compliance with legislative regulations such as the existence of an environmental permit and compliance with ISU standards, waste management, climate risk impact, any anti-discrimination policies, and the governance experience of management bodies, is verified. Additionally, Victoria Bank has implemented the ESG Policy and integrated a simplified version of the ESG risk assessment form, while BT Leasing has implemented an internal policy, integrated the list of excluded activities, and developed an ESG scoring sheet to quantify the results of the ESG analysis of clients.

Banca Transilvania's corporate lending policy is approved by the Leaders' Committee, and all departments involved are responsible for implementing and enforcing the policy. The ESG Analysis Workflow is approved by the Executive Director of the Corporate Credit Risk Department, and it is the responsibility of the ESG Risk Analysis Department to ensure its implementation.

The policies, regulations, and internal rules implemented at the level of each subsidiary are reviewed and approved by the boards of directors and the CEOs of the subsidiaries.

Both the Corporate Lending Policy and the ESG Analysis Workflow are based on the recommendations and guidelines of international partners EBRD and IFC, and the ESG

analysis forms are updated in accordance with legislative requirements to facilitate the collection of relevant information.

The ESG policies and procedures implemented and applied at the subsidiaries of the financial group are based on the recommendations of Banca Transilvania, as well as those of international partners. The aim is to align the measures implemented at the Group level as much as possible, to streamline the information collection process and ensure data comparability.

Neither the Policy nor the Flow are intended for public disclosure; they are made available to employees, Group entities, and stakeholders to whom the Bank has a reporting obligation.

Implementation of the policy

Through responses to ESG forms and the results of the ESG analysis, the Bank monitors a range of sustainability factors relevant to clients' risk profiles, including waste management and resource consumption, energy efficiency measures, the environmental impact of activities, employee rights, reporting of workplace accidents, and corporate governance policies.

Thus, based on the responses provided via the forms, each client is assigned an ESG score and an ESG risk level, rated on a scale from very low to very high. The risk opinion is the document containing the ESG risk analyst's final assessment of the client's operations and/or the financed project, as applicable. Depending on the risk opinion, ESG risk analysts may make recommendations for performance improvement.

To reinforce efforts toward conducting a comprehensive and accurate ESG analysis, relevant staff (relationship managers, branch managers, credit and risk analysts) receive regular training on the application of the Credit Policy and the ESG Analysis workflow.

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In 2025, a total of 1,162 employees were trained through the internal course developed for ESG risk analysis of financed clients (84 more than in 2024).

Training for staff in the ESG risk analysis department is conducted annually through various specialized external institutions and organizations. Based on the needs of each risk analyst, optimal training courses and programs have been established to support professional development.

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In 2025, the entire department, along with other relevant functions, participated in the Investment and Development Bank (BID) course on DNSH analysis.

At the BT Group level, each subsidiary determines the training plan and the courses its employees must attend. Banca Transilvania provides training and guidance to its subsidiaries through the ESG Risk Analysis Department, as well as other relevant departments, such as the Green Loans Department.

The Bank also carries out initiatives dedicated to supporting and guiding corporate clients in implementing and maintaining measures to improve ESG performance. To this end, courses and workshops are organized in various locations across the country, promoting topics such as energy efficiency, and clients have the opportunity to connect with specialized companies that can offer them services and solutions tailored to their needs.

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In 2025, two events were organized: Industry in Transition, held in Cluj-Napoca in partnership with Servelect, dedicated to the development and implementation of decarbonization plans and to promoting the importance of industrial decarbonization; and the VSME event for SMEs: Dialogues on Sustainability, Risk, and the Future, which aimed to promote the importance of voluntary sustainability reporting for SME clients.

Effectiveness of Policies

The effectiveness of the policies and procedures applied by the Bank in assessing clients' ESG performance is reflected, among other things, in the evolution of credit risk indicators, particularly in the non-performing loan (NPL) ratio within the corporate client portfolio. Integrating ESG analysis into the risk assessment process contributes to a better understanding of clients' risk profiles and the early identification of potential vulnerabilities.

Climate Risk Analysis

The process of analyzing climate and transition risks begins with determining the level of risk associated with the client's business activities. To determine this risk level, the Bank has developed an internal tool based on historical data available in public databases. Physical climate risks are assessed based on factors such as wind speed, temperature, precipitation, and seismic risk, while climate transition risks are assessed based on CO₂ emissions, as well as legislative, technological, market, and reputational risks. For both types of risks, both the company's operations and the geographic location of the activity or funded project at the county level are taken into account. This allows for the differentiation of two or more companies engaged in the same activity but in different locations. For example, the inherent risk associated with cereal cultivation in Galați County is considered "very high," while for the same activity carried out in Cluj County, the physical climate risk is considered "medium."

The final level of physical and transition climate risk is determined by analyzing the responses clients provide via the ESG risk forms. Four of the five ESG risk assessment forms contain at least one question regarding the activity's exposure to physical and transition climate risks, as well as how the impacts generated by this exposure are managed. Only qualitative information is currently collected, but the process is set to be developed to also allow for the collection of quantitative information.

In the forms used to assess the ESG risk of corporate clients, clients are asked to provide information regarding the impact that physical and transition climate risks may have on their business operations. The forms also include a field for details, where clients can describe the measures implemented to manage these risks. Questions are also included regarding the existence of plans to monitor, reduce, or improve resource consumption, as well as the energy sources used.

For clients engaged in activities with a higher environmental impact, the forms request additional information with a higher level of detail. In addition to the questions mentioned above, the forms include questions regarding the calculation of greenhouse gas emissions, the monitoring of ESG indicators, the preparation of a sustainability report, measures implemented to increase energy efficiency, as well as aspects related to water consumption.

Following the evaluation of the client's response via the form, the ESG risk analyst determines the final physical and transition climate risk by adjusting the implied risk upward or downward.

Banca Transilvania's corporate clients are informed from the early stages of the lending process regarding the non-financial information the bank collects as part of the ESG analysis. This approach allows clients to understand in advance the assessment requirements and the type of information relevant to the sustainability risk analysis.

Currently, no specific sustainability objectives, such as targets for reducing greenhouse gas emissions, are established in our client relationships. However, as part of the ESG analysis process, recommendations may be made to clients regarding the improvement of their sustainability performance, and the potential implementation of these recommendations may be monitored throughout the lending relationship.

Furthermore, in accordance with the Bank's Exclusion List, financing may be denied in situations where a client's business activities fall within sectors excluded from financing. In such cases, the client is promptly informed of the decision to reject the credit application.

The portfolio distribution across each physical and transition climate risk class is presented in the table in the ESG Risk Analysis section of Chapter 3.3. Sustainable Financing.

2.3 Circular Economy

The double materiality analysis conducted at the Banca Transilvania Group level identified the theme of resources and the circular economy (E5) as material from the perspective of indirect impact generated through the loan portfolio. Given that the Group's activities consist primarily of financial services, lending, investments, and fund management, without industrial or production processes involving high resource intensity, the direct impact on resource use and waste generation is limited. Material aspects related to the circular economy are thus manifested in how the financed activities/projects manage resource inputs and generate waste, as well as through the structure of the financing portfolio.

The management of risks and opportunities associated with this theme is integrated into the Group's internal regulatory framework and is carried out through the documents and processes governing lending activities and ESG analysis, namely the Corporate Lending Policy, the ESG analysis workflow, and the internal instruction on sustainable financing

Portfolio-related risks

Risks associated with the circular economy manifest primarily through exposures in the lending portfolio. Inefficient waste management in certain economic sectors can generate environmental risks with the potential to materialize into financial risks for the institution.

These risks may arise particularly in sectors such as agriculture, manufacturing, construction, trade, transportation and storage, as well as real estate transactions, where operational activities may involve the generation and management of significant volumes of waste. Inappropriate practices regarding the handling or disposal of waste, including chemicals, fuels, or waste resulting from construction and demolition, can lead to environmental contamination, inefficient use of resources, and increased greenhouse gas emissions.

These situations may generate additional costs for financed companies associated with regulatory compliance or the remediation of environmental impacts, which may affect financial performance and clients' repayment capacity. For the Group, the materiality of these issues is reflected primarily in credit risks and, to a lesser extent, in reputational risks.

Risk Assessment and Management

The assessment of risks associated with the circular economy is carried out through an integrated analysis of credit risk, operational risk, and reputational risk.

From a credit risk perspective, a sensitivity analysis was applied to the corporate loan portfolio, using assumptions regarding variations in the default rate based on the client's ESG risk profile. More conservative scenarios were used for clients classified in high or very high environmental risk categories. The sectors with more relevant exposures identified in this context include construction, wholesale trade, manufacturing, and agriculture.

The results of the analysis indicate, as of the reporting date, a low level of aggregate risk at the portfolio level. At the same time, the relevance of this issue is monitored in the context of developments in the European and national regulatory framework regarding waste management and resource use. The internal Heat Map Tool used to assess environmental risks at the sectoral level is updated periodically to reflect developments in the environmental regulatory framework.

To manage exposures in the credit portfolio associated with these risks, aspects related to resource use and waste management are integrated into the ESG analysis process applied to financing provided to corporate clients. As part of this process, clients' environmental practices are assessed, including waste management, resource use, and compliance with applicable regulations. The results of the assessment are reflected in the client's ESG risk profile and are integrated into the financing analysis and approval process. Depending on the level of identified risks, the ESG assessment may lead to the establishment of specific financing conditions or additional monitoring requirements. The identification of significant deficiencies regarding compliance with environmental requirements may lead to a re-evaluation of the ESG analysis and a reassessment of the client's risk profile.

Integrating the circular economy into ESG risk analysis

The assessment of aspects related to the circular economy is conducted as part of the ESG analysis process applied to financing granted to corporate clients based on assessment forms. The forms include questions regarding waste management and recovery, the existence of environmental permits, and other specific environmental factors.

At the same time, the Bank monitors developments in the European and national regulatory framework regarding waste management and resource use, including the EU Regulation on packaging and packaging waste and the national recycling targets for the period 2025–2030.

Client risks from the perspective of the circular economy (waste management and recovery, resource use, compliance with packaging regulations) are classified under environmental risk, and the portfolio distribution across each risk class is presented in the table in the ESG Risk Analysis section of Chapter 3.3. Sustainable financing.

Financing Opportunities

The double materiality analysis highlighted the circular economy theme from the perspective of opportunities associated with the financing portfolio, with an estimated materialization horizon primarily in the medium and long term.

The transition to economic models based on resource efficiency, together with the evolution of the European regulatory framework, is generating demand for investments in recycling technologies, material efficiency, and supply chain traceability. Developments in the European regulatory framework on the circular economy, including initiatives such as

the Circular Economy Action Plan, the Ecodesign Regulation for Sustainable Products (ESPR), and the proposed Green Claims Directive, are helping to strengthen requirements regarding product sustainability, the use of recycled materials, and supply chain transparency.

These developments generate investment needs for the modernization of industrial processes and the development of recycling infrastructure, creating financing opportunities for financial institutions that support the transition to the circular economy.

Financing the Circular Economy

At the operational level, financing for projects related to the circular economy is provided through the Special Environmental Financing (FSM) category, as defined in the internal guidelines on sustainable financing. This category includes financing granted for investments that contribute to waste prevention, recycling and material recovery, or increasing resource efficiency in production processes.

In 2025, the volume of special environmental financing granted to companies reached 320.5 million RON, compared to 182.0 million RON in 2024, representing a 76.1% increase. At the portfolio level, the balance of this category of financing reached 269.1 million RON as of December 31, 2025, up 127.9% from the previous year.

During 2025, the Bank financed projects related to the circular economy that primarily focused on the development and modernization of waste recycling and recovery infrastructure, including investments in facilities dedicated to the recycling of plastic, textile, and waste electrical and electronic equipment (WEEE), as well as the modernization of technological capacities for sorting, grinding, and processing recovered materials. Some of these projects received co-financing through the National Recovery and Resilience Plan (PNRR). Additional information on the financed projects and their impact is presented in Chapter 3.3 Sustainable Financing.

Funding in this category contributes to Sustainable Development Goal No. 12 - Responsible Consumption and Production, and is integrated into the Group's strategic objective of granting 5 billion RON in green loans validated according to the CAFI methodology for the period 2025–2027.

Planned Actions

The planned actions related to the circular economy are structured around three main areas.

The first direction aims to improve ESG data collection by updating the forms used in the ESG analysis process. In 2025, a process to revise the ESG analysis forms was initiated. The updated version, applicable starting in 2026, includes additional questions regarding the use of recycled, reused, or certified raw materials.

The second direction focuses on continuing to provide financing under the Special Environmental Financing category, intended for investments that contribute to waste recycling and recovery and to the efficient use of resources.

The third direction focuses on monitoring developments in the European regulatory framework to adapt credit risk assessments for economic sectors exposed to regulatory changes.

Targets

As of the reporting date, the Bank had not established specific quantitative targets regarding the circular economy at the customer portfolio level, primarily due to the limited availability of the granular data needed to define measurable indicators.

However, the Group's ESG strategy for the 2025–2027 period includes the objective of granting 5 billion RON in green loans, within which the Special Environmental Financing category represents a significant component.

As the updated ESG forms will enable the systematic collection of quantitative data on clients' circular economy practices, the Bank intends to develop a framework of indicators and targets specific to this topic.

3. Social Information

3.1 The BT Group Team

Employees are the driving force behind the BT Group's development and performance, serving as a key element of its sustainable growth strategy. In a dynamic financial environment, the Group constantly invests in the professional development, well-being, and diversity of its team, ensuring an inclusive, fair, and motivating work environment. The BT Group's organizational culture is built on principles of collaboration, innovation, and responsibility, promoting both operational excellence and positive employee experience.

The implementation of continuous training programs, well-being initiatives, and human resources policies tailored to the current context actively contributes to strengthening the professional competencies, internal cohesion, and the team's level of engagement in achieving the Group's strategic objectives.

Employee Structure and Characteristics

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In December 2025, BT Group reached a total of 14,379 employees, of whom 72% were female and 28% were male. At the same time, the average number of employees was 14,076.

As of December 31, 2025, the share of employees in the Group entities operating in the Republic of Moldova was approximately 13% of the total number of employees at the Group level.

Total number of employees	2025			2024		
	Women	Men	Total	Women	Men	Total
BT Group	10,393	3,986	14,379	10,676	3,993	14,669
Of which in RO	8,963	3,547	12,510	9,572	3,662	13,234
Of which in MD	1,430	439	1,869	1,104	331	1,435

Type of employees	2025			2024		
	Women	Men	Total	Women	Men	Total
Number of permanent employees	9,704	3,755	13,495	9,837	3,747	13,584
Number of temporary employees	689	231	920	839	246	1,085
Number of employees with non-guaranteed working hours	0	0	0	0	0	0
Number of full-time employees	10,208	3,928	14,136	10,532	3,934	14,466
Number of part-time employees	185	58	243	144	59	203

	Moldova	România	Total Group 2025	Moldova	România	Total Group 2025
Total percentage of employees covered by collective bargaining agreements			96.59%			99.30%
Percentage of own employees covered by collective bargaining agreements, within the coverage rate for countries with a significant level of employment (in the EEA)		99.66%			99.57%	
Percentage of own employees covered by collective bargaining agreements (outside the EEA) by region	75.98%			96.38%		



In 2025, the total number of employees that left the company was 2,219, with the employee turnover rate reaching 15.43% (vs. 12.01% in 2024). The increase of approximately 4 percentage points compared to the previous year is mainly explained by the integration process resulting from the merger with OTP Bank.

In such organizational contexts, turnover is natural and temporary, driven by structural harmonization processes, role overlaps, team realignment, and individual employee decisions following organizational changes. Part of these leaves (829 people) came from the employees integrated following the merger, in the context of operational alignment processes.

Employees' data was calculated based on Group employees' reports exported from the internal systems. No estimates were used, and the number of employees was reported as headcount. The average number of employees was obtained by analyzing staff fluctuations during the reporting period and was calculated as the arithmetic mean of the number of employees at the end of each quarter. Throughout the statement, both the indicator regarding the number of employees at the end of the reporting period and the indicator regarding the average number of employees during the reporting period were used, where the calculation methodology requires it (e.g., staff turnover rate, average number of training hours per employee, etc.).

Material impacts, risks, and opportunities and their interaction with the strategy and business model

The double materiality analysis was conducted across the entire BT Group, and the process of identifying and reporting impacts, risks, and opportunities relevant to human resources aspects covered all Group employees. The information reflects a consolidated perspective on how these aspects influence the Group's strategy and business model.

The impacts identified regarding the Group's own workforce reflect BT Group's commitment to ensuring a safe, fair, and inclusive work environment. Creating secure and attractive jobs, supported by competitive wages, contributes to the economic stability of employees and the development of local communities. In this context, collective bargaining plays an essential role, providing a clear framework for employees' rights and obligations, with a positive impact on the stability and transparency of labor relations.

Another important aspect is the employees' health and safety, supported by access to medical services and benefits designed to provide long-term protection and stability. At the same time, BT Group places special emphasis on training and skills development, supporting the employees' professional growth through dedicated programs, which are essential for adapting to a dynamic business environment. Diversity and inclusion remain priorities in the organizational culture, promoted through policies aimed at offering equal opportunities and a work environment free from harassment or violence. These measures contribute to fostering an environment based on respect and safety, with beneficial effects on employees' well-being and mental health.

At the same time, BT Group is aware that there are also potential negative impacts that require monitoring and proactive measures to minimize them. Wage gaps and unequal opportunities among employees based on gender can create inequities within the organization, affecting motivation and perceptions of internal fairness. Furthermore, violating employees' right to privacy can negatively influence their satisfaction and trust in their relationship with the employer. Through clear policies and concrete actions, the BT Group aims to reduce the effects of these negative impacts and create a balanced, transparent, and fair work environment for all employees.

The identified impacts can also generate material risks for the BT Group, both in terms of its own operations and its relationships with upstream partners. Inadequate training and education processes can leave employees without the skills needed to effectively fulfill their roles, which can lead to decreased productivity, limited innovation, and, consequently, negatively impact the company's financial performance. This risk becomes even more critical in the context of the need to adapt to digitalization and rapid market transformations. In addition, data privacy and cybersecurity risks pose major challenges, and any data breaches could compromise customers' personal information, affecting their trust and financial stability. Cyberattacks also have the potential to disrupt banking operations, which could negatively impact the BT Group's reputation and market position.

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

Investing in employees' health and safety through prevention and wellness programs reduces absenteeism and improves professional engagement, while also strengthening the Bank's image as a responsible employer. Furthermore, BT's commitment to gender equality and fair compensation demonstrates an inclusive approach that encourages diversity and provides equal opportunities to all employees, thereby aligning with the principles of the Diversity Charter.

Facilitating professional training and development represents another important opportunity, supporting the employees' growth and maintaining a highly competent level of skills within the organization. These initiatives, integrated into a coherent Human Resources Strategy, support workforce development and contribute to promoting a sustainable model of growth and innovation within the BT Group.

Material impact on workers that may result from the transition to a green economy

The Group has not identified any material negative impact on its employees as a result of the transition to a green economy. This is due to the implementation of training and upskilling programs that support the workforce's continuous adaptation to changes in the financial and banking sector, particularly those driven by new regulatory requirements regarding sustainability. These initiatives ensure that employees not only maintain their professional relevance but also benefit from development opportunities in emerging fields, such as managing ESG requirements and integrating sustainability principles into lending policies.



Over 8,100 of the Group's employees completed ESG-related trainings in 2025.

As financial institutions adopt more sustainable practices, new professional opportunities are emerging, particularly in areas related to non-financial reporting, analyzing clients' sustainability performance, and implementing the relevant regulatory framework. Rather than leading to job losses, this transition offers prospects for internal mobility, and the development of skills necessary in the context of the legislative changes.

To support these transformations, dedicated professional training programs are being conducted to familiarize employees with new reporting requirements, ESG risk analysis, and the impact of regulations on financial activities. At the same time, educational programs

are organized to raise awareness on sustainability, both among operational staff and the management level. These measures contribute to the effective integration of new compliance requirements, maintaining a stable work environment and providing employees with the tools needed to proactively adapt to industry developments.

Supporting employees exposed to specific risks

BT Group pays special attention to those categories of employees who, due to their role or level of experience, may be more vulnerable to operational pressure or specific occupational risks. The approach is tailored to the context of each role.

For young professionals at the start of their careers, the onboarding period is supported by mentoring programs, in which experienced colleagues provide ongoing guidance in managing complex responsibilities and tasks. At the same time, training sessions are organized to accelerate the development of technical skills and interpersonal abilities, reducing the risk of operational errors and burnout.

Employees who handle cash benefit from a well-structured operational framework with clear protocols for each type of activity, contributing to a safe and predictable environment. Additionally, psychological support is available as needed, and this category of employees receives two extra paid days off. In shopping centers, where the pace of work is intense, training programs tailored to the specific nature of work are implemented, as well as additional financial incentive schemes.

For front-office and call center teams, who may be exposed to stressful situations arising from direct interaction with customers, clear mechanisms for managing difficult cases have been established. Access to psychological support is part of the preventive measures designed to reduce the risk of burnout and support the maintenance of a healthy work-life balance.

Employees Relationship Governance and Policy Framework

Framework Policies

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

The Group's human resources policies apply to all employees, regardless of position or type of work performed, ensuring a unified and equitable framework at the organizational level. In addition, certain specific policies and provisions are dedicated to leadership and top management, given the strategic responsibilities and decision-making authority associated with these roles.

Employees-focused policies form the foundation of the relationship between the company and its team, ensuring a safe, fair, and consistent work environment. These policies are designed to address relevant issues identified in internal analyses, helping to mitigate risks and support the professional and personal development of employees. Through the consistent application of these policies, an organizational environment based on responsibility, respect, and collaboration is fostered, in line with the company's performance objectives and its commitment to its people.

Code of Ethics and Conduct

The Code of Ethics and Conduct establishes the principles governing professional behavior within the company, emphasizing integrity, fairness, and mutual respect. The document explicitly prohibits any form of harassment or discrimination and defines clear expectations regarding conduct in workplace relationships. By applying these principles, a fair and inclusive work environment is fostered, where equal opportunity is guaranteed, and every employee has the opportunity to grow and contribute to the organization's goals.

Remuneration Policy

Within the Group, the Employees Remuneration Policy governs the remuneration principles and serves as the basis for developing remuneration policies across all Group subsidiaries.

The Remuneration Policy is built on the principle of equal treatment, ensuring equal pay for the same work or for work of equal value, regardless of gender. At the same time, it establishes a clear link between remuneration and performance through multi-year

evaluations and the inclusion of non-financial criteria, such as professional development, compliance, and contribution to team performance. Customer interests are also integrated into the evaluation criteria.

The Remuneration Policy is designed to support the sustainable development of the Bank and the Group, in line with the strategic objectives and the principles of prudent risk management. It aims to align the interests of employees and management with those of shareholders and other stakeholders. In this context, the principles underlying the remuneration policy within the BT Financial Group are:

- generating long-term performance;
- attracting and retaining the best professionals;
- rewarding the level of responsibility and professional track record;
- ensuring profitability within the BT Financial Group and its competitiveness;
- ensuring transparency regarding the compensation policy;
- respecting the interests of clients.

The main objectives of the policy are to encourage teamwork and strengthen cooperative relationships among colleagues, ensure a direct correlation between compensation and performance while respecting clients' interests, and attract, retain, and motivate employees in key positions, as defined in *the Policy on the Selection, Monitoring, Assessment and Succession Planning at Banca Transilvania*. At the same time, the policy is designed to be flexible, allowing for rapid adaptation to the Bank's objectives, in full compliance with the applicable legal requirements.

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

Each subsidiary has developed its own employee compensation policy in accordance with applicable laws and regulations, based on the principles defined by the Bank's policy.

Relevant commitments regarding human rights policies

The Group complies with the requirements of the International Labour Organization Conventions ratified by Romania and transposed into the National Labour Code, with the aim of ensuring a fair and equitable work environment based on diversity, inclusion, and equal opportunity.

At the same time, the Bank's policies are aligned with the UN Guiding Principles on Business and Human Rights, including the principles and rights set forth in the eight fundamental conventions identified in the International Labour Organization's Declaration on

Fundamental Principles and Rights at Work and those set forth in the International Bill of Human Rights.

Respect for fundamental rights is established through the internal framework, which clearly regulates the basic principles regarding safe and fair working conditions. The Board of Directors is responsible for approving these policies and ensuring they comply with legal and ethical standards. The Human Resources Department, in coordination with the Nomination Committee and the Remuneration Committee, is responsible for developing, implementing, and updating the policies.

To verify compliance with working conditions, the Internal Audit Department assesses the proper application of the policies. Regarding external audits, local labor authorities are responsible for verifying compliance with applicable legislation.

Employees' fundamental rights are also set forth in the Collective Bargaining Agreement and are established in accordance with European legislation transposed into current national law. This applies to all employees and provides for rights and benefits in addition to those in the Labor Code.

At the same time, to ensure respect for employees' right to work, the Bank has implemented the Code of Ethics and Conduct, which defines the fundamental principles regarding employee behavior and labor relations. Furthermore, the Policy on Promoting Diversity within Banca Transilvania's management body emphasizes the importance of a selection process based on objective criteria and meritocracy, while also ensuring the prevention of discrimination based on criteria such as race, color, gender, national origin, or sexual orientation.

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To uphold human rights and respond appropriately to situations where they are affected, the Bank has implemented a governance framework aligned with the robust principles required by its financing partners (IFC, EBRD), as well as an effective mechanism for identification, monitoring, and remediation.

Whistleblower protection is ensured through the dedicated Whistlelink platform, a confidential and secure channel for reporting irregularities: <https://bancatransilvania.whistlelink.com>. Any retaliation against individuals who report violations is prohibited and subject to disciplinary action. Reports follow a formal process with clear deadlines: initial steps within a maximum of 15 business days at the level of the HR Special Projects & Employee Relations Department, and, if necessary, a decision by the Human Resources Committee within a maximum of 45 days. The parties may be assisted, and serious situations may trigger a disciplinary investigation or confidential mediation.

Wage Adequacy

In both Romania and the Republic of Moldova, the two countries where the BT Group operates, the appropriate minimum wage is regulated by the Labor Code and by Government Decisions.

In Romania, Law 53/2003, as amended and supplemented (the Labor Code), regulates the definition of the minimum wage. Each year, the Government issues a decision establishing this threshold. For the year 2025, the gross minimum wage was set at 4,050 RON by Government Decision No. 1506/2024 (), published in the Official Gazette No. 1185 of November 28, 2024. In addition, Law 283/2024 aligned the Labor Code with Directive (EU) 2022/2041.

In Moldova, the minimum wage threshold for 2025 was set at 5,500 Moldovan RON pursuant to Government Decision No. 846 of December 2024.

The BT Group complies with these regulations and pays all its employees at a level above the minimum established by law.

Remuneration indicators (pay gap and total remuneration)

The gender pay gap was calculated in accordance with ESRS requirements both at the level of BT Group and at the level of Banca Transilvania . The indicator represents the unadjusted ratio determined based on the raw data reported by the entities included in the scope of consolidation. This ratio reflects the difference between the average salary levels of female and male employees, expressed as a percentage of the average salary level of male employees. The methodology used does not include adjustments for factors that may have a statistically significant impact on remuneration levels, such as professional experience, job position, performance, geographic location, or level of education. Therefore, in the absence of these adjustments, the unadjusted gender pay gap has limited relevance, as it is not correlated with the economic and organizational factors listed that can explain wage differences beyond the gender dimension.

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As of December 31, 2025, the unadjusted rate is 24.3% at Banca Transilvania and 24.9% at BT Group, down from December 31, 2024, when it was 25.9% at Banca Transilvania and 25.4% at BT Group.

To more accurately reflect the reality and complexity of the salary structure, Banca Transilvania conducted an in-depth analysis of the pay gap between women and men, both at the individual and consolidated levels. The analysis was based on a regression model that included relevant variables such as job function, experience, education level, location, and other organizational factors, assessing the impact of the gender variable through the corresponding regression coefficient. This approach yields an adjusted result, providing a statistically relevant perspective on pay gaps correlated exclusively with gender. We

believe that conducting such an analysis is essential for a correct and nuanced interpretation of the results and for informing measures that support pay equity, organizational culture, and employee motivation. After adjusting for relevant variables, the adjusted pay gap is 4.5% at both Banca Transilvania and BT Group:

Gender pay gap

Entity	Pay gap unadjusted pay gap		Adjusted adjusted pay gap	
	2025	2024	2025	2024
BT	24.3%	25.9%	4.5%	6.4%
BT Group	24.9%	25.4%	4.5%	6.8%

Note: The conversion from MDL to RON was performed using the exchange rate published by the European Commission, 1 MDL = 0.2580 RON

In the context of ESRS reporting, the total annual pay ratio is a key indicator for assessing pay inequalities and ensuring transparency at the organizational level. It is determined by comparing the total annual remuneration of the highest-paid employee to the median remuneration, calculated for all employees, excluding the remuneration of the highest-paid employee.

The indicator provides a relevant picture of the internal distribution of compensation and supports the assessment of pay equity, serving as an important tool in supporting sustainability strategies and equal opportunity policies.

Total annual remuneration report

Entity	Median		Ratio (according to ESRS)		Ratio (according to ESRS)
	2025	2024	2025	2024	
BT	176,656	157,166	86.55	82.08	5.45%
BT Group	177,161	158,164	86.30	81.57	5.80%

Entities in the Republic of Moldova

For the reports covering the years 2024 and 2025, total compensation was assessed in accordance with the methodology used to determine the gender pay gap, including members with a mandate (excluding members of the Board of Directors).

With regard to the 2025 fiscal year, entities in the Republic of Moldova (BC Victoriabank SA, OCN BT Leasing Moldova SRL, OCN Microinvest SRL) were analyzed separately, given the different legislative framework compared to Romania, as well as specific market practices.

Republic of Moldova – remuneration indicators

Gender pay gap

Country	Unadjusted gender pay gap 2025	Adjusted gender pay gap 2025
Republic of Moldova	37.20%	5.70%

Total annual pay report

Country	Median 2025	Ratio (determined according to ESRS) 2025
Republic of Moldova	64,033	33.61

In contrast to the analysis conducted in 2024, the assessment for this report was carried out taking into account the relevant provisions of the EU Directive 2023/970, which strengthens the application of the principle of equal pay for equal work or work of equal value between women and men, by introducing increased requirements for pay transparency and mechanisms to ensure compliance with the law. This legislative act clarifies a number of methodological and conceptual aspects that support the consistent application of pay equity principles, without taking the age variable into account.

Policies on employees' skills development

Training and professional development are key elements for employees' growth, providing opportunities to strengthen the skills and abilities needed to perform efficient and high-quality work. The Bank's Internal Rules of Procedure govern, among other things, the general framework for professional development.

By participating in training programs, employees can update and expand their knowledge, facilitating adaptation to organizational changes and developments in the external

environment. At the same time, professional training supports the development of innovation capacity and the improvement of individual and team performance.

To support the learning process, specific procedures have been developed, including a procedure regarding remote learning. Furthermore, for employees engaged in activities specific to financial services and operations, the Procedure on the Administration of the Compliance Framework for MiFID II-Relevant Operations at the Bank applies, developed to ensure compliance with the professional training requirements set out in Law No. 126/2018 on markets and financial instruments.

The content of the programs, teaching methods, and their outcomes are evaluated by the BT Academy to ensure alignment with organizational objectives and employees' development needs.

At the subsidiaries level, each entity establishes its own Internal Rules of Procedure, tailored to its specific operational needs and characteristics. Additionally, each subsidiary develops and implements training procedures specific to its field of activity, thereby ensuring compliance with the applicable regulations and the continuous development of the employees' competencies.

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In 2025, the average number of training hours per employee / per year across the BT Group was 55, similar to 2024.

Programs for the professional and personal development of the employees

In 2025, efforts continued to foster a culture based on continuous learning, collaboration, autonomy, and resilience, through the development of programs designed to support performance and continuous adaptation to changes in the banking environment. Key priorities included upskilling employees to understand and use technology tools that leverage artificial intelligence, as well as training managers in the context of the hybrid human-AI work environment.

A record level of participation in learning programs was recorded across the Group, totaling approximately 769,000 training hours, delivered through a combination of formats: in-person sessions, webinars, and e-learning programs. The program portfolio evolved throughout the year to address both immediate operational needs and the medium- and long-term strategic objectives of the bank and its subsidiaries. The training programs aimed to strengthen employees' technical, professional, and behavioral competencies, covering areas such as compliance and regulation (AML/KYC, GDPR, international sanctions, ethics), ESG and sustainability, banking products and services, financial analysis and risk management, IT security and digitalization, project management and leadership, as well as the development of communication, collaboration, and personal efficiency skills.

This approach supported the growth of internal expertise and the alignment of employees' skills with the demands of a constantly evolving financial landscape.

To structure and consistently support the learning process, training programs were organized across two main academies, which addressed distinct development needs and supported employees' career paths based on their role, level of experience, and area of activity.

Leadership and Management Academy

Be the Manager – A program dedicated to entry-level and mid-level managers, focused on strengthening essential management and leadership skills.

Leadership Program – Developed in collaboration with professors from Harvard Business School. This program is designed for senior managers within the BT Group, with the aim of developing strategic leadership skills.

Intelligent Relationships – A program for senior and mid-level managers within the BT Group, designed to improve collaboration and the effectiveness of professional relationships within the organization.

Leadership Journey Program – Dedicated to Headquarters Directors, in collaboration with professors from the prestigious Maastricht EMBA program.

START BT_Leadership in Action – A 6-month program dedicated to preparing successors for Branch Directors.

Sales Academy

Entrepreneurship – A program dedicated to developing an entrepreneurial spirit, based on modern methods, including the Business Model Canvas and GROW, offering participants practical and applied experiences.

SME Business School – A program designed for teams in the SME and microbusiness segments, this program focuses on developing sales skills and identifying customer needs, contributing to the building of sustainable business relationships.

Sales Caravan – A project specifically designed for customer relationship employees, aimed at developing sales skills in a flexible and accessible format, adaptable to local realities (Phone Approach and Consultative Selling).

Individual coaching programs, delivered by internal and external coaches, that support the development of managerial skills and the process of assuming the role of manager.

Alvolution

Alvolution was a special initiative in 2025, aimed at facilitating cultural transformation through artificial intelligence. A bold internal project, launched when AI was just beginning to be widely understood, but one that promises to profoundly transform the way employees work, collaborate, and innovate. Initially developed by HR for implementation within IT teams, it was gradually expanded across the entire organization, targeting how employees work, collaborate, and innovate through the responsible and effective adoption of AI technologies.

Alvolution addressed two business needs: (1) increasing operational efficiency across all areas of activity by reducing the volume of “busy work” and (2) developing employees’ digital skills to support new work models and transformation projects. Among the results measuring the project’s impact:

- Adoption & engagement: over 350+ IT employees participated in more than 60 training sessions during the first phase, strengthening the skill set required for AI-driven digital transformation projects; in total, nearly 6,800 participations in AI-themed programs confirm the interest and relevance of the topic within the organization.
- Individual efficiency: an internal survey shows that 80% of AI users report improved work quality and time savings of 1–2 hours/day, a critical indicator for operational efficiency and availability for high-value-added activities.
- Scaling technology in business: Microsoft 365 Copilot and GitHub Copilot licenses were allocated and integrated into employees’ workflows for the automated generation of documents, analyses, presentations, or code-assisted writing, reducing costs associated with manual effort and raising the quality standard of deliverables.
- Quality of IT deliverables: the use of AI in development (including AI agents for roles such as Analyst, PM, Architect, Developer, and QA) has led to reduced delivery times and a noticeable increase in quality.

Through these results, Alvolution has contributed to both cost efficiency and increased productivity, strengthened the digital culture within BT, and prepared the organization for future technological transformations.

Learn from Home

Intended for employees across the network, this benefit was accessed by 851 colleagues in 2025, the same number as in 2024.

Webinars developed in 2025:

Finance with Meaning – The Fundamentals of Financial Education: This training provides essential concepts for managing personal finances, savings, and financial planning.

Participants prioritize their own financial needs and discover simple, accessible strategies for responsible, long-term management of financial resources.

Finance with a Purpose – First Steps in Investing – The program introduces investment concepts, the benefits of investment funds, and the BTAM offer. Participants analyze financial options such as funds, savings, direct stock investments, and voluntary pensions, with access to real-world examples and simulations.

Gender Equality Policy

Within the Group, the Policy on Equal Opportunities and Treatment between Women and Men, in place since 2020, provides a clear and well-defined framework for promoting a fair and inclusive work environment. It is designed to guide employees in understanding discrimination and harassment, highlighting everyone's responsibilities and the measures available for reporting and resolving any instances of harassment or exclusion. The policy encourages the correction of attitudes and behaviors that may lead to the marginalization of individuals, regardless of gender, and emphasizes the benefits of an organizational culture based on diversity, inclusion, and mutual respect. It also establishes clear provisions for applying the principle of equal opportunity in all aspects of employment, including recruitment, promotion, professional training, working conditions, compensation, and social security.

Issues related to diversity, inclusion, and equal opportunity, which describe the behavior the Bank expects from all its employees, are also included in BT's Internal Rules of Procedure and Code of Ethics and Conduct.

The Policy on Equal Opportunities for Men and Women and the Internal Rules of Procedure clearly define forms of discrimination, both direct and indirect, based on criteria such as gender, sexual orientation, genetic characteristics, age, nationality, race and color, ethnicity, religion, political and social views, disability, and family situation or responsibilities.

To prevent and combat all forms and acts of gender-based harassment and psychological harassment in the workplace, Banca Transilvania commits to:

- to ensure equal opportunities and treatment among employees, women and men, in all types of employment relationships;
- to continuously inform employees of their rights regarding equal opportunities and treatment between women and men in employment relationships, including through training sessions;
- to inform the public authorities responsible for enforcing and monitoring the compliance with the legislation in place on equal opportunities and treatment between women and men;
- prohibit and sanction any actions that may lead to workplace bullying or discrimination based on gender.

At the same time, the Policy on the Selection, Monitoring, Assessment, and Succession Planning at Banca Transilvania establishes how diversity is promoted within Banca Transilvania's governing bodies (the Board of Directors and the Leaders' Committee).

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In 2023, Banca Transilvania signed **the Romanian Diversity Charter**, publicly committing to the European principles on diversity, equal opportunity, and inclusion. In 2024, the bank became a member of the Romanian Diversity Chamber of Commerce, further strengthening its involvement in DEI initiatives within the business community. In 2025, the BT Women's Network was honored at the Romanian Diversity Awards, and the bank made important steps forward on its program to make its' services accessible (both digitally and physically), in line with the European Accessibility Act.

Incidents, complaints, and serious human rights issues

At the Group level, Banca Transilvania recorded 17 reports regarding potential incidents of discrimination, and Salt Bank recorded 1 report. Following investigations, it was found that there were no instances in which the Bank's employees who filed the reports had been subjected to acts of direct or indirect discrimination or harassment by the person they complained about.

Complaints were received through the following channels:

- 17 complaints received via email sent directly to HR;
- 1 complaint via the Whistleblower platform.

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During the reporting period, the Group did not record:

- serious human rights incidents,
- complaints filed with the National Contact Points for Responsible Business Conduct,
- serious human rights issues and incidents related to its own workforce that constitute breaches of the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises,
- fines, penalties, or compensation for damages resulting from violations related to employment-related discrimination and harassment,
- fines, penalties, or compensation for damages resulting from incidents involving human rights violations.

Specific provisions for the inclusion of vulnerable persons

The Internal Rules of Procedure contain clear provisions regarding the protection of breastfeeding mothers, recognizing them as a vulnerable group upon their return to work. Additionally, for employees returning from parental leave, the Bank offers a reduction in working hours for the first four weeks, without affecting their salary rights, thereby facilitating their transition back into the workplace. At the same time, to support vulnerable groups (employees with disabilities), a case-by-case teleworking procedure is applied, offering flexibility in work organization and ensuring an optimal work-life balance. In accordance with the collective bargaining agreement, employees with disabilities are entitled to at least 3 additional working days of paid leave.

Diversity of the BT Group Team

Diversity in Leadership Structures	2025			2024		
	Women	Men	Total	Women	Men	Total
	13	37	50	13	32	45
	26%	74%		29%	71%	

In case of Banca Transilvania, Victoriabank, and Salt Bank, senior management is represented by the members of the Leaders' Committee and the Steering Committee, respectively, and in the case of subsidiaries, by the CEO and Deputy CEO.

Employees diversity by age	2025	2024
Under 30	3,263	3,260
Between 30 and 50	9,404	9,733
Over 50	1,712	1,676
Total	14,379	14,669

Policies on occupational health and safety

At the BT Group level in Romania, matters related to employees occupational health and safety are governed internally by the Guidelines on Occupational Health and Safety (OHS) and Emergency Situations (ES), which are coordinated by the Deputy CEO (COO) through the Physical Security Department – OHS-ES Office. At the level of BT Group companies in

the Republic of Moldova, the occupational health and safety management system is implemented in accordance with applicable legislation.

Hazard identification and risk assessment are conducted at the Bank level for each workplace by the OSH-ES structures (with the option of using authorized external services, as appropriate). The results are incorporated into the Prevention and Protection Plan, which details the assessed occupational risks, technical, hygiene, and organizational measures, as well as the resources required for implementation. The plan may be revised whenever changes in working conditions occur or new risks arise. Employees and designated workers are instructed to immediately report hazards/dangerous situations, including via email to the OHS-SU Office (ssmsu@btrl.ro), following the established procedures for internal reporting and, where applicable, notifying the authorities (ITM/ISU).

Prevention of Workplace Accidents

The Bank has implemented a policy on occupational health and safety, as well as emergency management. This is supported by a management system focused on risk prevention, training and informing workers, as well as investigating and recording incidents, in accordance with the provisions of Government Decision 1425/2006.

The Occupational Health and Safety Committee (OHS Committee) operates at the Bank level to ensure employee involvement in OHS decisions. The committee consists of 8 employee representatives, 8 employer representatives, the occupational physician, the Chair, the Deputy CEO (COO), and the secretary is an employee from the OSH-SU Office. The committee's responsibilities and operations are defined in accordance with the provisions of Government Decision 1425/2006, Article 67, and the Internal Rules of Procedure. The terms of office for employees' representatives are two years, and upon their expiration, a new selection process is organized. The election procedure is governed by the Bank's Internal Rules of Procedure.

At the branch level, a person is designated to be responsible for the prevention and protection regarding occupational health and safety (OHS) and emergency situations (ES), as well as for the training and coordination regarding OHS and ES. The person designated for prevention and protection regarding occupational health and safety (OHS) and emergency situations (ES) implements the instructions received from the Office for Occupational Health and Safety and Emergency Situations and maintains the necessary documentation in accordance with the mandatory list in the Standard.

Introductory, periodic, and supplementary training is conducted online via the SSM.ro Platform, with electronic signatures from the individuals involved and automatic notifications for the completion of the materials; the deadline for completing the periodic training is 10 business days from the notification. Records of the training forms are stored electronically on the platform.

Health and Safety Indicators

At the BT Group level, all employees are covered by the occupational health and safety management system.

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In 2025, similar to 2024, no fatalities were recorded among the Group's own workforce or contractors following workplace accidents or occupational diseases.

In 2025, a total of 4 workplace accidents were recorded in the BT Group. Of these, 3 accidents occurred at the BT subsidiaries in Romania, and 1 accident at a Group entity in the Republic of Moldova. By comparison, a total of 11 workplace accidents were recorded in 2024. Of these, 8 accidents occurred at Banca Transilvania, including 2 minor accidents that did not require the intervention of the Territorial Labor Inspectorate (ITM), while 3 workplace accidents were reported since the acquisition of OTP.

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In 2025, the workplace accident rate recorded for the BT Group is 0.19 per 1,000,000 hours worked (vs. 0.50 in 2024), reflecting a safe working environment and a low number of workplace injuries. This rate is calculated by dividing the total number of reportable accidents by the number of hours worked, with the result then multiplied by 1,000,000. As a result of the 4 workplace accidents, 50 workdays were lost (vs. 177 in 2024).

Employees Well-being Programs

Employees' well-being is a strategic component of Banca Transilvania's development model, integrated into Human Resources management processes and long-term performance objectives. In 2025, investments in health, work-life balance, professional development, and the employees experience continued to support a stable and motivating work environment, where engagement, competence, and trust directly contribute to organizational performance and sustainable financial results.

Thus, long-standing projects with a direct impact on prevention were continued, such as:

- **The "Screening Saves Lives" program**, an initiative for detecting the most common types of cancer, developed and implemented in collaboration with the Regina Maria Clinics Network. All screenings under the program are free of charge. In 2025, 2,940 screening packages were performed, and in cases where cellular changes were detected, prompt treatment saved lives.
- The **voluntary health insurance** available to BT employees who have opted for this benefit covers medical expenses resulting from accidents or illness, surgical procedures, with the additional option of a second medical opinion, as well as

hospitalization and convalescence. By the end of October 2025, the insurance had been used by 2,979 colleagues who filed a total of 5,022 claims.

- The **provision of supplementary medical benefits under a co-payment system** supported 71 complex examinations (MRI and CT) as well as access to physical therapy and physiotherapy services at Kinetic medical clinics.
- **Medical visits** – Medical Advisor at the bank's headquarters.
- **Program for parents returning from parental leave:** the program helps employees gradually reintegrate after an absence of approximately two years. Parents have a flexible schedule during the first month after returning to work. Based on the positive feedback received after launching this program, this approach to a gradual return to work for mothers has been maintained.

Banca Transilvania has strengthened its well-being initiatives by introducing two overarching concepts: #GrijăDeTine and #BineCuTine, which have enabled the unified structuring of initiatives dedicated to physical, emotional, and mental health. The use of these visual tags has helped increase the visibility of the programs among employees, making it easier to quickly navigate the range of internal communication resources available.

#GrijăDeTine – Physical Health, Prevention, and Health Education

Programs and initiatives dedicated to prevention and promotion of a healthy lifestyle were carried out:

- **Health webinars:** online sessions led by medical specialists (dermatology, pediatrics, mental health), which provided practical and accessible information. In 2025, over **650 employees** participated in these sessions.
- Health assessments
 - Specialists from Enayati Medical City conducted physical assessments for **48 employees** in Bucharest.
 - Evista's partners provided medical eye care services (via Diopron) to **over 250 employees** during two dedicated sessions.
- **Blood donation campaigns:** **Four donation sessions** were organized in partnership with the Blood Transfusion Centers in Cluj-Napoca and Bucharest. Approximately **400 employees** participated, of whom **346** actually **donated** blood. The initiative focused on both the volunteer aspect and raising awareness about the importance of donating blood.
- Educational videos and podcasts

Materials were produced and promoted to encourage prevention and the effective use of medical services offered to employees, such as:

- *About the Medical Concierge* – Enayati Medical City

- Second medical opinion
- What the BT subscription includes
- The Enayati Clinic Network
- First aid – recorded webinar
- Premenopause – Educational Webinar
- Carefree Summer – Regina Maria
- Modern Psychology: ADHD, OCD – Regina Maria

#BineCuTine – emotional wellbeing, balance, and lifestyle

Under this pillar, programs were implemented to support emotional, relational, and behavioral well-being, with a direct impact on employees' balance and quality of life.

- Urban Camp – program for employees' children

An internal project dedicated to children aged 7 to 13, hosted at BT's offices. The program included themed workshops led by psychologists, educators, and actors, offering an educational and recreational experience in a safe environment, close to their parents. The initiative helped create a balance between personal and professional life. Over 52 children participated in the dedicated sessions at the headquarters in Bucharest and Cluj.

- Raising awareness of the importance of proper posture at the office & "Wellness moments by 7card"

Internal campaign (via BT HuB) and practical exercise session at the office, led by certified instructors, aimed at preventing physical discomfort associated with office work and promoting daily movement.

- "Let's Work Smart" – campaign for efficiency and prioritization

Organizational education program aimed to optimize work methods, reduce overload, and adopt sustainable practices in managing daily tasks.

- Video resources and podcasts for emotional well-being:

Recorded educational materials focused on emotional and psychological well-being, such as:

- About Psychotherapy – Regina Maria
- The Code of Men's Health: Body, Mind, and Balance
- Understanding and Overcoming the Midlife Crisis
- Therapy and psychological counseling services for issues related to anxiety, stress, etc.
- Over **134 hours of internal psychological counseling**, supporting the 39 colleagues who requested assistance

- A series of articles and tips on psychology, under the [Wellbeing](#) umbrella, accessible on the bank's intranet (BT Hub).

Recruitment Programs

In 2025, the recruitment process aimed to address both current operational needs and long-term stability and performance objectives. In addition to technical competencies, the selection process emphasized skills such as collaboration, autonomy, customer focus, and adaptability, in line with the specific nature of the bank's business. Initiatives to optimize the experience of candidates and new employees continued, as did efforts to streamline the selection and onboarding processes.

At the same time, the first Employer Branding ad was launched, supported by dedicated external campaigns, which contributed to increasing the visibility of the employer brand and strengthening its positioning in the labor market.

The BT Career Plan

The BT Career Plan is designed to provide clarity and transparency regarding promotion and professional development opportunities within the organization. The program is implemented across the BT network and in relevant departments at Headquarters level, and in 2025 it was accessed by approximately 830 employees.

Internship at BT

- Three internship projects funded by the European Social Fund were implemented:
 - **Two internship projects targeting students:** "Good experiences keep us together" and "From the classroom to the Bank – first steps toward discovering your career." In both projects, scheduled to run through 2027, the goal is for **800 students** from economics and technical faculties across the country to complete internships at BT locations.
 - **An internship program for high school students:** "Internships and Training for Valuable Professionals," where, in partnership with the "Costin Kirițescu" Economic High School in Bucharest, **268 students** are completing internships at BT over a three-year period.
- **Programs for students:** Engineering Summer University, in collaboration with the Technical University of Cluj-Napoca, attended by over **100 students interested in technical programs and projects**; Junior Summer University in collaboration with Babeș-Bolyai University, attended by over **100 students interested in the financial and banking sector**; Global Money Week, attended *by 120 middle school students from Cluj-Napoca*; "Școala altfel," attended **by 130 elementary school students**; and an event dedicated to financial education with over **120 high school students**

interested in economic development, all in collaboration with the County School Inspectorate.

- **BT Bridge** is the initiative through which new colleagues from the Headquarters connect with teams across the network to gain firsthand insight into the reality on the ground: the profile of BT customers, service delivery, the product portfolio, daily challenges, and best practices. At the same time, valuable ideas for improvement are gathered, inspired by the experience of colleagues who work directly with customers.
- **BT Loop:** a pilot project aimed at streamlining recruitment and retention processes for entry-level roles in **the Contact Center** and **Front Office**, initially implemented in **Cluj** and **Bucharest**.
- **The project's objective** is for **shortlisted finalists** to gain direct experience in the work environment: to observe daily activities and operations, and to interact with future managers and colleagues. This allows them to form a realistic picture of the activities and responsibilities before being hired.
- **BT First Step:** an annual event that facilitates candidates' first contact with the banking sector, offering access to relevant information, direct interactions with specialists, and practical experience, as well as a clear perspective on available role opportunities within Banca Transilvania (2025 edition participants – over 350).
- **RATIO Academy**, a project developed in partnership with *the Association of Accounting Students* at Babeş-Bolyai University in Cluj-Napoca, the largest educational camp in the field of economics. As part of the initiative, students from across the country participate in CFA-themed workshops and presentations; **over 80 students and high school students** took part in this project.
- **Business Smart School** is a summer school organized by the Association of Economics Students at Babeş-Bolyai University in Cluj-Napoca, which brings together students from all over Romania interested in entrepreneurship; **over 60 pupils and high school students** participated in this program.
- **MindSpark**, a project organized by StudPAC at Babeş-Bolyai University in Cluj-Napoca, is a summer camp for high school and college students interested in marketing, communication, and advertising, attended by **over 30 students and high schoolers**.
- **The Investment Club** within the Faculty of Economics and Business Administration is a community of passionate students interested in exploring the world of finance and investment. **Over 40 students** participated in the event organized by BT, discussing topics in macroeconomics.
- **Mathias Corvinus Collegium Leadership Training** is the largest private institution for youth education and development in Hungary, with extensive programs in Transylvania as well, where **20 students** visited.

Dialogue with the employees through engagement processes

A structured and ongoing dialogue with our own workforce and employees' representatives is essential for understanding our employees' concerns and needs, for making decisions based on internal feedback, and for integrating their perspectives into organizational processes, thereby contributing to the creation of a fair, safe, and high-performing work environment.

Collaboration with employees

At Banca Transilvania, the Regulations on the Organization and Functioning of the Employees' Representatives define the structure of the employees' representatives and, at the same time, facilitate social dialogue between the employer and employees through these representatives. Drafted in accordance with applicable legislation, the Regulations aim to formalize the rights and obligations of elected and specially mandated employees' representatives, whose mission is to defend and protect the interests of employees.

For the Bank and its subsidiaries in Romania, the employees' representatives are elected at the General Meeting of Employees, with the vote of at least half plus one of the total number of employees. The term of office for the employees' representatives may not exceed 2 years. Any employee of Banca Transilvania with a permanent employment contract, who has been with the company for at least 12 months prior to the date set for the elections and who is not among the company's legal representatives, may run for the role of Employees' Representative, and the candidacy must be submitted in person.

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The most recent employees' representatives elections at Banca Transilvania took place in 2025 and involved voluntary, open candidacies. The employees' representatives were appointed following the votes casted from approximately 6,100 colleagues. 7 candidates were elected as Employees' Representatives.

Employees' representatives serve as the interface between the bank and the workforce and are highly involved in the Bank's decision-making process. The role of employees' representatives is to collaborate with the Bank to identify and implement those solutions that benefit the workforce; consequently, an employee representative is always invited to attend Human Resources Committee meetings.

Among their responsibilities, the employees' representatives are tasked with handling collective bargaining negotiations, ensuring respect for the employees' rights, and defending employees' interests regarding wages, working conditions, working hours, workplace safety, and other professional, economic, and social aspects related to labor relations. They also participate in the formulation of Internal Rules of Procedure. Furthermore, they play a crucial role in consolidating colleagues' proposals and engaging in negotiations with management representatives.

Individuals working within BT Group under mandate contracts are not covered by the Collective Bargaining Agreement.

BT Employee Experience Index

Fostering an organizational environment based on collaboration, respect, and accountability is a strategic priority for BT Group. The goal is to support effective cooperation among employees to achieve shared objectives, encourage engagement in their own professional development, and maintain a work environment characterized by strong professional relationships and genuine opportunities for growth.

For the ninth consecutive year, **the BT Employee Experience Index (BT EEI)** was conducted, an internal survey designed to measure perceptions of the work environment and understand how to improve the day-to-day experience of employees across BT Group companies. The BT Employee Experience Index (BT EEI) is conducted twice a year and has the following main objectives:

- measuring the Employer Net Promoter Score (eNPS);
- measuring the quality of interaction between managers and the team members they lead;
- assessing the extent to which Banca Transilvania's strategy is known to the entire bank team;
- collecting suggestions and recommendations that can increase employees' satisfaction;
- measuring the quality of collaboration with colleagues in other departments, based on frequent professional interactions;
- assessing the level of collaboration with departments within the organization, based on interactions throughout the year.

In the Summer 2025 edition, a new framework for measuring organizational climate was introduced, focused on dimensions with a direct impact on eNPS and employees' motivation. These dimensions are monitored annually to understand what matters most to employees, followed by the definition of concrete actions at both the organizational and team levels to continuously improve employees' experiences within the BT Group.

In the summer edition of the internal BT Employees Experience Index survey, colleagues perceived as models of collaboration, support, and professionalism were recognized based on employee feedback. The study also analyzed the divisions or departments with which employees frequently interact in their daily work, highlighting those units appreciated for their promptness and efficiency in resolving requests.

The participation rate of employees in the BT Group was 85% in the survey conducted between July and August 2025 (compared to 89% in the January-February edition), with over 9,490 responses (vs. 9,213 in January-February) that were analyzed and used to inform a series of decisions aimed at improving the organizational climate.

The results obtained through the BT Employee Experience Index (BT EEI) provided a clear perspective on the employees' expectations and needs, allowing for the adjustment of motivation and retention strategies. Thus, in 2025, Banca Transilvania implemented a series of measures aimed at improving the employees' experience, both in terms of financial benefits and in terms of flexibility and pay equity.

- Indexing the salaries of all employees to the inflation rate for 2024, effective as of February 1, 2025;
- Maintaining the hybrid work schedule, offering the option to work from home 10 days per month for employees in less critical roles.

Mechanisms for reporting and processes for resolving employees concerns

Currently, to manage the potential negative effects generated by gender pay gaps, the company applies a formal methodology for calculating the pay gap. The methodology describes the steps necessary to analyze whether there are pay differences between female and male employees for the same work or for work of equal value, as well as to determine the extent of these differences.

The objective is to identify and quantify the factors contributing to any pay differences. In cases where the pay gap between male and female employees, for each category established internally, exceeds 9% and cannot be justified by objective and gender-neutral criteria, the underlying causes of this difference are analyzed, and measures to reduce it are established within a reasonable timeframe, so as to avoid further imbalances, including with regard to financial and prudential indicators.

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

Furthermore, to mitigate other forms of negative impact on employees, the company implements essential support measures. Thus, access to psychological counseling is provided for employees affected by burnout, a service that allows them to receive professional support to overcome difficult periods. Additionally, supplementary training sessions are organized, focused on stress management and handling difficult interactions with customers, essential aspects for reducing daily pressure and improving professional relationships. Workload is managed through the balanced redistribution of tasks among employees and, where necessary, by supplementing human resources, with the aim of preventing team overload. At the same time, we aim to optimize processes by digitizing repetitive or administrative activities, some of which are automated through dedicated technological solutions. These measures help reduce operational pressure, streamline operations, and maintain a sustainable work environment that supports employee performance and well-being.

Specific channels for collecting employee feedback

At the Group level, there are clear and accessible channels for reporting concerns and complaints. These mechanisms allow for the identification and resolution of issues in an efficient manner, contributing to the continuous improvement of processes and the maintenance of a fair work environment. Employees have the right to report any treatment deemed discriminatory or behavior that may constitute harassment. In the event of a report, in addition to the complaint filed, the employee may submit multiple pieces of evidence to substantiate the allegations.

Banca Transilvania offers several options for reporting cases deemed to be harassment or discrimination:

- Direct report to the immediate supervisor. If the issue is not resolved at this level, the report is formally escalated to the HR Special Projects & Employee Relations Department, which initiates resolution steps within a maximum of 15 business days.
- Direct report to the HR & Special Projects and Employees Relations Department. The department provides guidance and manages the case procedurally. If necessary, the report is forwarded to the Human Resources Committee, with a decision within 45 business days at the latest.
- Confidential reporting via the dedicated Whistlelink platform:
<https://bancatransilvania.whistlelink.com> – a secure channel, recommended when there are concerns about possible repercussions.

For more complex issues or those requiring an official approach, there are well-defined formal mechanisms that follow specific steps: filing a written complaint, case report, investigation, and resolution of the complaint.

To conduct detailed and objective investigations, a Preliminary Disciplinary Investigation Committee is established, consisting of at least 3 voting members who are impartial and objective. When appointing the committee responsible for receiving and resolving harassment cases, the following criteria are taken into account: gender balance, specifically equal representation of women and men, as well as the ethical and professional conduct of the individuals designated to serve on the committee that will analyze the harassment case. The investigation committee may not include persons directly or indirectly involved in the reported events. The outcome of the investigation is recorded in the minutes of the designated committee and submitted to the competent decision-making body, which determines whether or not sanctions are warranted. Based on this decision, the authorized human resources department issues, if applicable, the disciplinary decision within 30 calendar days of the minutes being recorded (but no later than 6 months from the date of the incident), and the employee is notified within 5 calendar days of issuance. If no sanction is imposed, the decision includes appropriate provisions.

Group employees may also submit reports through external channels under the conditions provided by law. In this case, reports are submitted using the channels made available to

them by the competent authorities responsible for receiving such reports and taking subsequent action (e.g., the National Bank of Romania, the Financial Supervisory Authority, the National Integrity Agency).

Currently, the Group does not conduct a formal process to assess employees' level of trust in these structures and processes as a means of expressing their concerns or needs. The implementation of a dedicated mechanism to measure the perception and degree of these channels usage is being considered as part of future processes to strengthen internal governance practices.

Existing reporting mechanisms are communicated via the intranet, internal policies, and ad hoc notifications to ensure an adequate level of information and accessibility for employees.

The BT Group's subsidiaries have implemented specific measures to ensure a work environment based on equal opportunity and free from harassment. The Internal Order Regulation for each subsidiary include a chapter dedicated to the equal opportunity and anti-harassment policy. Additionally, each subsidiary either has its own reporting channel or has access to the Bank's "Whistlelink" and "My Alert" channels.

In light of specific legal regulations, reports received directly from employees of the subsidiaries BT Asset Management SAI and BT Capital Partners or from other individuals, regarding violations of the law within the aforementioned entities, are redirected to their respective reporting channels, namely MyAlertBTAM@btam.ro and myalert@btcapitalpartners.ro, to be handled in accordance with the applicable Internal Rules of Procedure.

Protection Against Retaliation

The policy on protection against retaliation for individuals using the reporting channels is included in the internal reporting procedure and complies with applicable law. In this regard, throughout the reporting procedure, as well as after its resolution, any form of retaliation, threats of retaliation, or attempts at retaliation against individuals who have filed a report is strictly prohibited, in accordance with the provisions of Law No. 361/2022. The Group is committed to protecting the integrity and rights of all individuals who raise concerns or needs through these channels, ensuring a safe and fair environment for them to express themselves.

Employee-focused initiatives and monitoring of their outcomes

Managing the impact on employees: action plans and mitigation measures

The Group systematically analyzes issues relevant to its workforce, including working conditions, health and safety, pay equity, and discrimination prevention, using internal tools such as surveys, audits, and reporting mechanisms. Based on the findings, improvement measures are adopted, aimed at optimizing working conditions, updating pay policies, and strengthening employees' reporting and protection channels. The progress of these initiatives is tracked through performance indicators, internal feedback, and periodic assessments, providing insight into the effectiveness of the implemented measures and the level of employees' satisfaction.

Responsibility toward employees entails a constant assessment of how the organization's activities influence their work environment and professional experience. Addressing and managing challenges arising in the relationship with the BT Group team takes the form of actions designed to support well-being, professional development, and a balanced work environment for all team members:

- **Salary adjustments in line with inflation:** In February 2025, BT implemented a significant measure to ensure the financial well-being of its employees by indexing salaries in accordance with the inflation rate for 2024.
- **Investments in non-salary benefits:** BT recognizes the importance of a comprehensive benefits package for employees, including not only salaries but also private health insurance and voluntary pensions.
- **Workplace safety and well-being:** BT places a strong emphasis on reducing the risk of accidents by implementing comprehensive safety and well-being programs. A notable example is the wellbeing program, which focuses on mental and physical health prevention and was developed based on a detailed report identifying specific risk factors according to gender, age, and prevalent medical conditions.
- **Stress and burnout prevention:** Balancing workloads and providing psychological support are priorities for BT, which recognizes the negative impact of stress, and burnout on employees' productivity and satisfaction. Support programs are designed to provide employees with the resources needed to effectively manage daily pressures.
- **Career Continuity and Development Plans:** Reducing staff turnover and fostering continuous employees' development are essential for BT. Development programs, such as "Be the Manager" and the "Leadership Program," provide managers with the tools needed to excel in their roles, contributing to the creation of a strong organizational culture and a solid talent base.
- **Skill development through continuous education:** BT invests in the continuous training of employees through courses, workshops, and access to online learning

platforms. Initiatives such as “Școala Altfel” at BT underscore the company’s commitment to financial education, extending it to the community as well.

- **Internal mobility programs:** The BT Career Plan and initiatives such as BT Bridge are designed to offer employees opportunities to explore new roles and responsibilities, promoting a culture of internal growth and professional satisfaction.
- **Process automation and digitization:** Efforts to automate and digitize processes are crucial for BT, allowing employees to focus on value-added tasks and improve operational efficiency.

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

Management of Labor-Related Risks and Opportunities at Banca Transilvania

Within BT Group, the management of relevant workforce-related risks contributes to maintaining operational continuity and efficiency. In this context, actions aimed at mitigating risks related to skills, training, and professional development are constantly implemented.

The Group supports the continuous development of employees through training programs designed to strengthen the skills needed to adapt to new technologies and processes, as well as through sessions dedicated to developing technical and leadership skills, with the aim of ensuring a prepared and flexible team.

These initiatives help maintain a high level of operational performance and the organization’s ability to respond effectively to changes in the business environment, reducing risks associated with workforce dependency.

To capitalize on opportunities for growth and innovation, the Group implements extensive professional development programs, which include specialized training, mentoring, as well as upskilling and reskilling initiatives tailored to market needs. Competitive benefits packages are also offered, designed to support employees’ well-being and motivation. In parallel, organizational development initiatives are underway, aimed at optimizing internal processes and strengthening an organizational culture based on collaboration, performance, and innovation.

Resources Allocated for the Employees Development

The Group allocates a significant annual budget to the Human Resources function to implement measures aimed at sustaining the positive outcomes for employees and mitigating any negative effects arising from material impacts. The related expenses are reflected in the 2025 Financial Statements, in the Consolidated Income Statement under “Personnel Expenses”, representing approximately 43% of total consolidated operating expenses.

Targets and commitments

The Group aims to strengthen workforce stability and development through clear objectives regarding recruitment, retention, training, and diversity. The main priorities focus on diversifying recruitment, reducing turnover in critical roles, developing skills, promoting a fair work environment, and monitoring organizational balance.

Progress toward these objectives is continuously monitored using specific key performance indicators (KPIs):

- An eNPS of at least 50 and a rate of participation in training programs of at least 70% – for 2025 the eNPS was 59 correlated with a participation rate in the survey conducted between July and August 2025 of 85% (89% in the January–February 2025 edition), with over 9,490 responses (9,213 in January–February), confirming the employees’ interest in professional development programs.
- A minimum of 40 hours of training per year per employee, excluding on-the-job training – the target was exceeded, with the annual average reaching 55 hours of training per employee, reflecting the consistent investment in professional skills development.
- Involvement of at least 70 students in internship programs – the target was met, with over 300 students participating in internship programs, benefiting from practical experience and mentoring from the bank’s teams.
- Conducting volunteer activities and CSR initiatives – throughout the year, volunteer programs and social responsibility initiatives were continued and expanded, with employees participating in numerous community, educational, and social activities held nationwide.
- Monitoring gender balance, age, and diversity at the organizational level – the bank continued to monitor diversity indicators and promoted an inclusive work environment through internal initiatives and human resources processes that support gender balance, generational diversity, and equal opportunities.

The setting and adjustment of objectives are based on the results of internal surveys, periodic assessments, consultations with the employees' representatives, and comparative analysis with industry practices, as well as an annual review based on performance and market conditions.

3.2 Customers and users of the BT Group's products and services

Significant impacts, risks, and opportunities and their connection to the strategy, business model, and customer and end-user segments

The Group's business model is based on providing financial products and services to consumers and end users, individual and corporate customers, and their needs directly influence the strategy, operational structure, portfolio development, and service delivery.

Individuals who use the Group's services and products, such as checking and savings accounts, deposits, consumer loans, and mortgages, as well as savings and investment instruments, represent a significant segment of the portfolio. These services enable them to save, invest, or access financing for home purchases, thereby contributing to their financial stability and security. Their characteristics and expectations are integrated into the development process of financial products, digital platforms, and interaction channels.

The corporate client segment complements the Group's portfolio through a diverse range of financial products and services, including financing solutions, cash management, and trading. Special attention is also given to small and medium-sized enterprises, which use the Bank's services for financing, consulting, and risk management solutions, thereby contributing to local economic growth and supporting access to financing and development for this category of clients.

Activities dedicated to corporate clients are organized into four business lines: large corporate, mid-corporate (Mid-Co), SMEs, and microenterprises (micro). Large corporate and Mid-Co clients include large companies that use the Bank's financial products to manage their cash flows, access financing to expand their business, or invest in new growth opportunities. By offering tailored financial solutions, the Bank supports the development and consolidation of economic activities at the corporate level.

SME and micro customers represent a strategic segment, playing an essential role in the local and global economy. They require flexible financial solutions, such as working capital loans, lines of credit, equipment financing, or real estate loans for the purchase of commercial spaces. By ensuring access to financing and promoting financial inclusion, the Bank contributes to the growth and sustainability of these businesses, facilitating the development of the entrepreneurial environment.

Transparency and clarity in the contractual terms and conditions of the Group's products and services are essential to our relationship with customers, helping them to correctly understand the associated features, costs, and risks. Accessible and comprehensive communication supports informed and responsible financial decision-making. In this context, special attention is given to certain categories of customers who may be more financially vulnerable. These include low-income individuals, retirees, young people with no financial experience, the rural population, or those at risk of financial exclusion. These groups may face difficulties in understanding more complex financial products or managing

their financial obligations, which can increase the risk of over-indebtedness or making unfavorable financial decisions.

To mitigate these risks, the Bank employs mechanisms such as promoting financial education, enhancing the transparency of the information provided, and complying with the applicable regulatory framework, ensuring fair, responsible, and tailored interactions with vulnerable customers.

Material adverse effects on customers

Among the financial products and services offered by BT Group entities that may have negative effects on customers are variable-rate loans, which can become more expensive in the context of market fluctuations, as well as high-risk investment products, which can lead to financial losses. Furthermore, certain more complex financial products require an adequate level of understanding on the part of users. In the absence of proper information and assessment, some credit products can lead to over-indebtedness or repayment difficulties, particularly during periods of economic instability.

Thus, transparency regarding information on financial products and services is an essential element in the relationship with customers. Total costs, fees, and associated risks are presented in clear and accessible language so that customers can make informed financial decisions and avoid taking on obligations they do not fully understand.

In providing its services, the Bank processes financial data and personal information, which may give rise to risks related to data privacy and security. Unauthorized access, misuse of information, or cyber attacks can affect customers' financial security and their level of trust in the services provided. To mitigate these risks, technical and organizational cybersecurity measures are implemented, along with clear data protection policies.

Activities with a positive impact on BT Group customers

The Group plays an important role in the Romanian economy through its financing activities for individuals and companies. Through loans provided to entrepreneurs, SMEs, large companies, and the general public, the Bank contributes to supporting investment, consumption, and business development, and through financing programs tailored to the diverse needs of customers and strategic partnerships, it plays an active role in stimulating investment, innovation, and financial inclusion, thereby strengthening the resilience and competitiveness of the national economy.

At the same time, the Group promotes inclusive financial products, such as fee-free bank accounts for low-income individuals or financing solutions for early-stage entrepreneurs, thereby facilitating access to financial services for groups that may face barriers in their relationship with the banking system. Financial education is a complementary component, through programs dedicated to personal budget management, preventing over-indebtedness, and understanding financial products.

The Group also supports SMEs through financial solutions tailored to their needs and develops products with a sustainability component, including green loans designed to finance projects with environmental benefits.

Material risks and opportunities

Insufficient access to clear information or to appropriate financial products and services may affect customer relationships and the performance of the loan portfolio. When the costs, terms, and risks associated with products are not communicated in an easily understandable manner, customers may make inappropriate financial decisions, which can lead to repayment difficulties and a deterioration in the quality of the loan portfolio, negatively impacting the Group's profitability.

Furthermore, financial or digital barriers may limit access to banking services for certain groups of people, particularly in rural areas or among those with limited digital skills. Such situations can lead to dissatisfaction and affect customer trust, increasing the number of complaints, with potential reputational consequences for the Group.

To mitigate these risks, the Group offers financial education programs, invests in digitalization and interactive platforms, and uses clear language in contractual communications. At the same time, the development of mobile applications and flexible financial products helps attract new customers and increase service usage.

No material risks or opportunities have been identified that distinctly affect certain consumer groups. However, vulnerabilities are recognized among older adults, who may face difficulties using digital channels, and among young people with limited financial experience, who are at risk of over-indebtedness. For these segments, the Group develops tailored products and solutions, including financing with flexible terms or programs dedicated to specific customer categories.

Policies Regarding Consumers and End Users

Policies for managing material impacts, risks, and opportunities related to consumers and end users

Policies regarding the protection of consumers and end users are structured around four main areas, each designed to ensure a regulated and effective framework for customer safety and rights, as well as for the smooth conduct of banking activities.

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

Depending on the regulated area, all documents and internal frameworks applicable to consumers and end-users may be valid at both the Bank and Group levels, having been approved by the CEO or the responsible department heads. These policies are accessible to employees via the Bank's intranet and are published on the official website. For Group's subsidiaries, these documents are published on their platforms.

Pillar I: Lending

The first area is lending, where customers are protected by the General Terms and Conditions, applicable to both individuals and legal entities. This document establishes the general framework of the relationship between the Bank and its customers and includes information regarding the products and services offered, associated costs, as well as the rights and obligations of the parties, ensuring transparency and compliance with the applicable regulations.

The lending process is governed by internal procedures tailored to different customer segments (e.g., Internal Lending Policy for Individuals, Lending Procedure for Corporate Clients, etc.), which establish eligibility criteria, lending conditions, and control mechanisms to ensure a responsible and consistent lending process.

Pillar II: Cybersecurity

The second area of focus concerns information security, a critical domain for protecting the Bank's operations, employees, and customers. To this end, the Bank has implemented a framework comprising 28 internal rules that establish organizational and technical requirements to ensure a secure operating environment. These define the objectives, principles, roles, and responsibilities in accordance with applicable external regulations.

Through this framework, the Bank aims to prevent incidents that could affect the confidentiality, integrity, and availability of data, thereby contributing to strengthening operational resilience and maintaining customer trust.

For further details, see section 3.6 Cybersecurity and Personal Data Protection.

Pillar III: Responsible Marketing Practices

The third area of focus concerns ensuring access to clear information and promoting responsible marketing practices, which are essential for maintaining a relationship based on trust with the BT customers. To this end, the Bank implements measures and procedures to continuously assess customers' experience and satisfaction levels regarding the offered products and services.

A central tool in this effort is the procedure for measuring customer perception of service quality, which establishes methods for collecting and analyzing feedback. Through this process, both the quality of products and services and the interactions between customers and employees are evaluated. Analysis of the results allows for the identification of areas for improvement and the adoption of measures to continuously optimize our customers' experience.

Pillar IV: Confidentiality

The fourth relevant area at the level of BT Group concerns compliance with legislation on the protection of personal data. In accordance with the General Data Protection Regulation and the applicable legislative framework, the Bank and the Group entities have implemented Internal Rules of Procedure and control mechanisms that ensure compliance with legal obligations and the adequate protection of processed data.

Personal data protection is an essential element of financial and banking activities, given that such data includes confidential information subject to professional secrecy. The measures adopted are complemented by the Bank's cybersecurity framework, which helps prevent unauthorized access, loss, or misuse of data.

For further details, please refer to Section 3.6 Cybersecurity and Personal Data Protection.

International Standards and Regulations Implemented by the Bank for Customer Safety

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

1. MiFID II – Investor Protection and Financial Market Transparency

BT operates in accordance with the Markets in Financial Instruments Directive (MiFID II), a key European legal framework related to investors' protection and an increased transparency of financial markets. MiFID II regulates investment and trading services, with the following main objectives: investors' protection, improving market transparency, and

ensuring fair and ethical practices in the interaction between financial institutions and clients. In its operations, the Bank complies with MiFID II requirements, guaranteeing its clients secure, transparent financial services that meet the highest standards of investors' protection.

2. PSD2 – Enhanced Security and Innovation in Digital Payments

BT strictly applies the Payment Services Directive (PSD2), which redefines the standards in the field of electronic payments and banking transactions' security. This regulation improves consumer safety and promotes innovation in the financial sector. The bank has integrated PSD2 requirements into its digital platforms, ensuring customers secure, fast transactions that comply with the European regulations.

3. EBA Guidelines – Stability and Security in the European Banking Sector

The European Banking Authority (EBA) imposes a set of mandatory guidelines for all financial institutions in the EU, ensuring their stability, security, and resilience. BT complies with the EBA Guidelines, applying rigorous risk management measures in the areas of cybersecurity and data protection, as well as high standards of ethics and compliance, designed to protect the consumers' interests. By directly applying these principles, BT protects its customers against financial and cyber risks, thereby strengthening trust in banking services.

4. DORA – Operational Resilience in the Digital Age

The Digital Operational Resilience Act (DORA) is a key regulation for strengthening the operational resilience of financial institutions in Europe.

5. Principles for Responsible Banking – Sustainability and Ethics in the Banking Sector

BT is committed to adhering to **the Principles for Responsible Banking (PRB)** to align the banking sector with **sustainable development goals**. To this end, BT:

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

6. CRR/CRD – Prudential Requirements and Risk Management

The Capital Requirements Regulation (CRR) and the Capital Requirements Directive (CRD) form the cornerstone of the banking supervision framework in the European Union. Banca Transilvania complies with the provisions of the CRR/CRD, ensuring that adequate levels of own funds are maintained to cover significant risks, and managing credit risk, market risk, operational risk, and interest rate risk, in accordance with the relevant CRR articles and the implementation of CRR3/CRD VI requirements, including the incorporation of ESG risks into the prudential framework, in line with the new European mandates on sustainability. This

framework strengthens the institution's financial stability and protects customers by maintaining a solid capital level through proactive risk management.

7. BRRD – The European Bank Recovery and Resolution Framework

BT applies the provisions of the Bank Recovery and Resolution Directive (BRRD), which are essential for protecting depositors and ensuring the continuity of banking services in severe situations. The alignment with BRRD requirements includes: clear mechanisms for the conversion or write-down of capital instruments in the event of resolution, and the harmonization of procedures with national legislation transposing the BRRD. By implementing the BRRD, BT contributes to maintaining confidence in the financial system and protecting customers' interests under stress conditions.

8. Pillar III – Transparency and Disclosure of Prudential Information

The Group periodically publishes comprehensive information regarding its risks, capital, and prudential profile, ensuring maximum transparency for investors and consumers. Pillar III reporting is carried out in accordance with: Reg. (EU) 2021/637, which establishes the format and content of financial institutions' disclosures; CRR requirements regarding credit risk adjustments, exposures, capital, and indicators (Art. 435–448); and applicable EBA updates. The consistent application of these requirements contributes to increased transparency and confidence in the bank's operations.

9. EBA Guidelines on ESG Risk Management – Integrated ESG Risk Management

The Bank applies the European guidelines on ESG risk management developed by the EBA, which include requirements regarding:

- the integration of environmental, social, and governance risks into the overall risk framework;
- assessing short-, medium-, and long-term risks, including in the context of the energy transition;
- participation in the climate scenario analysis coordinated by the EBA, as part of the European Fit for 55 exercise, in which Banca Transilvania was the only Romanian institution included in the analyzed sample.

The implementation of these guidelines supports the Bank's alignment with European sustainability standards and contributes to protecting customers through robust management of emerging risks.

Engagement and consultation with consumers and end-users

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

At the Bank level, to maintain a constant dialogue with customers, several feedback collection mechanisms are used. These include the Net Promoter Score, based on responses from customers who have interacted with the Bank's branches, as well as indicators that assess the quality of interaction between customers and Bank representatives.

Customers can submit suggestions and complaints through various channels, including mobile apps, [the website](#), physical branches, social media, and the Call Center.

The Bank also analyzes data on product usage and complaints received to identify potential issues and continuously improve the products and services it offers.

Measures implemented to address or mitigate negative impacts on human rights regarding customers

To prevent and address any negative effects on the rights of consumers and end-users, measures are implemented to ensure transparency, customer protection, and the efficient resolution of issues that arise.

In the event of complaints regarding lending practices, fees, contract terms, the provision of information, access to services, or data protection, customers have access to dedicated mechanisms, including call center support services and official digital channels for submitting requests and complaints. At the same time, there is ongoing collaboration with relevant authorities and mechanisms, such as the National Authority for Consumer Protection, the Center for Alternative Disputes Resolution in the Banking Sector, the National Bank of Romania, the National Supervisory Authority for Personal Data Processing, as well as with courts and mediation mechanisms, to ensure compliance and the fair resolution of any disputes.

Given the specific nature of banking activities, the prevention of risks associated with human rights violations is supported by compliance policies, governance mechanisms, and appropriate due diligence processes.

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During the reporting period, no cases of human rights violations were identified in relation to customers or in relation to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises, to the extent that these are relevant to the business conducted.

Mechanisms for Engaging Consumers and End Users in Impact Management

To assess how its products and services are perceived, the Bank collaborates with customers through regular consultations and analyses conducted with the support of external consultants. Independent studies are used to measure customer satisfaction and

customer experience. The results of these analyses allow for a comparison of satisfaction levels with the market average and provide insight into the Bank’s positioning relative to other industry participants.

In the retail segment, the Bank ranks first among traditional banks, maintaining the upward trend of the past three years. In 2025, Banca Transilvania also took the topped the Romanian banking market in terms of customer satisfaction. Studies show that, at the market level, the most appreciated aspects are the products and services offered, followed by the interaction with employees and a focus on customer needs. In case of BT, customers place particular importance on product quality, staff professionalism, and infrastructure, aspects that positively distinguish the Bank from the market average. These results are used to adjust strategies and continuously improve our customers’ experience.

In the corporate segment, the Bank ranks second, with an NPS score of 52, compared to 53 for the top-ranked institution. Similar to the retail segment, customers primarily value the products and services, the interaction with employees, and the ability to meet their needs. Regarding digital applications, nearly half of respondents believe they’ve already met their needs and expectations, and suggestions focus on expanding functionality and simplifying usage.

In addition, the Bank collaborates with relevant organizations and institutions to strengthen consumer protection and improve access to financial services. These include the Romanian Banking Association, within the framework of initiatives dedicated to financial inclusion and education, as well as financial regulatory and supervisory authorities.

Through these collaborations, the Bank contributes to initiatives and consultations aimed at increasing the transparency and security of banking services.

Aspect	Description	
Stage of collaboration	Collaboration with consumers and end-users takes place throughout the process of developing and optimizing financial products and services. This includes identifying customer needs and expectations, testing and validating financial solutions, and implementing and improving them based on feedback received.	
Type of collaboration	Periodic satisfaction surveys	quarterly/annually
	Focus groups with different consumer segments.	Periodically, upon the launch of a new product
	Independent market research conducted by external consultants.	Periodically

	Collaboration with regulatory authorities and independent consumer protection organizations.	Periodically
Results and impact	We analyze customer satisfaction and compare it to market benchmarks. We measure perceptions of collaboration with BT and the macroeconomic context.	
Responsible function	The Customer Experience & NPS Department, which ensures the implementation of initiatives to improve customer experience The Complaints Department ensures the timely resolution of complaints and reports received from customers.	
Engagement effectiveness	Net Promoter Score (NPS), measures customer loyalty and the likelihood of recommending the Bank to others.	
	Customer Effort Score (CES) reflects the effort perceived by customers in their interactions with the Bank.	
	Human Interaction assesses the quality and efficiency of direct interactions with the Bank staff.	
	Complaints' resolution time measures how quickly and efficiently the Bank responds to and resolves the customers' concerns.	

Integration of customer feedback into the processes of developing and updating products and services

The Policy on Product Approval, Launch, and Modification, adopted at the level of the Deputy CEO - Retail Banking and the Deputy CEO of SME & Mid-Corporate, provides the framework for product development and updates. This process aims to integrate the results of analyses into the overall strategy and address issues identified during the development phase.

As part of the process, potential risks are assessed and mitigation measures are established through a structured analysis of commercial, operational, and compliance implications. The effectiveness of the measures adopted is constantly monitored, and adjustments are made when necessary.

The process of analysis, approval, implementation, and launch is organized into clear stages, which helps align products with market requirements and the Bank's strategic objectives.

Modifications to an existing product may occur due to various factors, including:

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

Proposals for launching or modifying products may come from any Bank's employee, regardless of their position, whether they work in a regional office, a branch, or at Headquarters. These suggestions may be submitted in various forms - documents, emails, phone calls, or through other communication channels - and must be directed to the Divisions/Departments responsible for managing those products or to those managing the relationship with the customer segment targeted by the product in question.

In case there is a modification to an existing product or service, it is mandatory to provide a written notification and involve the relevant Divisions/Departments from the initial phase, so that the process is managed efficiently and in accordance with Internal Rules of Procedure. This rigorous process ensures a comprehensive risk assessment, optimal integration into the Bank's products portfolio, and full transparency in communicating changes to stakeholders.

Assessment of the customer engagement processes effectiveness

The effectiveness of customer engagement processes is assessed through the constant monitoring of performance indicators such as the Net Promoter Score and Customer Effort Score, which reflect the level of satisfaction and the overall experience of consumers and end-users.

In addition to these indicators, the way complaints and grievances are managed plays an important role, as it provides direct insight into areas requiring improvement. The bank has implemented a structured framework for resolving complaints, focused on transparency, respecting the rights of complainants, and providing clear and reasoned responses within the timeframes prescribed by law.

The time taken to resolve complaints is tracked as a performance indicator. For complaints not related to payment services, the maximum response time is 30 calendar days from receipt, and for those regarding payment services, the response is provided within a maximum of 15 business days, with the possibility of extending this to 35 business days in exceptional circumstances. Monitoring these deadlines contributes to the continuous improvement of processes and the strengthening of customer trust.

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KPI for Complaints and Complex Requests:

Average Resolution Time (calendar days) - 7 days

→ % Resolution rate 2025 ≤ 7 days – 68%

→ % resolved by 2025 ≤ 14 days – 83%

Complaints' management is handled by a specialized unit, the Complaints Management Department within the Contact Center & Customer Care Division, which analyzes and resolves each complaint individually. This unit monitors the entire process, collaborates with other departments to identify optimal solutions, and implements corrective measures to prevent similar issues in the future.

In 2025, the experience of the customers who chose to interact with the bank through the Contact Center was constantly monitored, with a focus on service quality and the efficiency of request resolution. Thus, the post-interaction experience was evaluated using standardized quantitative indicators. The results obtained highlight a high level of satisfaction and an increased capacity for efficiently resolving requests.

The post-interaction satisfaction score (**CSAT**) reached **91%**, indicating customers' positive perception of the quality of interactions and how their requests were handled.

At the same time, the **First Call Resolution (FCR)** rate was **92%**, reflecting the efficiency of operational processes and reducing the need for repeated customer contacts.

Processes for engaging with consumers and end-users regarding impacts

Channels available to customers for feedback and complaints

Effective management of feedback and complaints is an important tool for improving customer relationships and quickly correcting any malfunctions. Access to clear and transparent reporting channels allows for the identification of issues and the adoption of necessary measures in a structured manner.

To ensure impartiality and prevent conflicts of interest, complaints involving an employee or contractor of the Bank cannot be resolved by the person in question or by a direct subordinate of that person. If an employee receiving a complaint identifies a potential

conflict of interest, they must inform the Complaints Management Department and their supervisor and refrain from taking any action regarding the complaint. If the complaint involves members of Banca Transilvania's management team, it is escalated to the unit responsible for managing compliance risk and conflicts of interest.

Customers may submit complaints through various channels made available to them, including dedicated email addresses, letters addressed to the Bank, via the Bank's website or that of each subsidiary, through social media, or in person at the Bank's headquarters or any branch.

Entity	Channels for reporting issues/complaints
Banca Transilvania	dpo@btrl.ro gdprsuport@btrl.ro myalert@btrl.ro https://bancatransilvania.whistlelink.com/ investor.relations@btrl.ro sesizariesg@btrl.ro conflictinterese-conformare@btrl.ro contact@btrl.ro Secure messaging - BT PAY Web Internet Banking Contact Center: 0264 308 028, *8028, social media: Facebook in person, at any BT branch/agency, in writing, via a letter submitted at any BT branch/agency or sent to the BT headquarters at 30- 36 Calea Dorobantilor, Cluj Napoca, 400117
BT Direct IFN	contact@btdirect.ro
BT Microfinanțare IFN	dpo@btmic.ro
BT Asset Management	MyAlertBTAM@btam.ro conformare@btam.ro
BT Capital Partners	myalert@btcapitalpartners.ro
BT Leasing Transilvania IFN	Call Center: 0264303283 aplicația BTmyLeasing

Improvement Credit Collection	office@iccollect.ro reclamatii@iccollect.ro
BT Pensii S.A.F.P.F.	reclamatii@btpensii.ro
BRD S.A.F.P.P.	reclamatii@btpensiipius.ro
BT Leasing Modova	contact@btleasing.md Departament Client Service: +(373 22) 260 790 +(373 22) 260 780
BT Broker de Asigurări	dpo@btleasing.ro
Fondul Imobiliar de Investitii Alternative BT Property	btbuilding@btrl.ro
Salt Bank	SALT: (*7258) sau 037 381 19 13; In-app chat; Self-service (FAQs) Direct call from the app. Offline message in the app.
Victoria Bank	Customer Support at 1303 (0 30 30 30 00); at a branch/agency
OCN Microinvest	sesizari@microinvest.md hot line: 022 802 100 Call-Centre: 022 801 701

Processes through which the company supports or requests the availability of channels

In the field of payments processing and digital services, Banca Transilvania acts in two distinct roles: as a card issuer and as a payment acquirer. As an issuer, the Bank offers cards and related services to individuals and businesses, enabling them to make secure payments and transactions both domestically and internationally. As a payment acceptor, the Bank provides merchants with solutions for accepting card payments, either through physical POS terminals or online payment platforms.

For both types of services, customers and business partners have access to dedicated channels for submitting complaints and requests, including at the bank branches, through

the Call Center, and via email, thereby ensuring a clear and efficient process for handling complaints.

Penalties and fines for non-compliance with laws and regulations regarding the provision and use of financial products and services

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In 2024 and 2025, there were no environmental fines or penalties.

Penalties and fines for non-compliance with laws and regulations regarding the provision and use of financial products and services

During the reporting period, Banca Transilvania and the entities within the BT Group recorded a limited number of fines and non financial sanctions as a result of inspections carried out by the competent authorities, as well as complaints submitted through alternative dispute resolution mechanisms. At the Bank level, in 2025, a small number of fines were imposed, with an immaterial cumulative financial impact, together with non financial sanctions and warnings, mainly related to operational or procedural matters.

In addition, the Bank was subject to inspections conducted by the National Authority for Consumer Protection (ANPC), following which administrative sanctions were applied, reflecting the intensity of supervisory activity across the banking sector. These situations did not indicate systemic deficiencies and did not have a significant impact on the Bank's operational or financial stability.

At BT Group level, the volume of litigation pending before the courts is correlated with the scale and nature of the activities carried out. For the main entities, the majority of cases are derived from loan agreements, while non credit related litigation represents a limited impact. A significant proportion of the cases concluded were resolved in favour of the BT Group entities, with particularly high success rates for subsidiaries primarily engaged in lending activities. For certain BT Group entities, no fines or sanctions were recorded for non compliance with legislation governing the provision and use of financial products and services during the reporting period.

At consolidated level, compliance, internal control, complaints handling and litigation management processes are continuously monitored and enhanced, with the aim of reducing legal and reputational risks and ensuring compliance with the applicable legal framework and the protection of consumers' rights.

Measures to manage significant impacts, risks, and opportunities in customer relations

In its customer relationships, the Group implements measures to manage identified impacts, risks, and opportunities, aiming to maintain an adequate level of protection and trust. To this end, actions are implemented to improve access to services, increase transparency, and continuously adapt products to the needs of different customer segments.

Development of inclusive financial products

Equitable access to financial products and services is essential for an inclusive and resilient society. When all social groups can use financial instruments that are secure and tailored to their needs, a solid foundation is laid for sustainable economic development. Expanding financial access reduces social disparities, supports entrepreneurial initiatives, stimulates economic mobility, and encourages innovation in the financial sector, thereby contributing to collective well-being.

The Group offers its customers a range of solutions designed to support Romanian individuals and entrepreneurs, regardless of their location, income level, or business size. These solutions facilitate access to financial products and services, including for people in rural areas or with limited accessibility.

For the retail segment, the Group develops products and services tailored to different customer categories, considering the specific needs of working adults, young people, students, children, and retirees. The offer includes checking accounts, cards, savings and investment products, consumer and mortgage loans, as well as digital solutions that facilitate personal finance management.

Banca Transilvania supports consumers and end-users through a diverse range of lending services, designed to responsibly meet the financial needs of the population and facilitate equitable access to financing. The retail loan portfolio includes consumer loans, such as the Personal Loan, which offers flexibility in covering current needs, as well as mortgage loans: Home Loan, Mortgage Loans, Fixed-Rate Mortgage Loans, Variable-Rate Mortgage Loans, Green Mortgage Loans, and the Prima Casă/Noua Casă program, which supports access to housing, including through solutions with a low environmental impact.

The bank also offers consumers auto/vehicle loans, including loans for new and used cars, as well as revolving credit products such as Star Card, BT Flying Blue – credit card, Visa Gold credit card, Visa Platinum credit card, and Mastercard Forte credit card. Access to financing is complemented by digital solutions offered through the BT Direct online loan, contributing to an accessible, transparent banking experience tailored to different categories of end users.

The bank also offers products tailored to the needs of young people, such as the BT Omnipass card, which includes benefits such as free account opening and card issuance,

travel insurance abroad at no additional cost, and discounts available through the Omnipass program. To benefit from these advantages, customers must be aged between 14 and 30 years old.

Financial solutions for children include the Kiddo debit card and the BT Pay Kiddo app, which help foster healthy financial habits from an early age, under parental guidance. In this way, we build a solid foundation for financial education and independence, providing young people and children with the tools needed to manage their financial resources responsibly.

For non-retail customers, Banca Transilvania supports responsible economic development and business continuity through a structured range of loans. This includes working capital products, such as the quick loan or the quick credit line. For the acquisition or development of real estate assets, the following products are available: the Corporate Real Estate Loan, the Mortgage Loan for Legal Entities, and the Real Estate-Secured Loan; and entrepreneurial initiatives in the agricultural sector are supported through a dedicated product - the Agricultural Loan. The sustainability dimension is also reflected in green loans, intended for sustainable agriculture, water and waste management, green energy, and energy efficiency. Operational financing needs are complemented by instruments such as discounting and factoring.

The corporate client category is also defined in the Bank's [Sustainable Finance Framework](#).

- a) Financing and/or refinancing of SMEs, aimed at creating jobs and programs designed to prevent and/or mitigate unemployment, as well as climate transition projects. SMEs targeted categories are:
 - those located in socio-economically disadvantaged areas* (nationwide),
 - those owned by women,
 - those owned by young people,
 - start-ups (newly established, no older than three years),
 - owned by farmers engaged in self-employment in socio-economically disadvantaged areas.
- b) For access to healthcare, financing and/or refinancing the construction and/or operation of medical care, primary palliative care, and/or dialysis and/or oncology facilities:
 - healthcare facilities: private hospitals affiliated with the national health system
 - primary care facilities: free primary healthcare facilities affiliated with the national health system,
 - palliative care centers: private palliative care facilities (hospices) affiliated with the national health system,
 - dialysis and oncology facilities: private dialysis and oncology centers affiliated with the national health system.

- c) Financing and/or refinancing the construction and/or operation of educational facilities and/or student housing:
 - o Educational facilities: public educational institutions, such as schools, universities, student housing, and Level 3 housing, as well as vocational training centers.

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

Solutions tailored for micro-enterprises are offered through BT Mic and include the Loan for Small Businesses, the Loan for Small Businesses in Agriculture, the Loan for Small Businesses in Education, and loans backed by European Guarantees.

Victoriabank offers consumer loans and flexible financing solutions, such as the Consumer Loan, Secured Loan, Express Online Loan, and Overdraft, as well as credit card products, including the STAR Card and STAR Card Platinum. The portfolio is complemented by real estate loans: the Real Estate Loan, the Real Estate Refinancing Loan, and the Prima Casă Plus program loan, which supports access to housing and the responsible management of personal finances. For legal entities, Victoriabank offers financing solutions to support current operations and further development of corporates, including working capital loans, credit lines, overdrafts, loans for agricultural investments, as well as factoring and financing through special programs that may include guarantees, interest subsidies, or other incentives. This offering reflects the bank's commitment to supporting end-users and the business community through accessible, diversified lending instruments tailored to the current economic context.

The development and provision of inclusive products and services represent one of the ways in which the Group addresses the impacts, risks, and opportunities identified in its relationship with customers. This initiative is implemented across the Bank's entire network, with products available through both physical branches and digital channels.

The actions through which the Bank manages the impacts, risks, and opportunities in its relationship with customers are integrated into the process of developing and updating products and services. Their launch and adaptation represent a continuous process, carried out based on an internal schedule that establishes clear stages of analysis, approval, implementation, and monitoring. Products are reviewed periodically, including from the perspective of the clarity of contractual terms and the accessibility of information, and adjustments are made based on market developments and customer feedback.

To mitigate potential negative impacts on consumers, protective mechanisms and relevant institutional partnerships for handling complaints are maintained. The effectiveness of these measures is monitored using performance indicators such as the Net Promoter Score, Customer Effort Score, and Human Interaction Score, as well as by tracking complaint resolution times. The necessary resources are allocated in accordance with the annual

budget, including for the continuous development and optimization of digital products and channels.

Servicii financiare pentru toți

The Group continued to strengthen access to financial products and services for underserved and rural communities by expanding access points and digital channels.

At Banca Transilvania, data from the past three years reflect both the increasing level of digitalization in rural areas and the diversification of financial infrastructure.

Banca Transilvania: Access points in economically underdeveloped or less populated areas	2025	2024
% of digital customers among BT's rural customers	76.00%	69.00%
% of rural customers among digitized customers	17.00%	15.40%
ATMs in rural areas	9.00%	6.80%
POS terminals in rural areas	12.00%	11.20%
Cardholders in rural areas	18.00%	16.50%

Victoriabank contributes to expanding financial access in the Republic of Moldova, including in sparsely populated areas or those with limited economic development. The evolution of its infrastructure over the past two years demonstrates a steady increase in access points and the use of modern financial services.

Victoriabank: Access points in economically underdeveloped or less populated areas	2025	2024
Nr. of branches	32	30
Nr. of ATMs	132	122
Nr. of Pos terminals	4,114	3,302
Cards	316,912	260,686

BT Direct

In 2025, 51.16% of BT Direct cardholders were from rural areas, up from 50.18% in 2024. This progress reflects the expansion of financial services accessibility for underserved segments of the population. At the same time, customers who receive a BT Direct card are enrolled in a financial education program within one month of issuance: they are contacted by phone and receive information about the card's features and responsible use, based on an educational script.

BT Mic

BT Mic offers lending solutions for early-stage entrepreneurs and businesses with annual revenue of up to RON 1 million, regardless of their legal status: authorized sole proprietors, sole proprietorships, freelancers, agricultural producers, or NGOs. Most of BT Mic's clients are family businesses, deeply rooted in the communities where they operate, thereby contributing to local economic development and increasing the resilience of rural areas.

BT Mic	2025	2024
Growth in loan balances compared to the previous period	31.23%	31.02%
Increase in the number of financed customers compared to the previous period	22.73%	24.97%
Number of clients financed since launch	43,409	35,369
No. of loans granted since launch	61,223	49,004
Total amount granted since launch	3,921,460,839	2,988,145,032
Loans granted during the year	12,219	10,167
Outstanding loans granted to customers with female shareholders	13,170	10,905
Loans granted during the year to customers with female shareholders	5,005	4,322
Outstanding loans granted to customers with shareholders under 30 years of age	4,646	3,876
Loans granted to customers with less than 30 years of ownership	1,811	1,484
BT Mic First lender (among new customers financed)	69.4%	73.50%
Loans granted to startups within the year (<=18 months)	23.4%	23.70%

BT Mic Success Stories

MAVTEAM SERV – Celebrate Space

In 2025, MAVTEAM SERV, a startup with an all-female entrepreneurial team, secured financing through BT Mic to develop a space dedicated to hosting events for children and adults, under the Celebrate Space concept.

The investment focused on setting up and equipping a multifunctional space in Bucharest, which includes a modern indoor area, a fully equipped kitchen, a relaxation area, and an outdoor courtyard. The business model is geared toward organizing private events, such as birthdays and themed parties for children, as well as meetings or training sessions for adults.

Through this funding, the company has strengthened its operational capacity and created a suitable framework for developing an integrated event planning service, while also contributing to the support of women's entrepreneurial initiatives in urban areas.

SUIIT

SUIIT is a startup in the artisanal dessert production sector, with less than 18 months of operational activity at the time the loan was granted. In 2025, the company received a financing from BT Mic for the purchase of equipment, the renovation of the production space, and working capital support.

The business model focuses on the production of premium desserts, made in-house, with an emphasis on quality, consistent standards, and operational efficiency. In addition to direct sales, the company also offers manufacturing services for partners in the HoReCa sector, helping to optimize costs and ensure constant control over food quality and safety.

The funding supported the consolidation of the production infrastructure and the development of the company's capacity to meet the growing demand present in the artisanal desserts segment.

Digitalization for Accessibility

Digitalization continues to be a strategic pillar in expanding access to financial products and services, helping to reduce traditional barriers, whether geographic, economic, or related to knowledge levels. Through simple, efficient, and scalable technological solutions, the Group facilitates customer access to relevant services at any time and from any location.

Customers are showing increasing interest in modern solutions that streamline the management of financial services. Among the frequently used digital tools are virtual cards,

credit products, savings, investments, insurance, and private pensions, all integrated into a unified digital ecosystem.

Digitalization plays a fundamental role in transforming the banking sector and directly contributes to sustainable development goals. It promotes financial inclusion, reduces the carbon footprint, and supports the transition to a sustainable, low-emission economy. By 2025, the Bank facilitated access to financial services for segments of the population that previously lacked consistent interaction with the traditional banking system, by expanding access to mobile and online services. As a result, banking products and services have become more accessible to people in remote or underserved areas, helping to reduce economic and social disparities.

At the same time, the transition to digital processes has generated significant benefits in reducing the environmental impact. The migration of operations from the physical to the digital environment limits the consumption of paper and resources, and remote access to banking services reduces the need for travel, thereby lowering the carbon emissions associated with traditional operations.

The digitization process continued in Banca Transilvania during 2025, contributing significantly to expanding access to financial services and improving the customers' experience. These developments reflect a consistent growth compared to 2024, both in terms of the number of digital users and the volume of transactions processed through digital channels.

The number of digital customers reached 4.9 million in 2025 (4.4 million in 2024), reinforcing the shift toward digital solutions and confirming their preference for fast, secure, and accessible interactions. The number of active cards grew from 7 million in 2024 to 8.1 million in 2025, with Banca Transilvania maintaining its leading position in the card market.

At the same time, transactions made with BT cards recorded an annual growth of 19%, continuing the positive trend observed during the last years. Credit cards exceeded 769,000 units in 2025, thus contributing to the diversification of the portfolio of digitally used products.

Mobile payments increased by 29% in 2025 compared to 2024, and the number of unique cards enrolled in BT Pay, Apple Pay, Google Pay, Fitbit Pay, and Garmin Pay reached 5.7 million in 2025 from 4.5 million in 2024, confirming the accelerated adoption of digital wallets.

Money transfers initiated via the BT Pay app increased by 70% in 2025 compared to 2024, while the volume of non-card digital transactions grew by 24% compared to 2024, reflecting the gradual shift from traditional operations to integrated digital solutions.

Thanks to the continuous expansion of its digital and physical infrastructure, by the end of 2025 BT had a network of: 2,031 ATMs (compared to a smaller network in 2024), including 696 multifunctional ATMs and 577 BT Express terminals used for non-cash transactions,

over 178,000 installed POS terminals and 40,000 STAR partner locations with partnerships covering over 8,000 e-commerce merchants, an increase from the previous year.

BT Chat continued to be a relevant digital support tool, exceeding 1.5 million interactions in 2025. The new technological optimizations resulted in over 80% of requests being resolved automatically, while only 20% of the conversations required human intervention by consultants.

In addition, the launch of the feature to enroll in a voluntary pension fund (Pillar III) directly through BT Pay, in August 2025, generated over 8,600 new enrollments, thus consolidating the list of long-term savings products integrated into the bank's digital ecosystem.

Digital Accessibility

Digital accessibility is a strategic priority for Banca Transilvania, in line with the bank's commitment to providing inclusive financial services that comply with Law No. 232/2022 and the international WCAG (Web Content Accessibility Guidelines) standards.

These are a set of international standards that establish how digital websites and applications should be designed and developed so that they are accessible to all users, including people with disabilities.

The Bank aims to ensure equitable access to its digital platforms for all users, including people with disabilities, as the full requirements take effect on June 28, 2025.

In 2025, BT continued its website accessibility program, based on the external audit conducted for the desktop and mobile versions of the apps. Given the complexity and volume of content, accessibility remains a gradual process, with WCAG-compliant versions being released successively. A significant step forward is the implementation of the accessibility widget, which allows users to customize the interface by adjusting contrast, enlarging text, enabling dyslexia-friendly mode, disabling animated elements, and simplifying navigation for users with visual or cognitive impairments.

In parallel, the Bank has initiated the process of adapting the BT Pay app, based on a partial audit conducted for screens critical from the users' perspective. The implementation of the recommendations is managed internally and aims to optimize visual elements, increase contrast and readability, adapt interactive areas for users with motor impairments, improve the logical structure, and ensure full compatibility with screen readers.

At the same time, BT has published [its Accessibility Statement](#), available on the website under the "Diversity & Inclusion" section.

The document outlines the institution's commitment to accessibility, the results of the June 2025 audit indicating partial compliance with the in-place requirements, as well as the main barriers identified (lack of text alternatives, inaccessible semantic structure, insufficient contrast, and difficulties navigating exclusively with the keyboard). The statement also

includes a remedy plan, which provides for the gradual implementation of compliant versions and periodic updates based on progress made.

In addition, the bank has established a feedback mechanism for reporting accessibility issues, with users able to use the dedicated section on the website and the email address accesibilitate@btrl.ro , with a response time of up to 30 days.

Through these measures, Banca Transilvania is strengthening its commitment to digital inclusion, equal access, and progressive compliance with European and national accessibility legislation.

BT Go

Continuing its efforts to support the SME sector, BT has dedicated time and resources to effectively improving the all-in-one banking platform for entrepreneurs, BT Go, which has become an adaptable business ecosystem. By the end of 2025, the adoption and usage of the service had grown significantly, with the number of users reaching 330,767 and the volume of transactions reaching 29 million, with an impressive cumulative value of RON 329 billion.

The platform offers a useful set of features:

- Fast payments and transfers
- Standard and negotiated exchange rates
- Opening and closing of standard and negotiated deposits
- Viewing/managing limits and blocking/unblocking cards
- Statement download FGO and RO e-Invoice integration

Digitization at BT Mic

In the area of digitalization and financial inclusion, BT Mic significantly simplified the loan application process by introducing Raul chatbot, a user-friendly digital channel that generated 23.3% of all financing requests in 2025.

Through the Stup platform, BT Group continued in 2025 to support the professionalization of Romanian entrepreneurs, contributing to increased operational efficiency and facilitating access to digital tools essential for sustainable business development.

Throughout 2025, over 1,900 unique companies accessed the digital solutions available on Stup, purchasing more than 3,100 digital products dedicated to online commerce and the digitization of business processes, such as electronic signatures, invoicing solutions, digital cash flow, and courier services. These solutions have supported tax compliance, transparency, and good governance in the operations of small and medium-sized enterprises. By the end of 2025, the Stup community had cumulatively reached over 20,000 products accessed.

Through these initiatives, Stup actively contributes to the digital inclusion of the entrepreneurial environment, the improvement of governance practices, and the development of a more resilient and sustainable economic ecosystem in Romania.

In 2025, “Raul de la BT” chatbot, dedicated to entrepreneurs at BT Mic, has become an important tool for digital inclusion, facilitating rapid access to financial information and essential services for over 51,853 unique users, including 44,699 authenticated customers who interacted with it on a recurring basis. In total, over 1 million messages were exchanged, with the chatbot receiving 528,278 and sending 1,022,139, thus demonstrating a high level of usage and operational reliance for entrepreneurs. The most accessed flows were Account Balance (59.32%), CE/BO Request (21.74%), and Garnishment Info (7.68%), reflecting the real needs of small and medium-sized businesses for rapid and autonomous management of financial information. Additionally, 13,257 customers provided feedback on various workflows, mostly on CE/BO Request (83.59%), and the overall experience with the chatbot was rated as “very good” by 75.95% of the users and “good” by another 12.79%, thus confirming its role in reducing digital barriers and increasing easy access to banking services for entrepreneurs in the BT ecosystem

Victoriabank

In 2025, the VB24 app maintains its role as an essential digital channel for interacting with individual customers, ensuring permanent access to banking services. Available both as a mobile app via Google Play and the App Store and as a web version, the app allows users to open accounts and cards, make payments, and easily manage their banking relationship at any time. The MIA Instant Payments service remains integrated into the bank’s digital ecosystem, offering the ability to send and receive transfers in seconds - based on a phone number, without entering card details. Transfers are made in MDL between domestic bank accounts, quickly and securely.

Available features include P2P transfers based on aliases, R2P payment requests, QR code payments, and Me2Me transfers between personal accounts held at participating financial institutions. The app also allows for the direct payment of government securities purchased through the evms.md platform, expanding users’ access to investment services via the digital channel.

BT Direct

In 2025, digital accessibility for BT Direct customers continued to advance, with a significant increase in the use of the BT Pay app. The number of BT Direct cards enrolled in the app reached 58,487, surpassing the 2024 level of 54,357, representing an increase of 4,130 cards (+7.6%) and indicating an increasingly solid adoption of digital channels. Although the online portal was accessed by 6,884 customers in 2025, a decrease from the previous year, the available features (i.e. mobile payments, viewing card details, confirming

online payments, checking balances, and reviewing recent transactions) helped facilitate digital interaction and modernize the BT Direct customer experience.

BT Capital Partners

The BT Trade (EVO) desktop trading platform and the BT Trade apps for iOS and Android allow clients to place, modify, and cancel trading orders online. Additionally, the BT Trade (EVO) platform and the BT Trade mobile app allow for the opening of trading accounts exclusively online; the documents required for account opening are accepted directly within the platform, eliminating the need to print or sign physical documents. To minimize paper usage, orders from clients assisted by a broker are primarily taken over the phone or via email; paper orders are permitted only in exceptional circumstances.

New contract	2025	2024
On-line	84%	81%
Paper	16%	19%
Total	100%	100%

Orders	2025	2024
On-line	99%	99%
Paper	<1%	1%
Total	100%	100%

Total number of customers	2025	2024
Online	71%	65%
Assisted	29%	35%
Total	100%	100%

The BT Visual Help System

BT Visual Help is Banca Transilvania's digital self-service platform, designed to help customers quickly access information about their bank accounts and products directly from their phone, without waiting on hold or interacting with an agent.

BT Visual Help plays a new role in the support ecosystem: educating customers on BT Pay features. BTVH is connected to BT Pay for common requests and for support provided via ChatBT. Thus, in 2025, 4.9 million visual sessions were initiated, thanks to the numerous new features in BT Pay and the migration of customers to the native app.

The CSAT score, which reflects customer satisfaction measured at the end of a visual session by completing the feedback form, was 93% in 2025.

Ask BT

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

- Over 3.5 million people visited the site in 2025, and nearly half a million did so to chat with AI Search
- On average, visitors ask 3 questions via AI Search and stay in the conversation for about 3 minutes
- Visitors' interest has shifted from year to year, so the most searched-for information is about the BT Pay and BT Go apps and about BT products and services
- Nearly 80% visit the site from a mobile phone, and 55% landed on the website via direct access.
- From abroad, the site is visited mainly from Germany, the UK, Italy, Spain, and France. The number of visits from the Republic of Moldova has increased year over year.

Banca Transilvania integrates artificial intelligence into its online communication, services, and processes, using both Robotic Process Automation (RPA) and Large Language Models (LLM).

BT Dialog Branches

BT Dialog branches offer free, personalized financial advice, ranging from loans and related products to insurance and digital solutions, making them the perfect place for the Bank to engage in an open dialogue and find personalized solutions for each client.



There is currently a network of 42 Dialog branches, and customers can find their locations directly on the BT website, in the branch network section.

Measures implemented to address or mitigate a real material impact

To address the actual impact on consumers and end-users, the Bank has implemented concrete measures designed to ensure easy access to relevant information about the products and services offered. Thus, consumers have access to up-to-date details via the dedicated micro websites of each entity of the Group, but also in the BT branches and units, where essential information, such as the list of fees and charges, is available in the customers' information booklet.

Regarding consumer safety, Banca Transilvania pays special attention to informing and protecting its consumers in the digital environment. A dedicated blog-style page, [BT Online Security](#), has been launched, where essential topics such as fraud, cyberattacks, online shopping security, the proper use of ATMs, and the protection of entrepreneurs against digital risks are addressed. The page also includes a special section for news, providing constant updates on the types of fraud and practical methods users can use to protect their data and bank accounts. Details on the measures and actions implemented by the Group during the reporting period can be found in section 3.6, Cybersecurity and Personal Data Protection.

Additional initiatives or processes primarily aimed at generating positive outcomes for consumers and end users

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

To support entrepreneurs even more effectively, BT has created dedicated business lines, contributing to the building of a robust and sustainable entrepreneurial ecosystem. In this way, the Bank maintains its commitment to adding value to the communities in which it operates, offering financial solutions tailored to the specific needs of early-stage businesses.

A key pillar of BT's strategy is the continuation of partnerships with international financial institutions (IFIs), such as the European Investment Fund (EIF), the International Finance Corporation (IFC), and the European Bank for Reconstruction and Development (EBRD). These collaborations enable the implementation of financing programs with a social and environmental component, designed to support education, women's entrepreneurship, financial inclusion, and the reduction of negative environmental impacts.

In addition, BT includes in its social financing framework client groups that need access to essential services (in line with SDG 11 – Sustainable Cities and Communities) and supports job creation (in line with SDG 8 – Decent Work and Economic Growth). A major objective of the Bank is to facilitate access to financing for those categories that are not normally

supported by state aid, thereby offering broader opportunities for economic growth and sustainable development.

Details about the sustainable financing products developed by the Group's entities can be found in subsection 3.3 Sustainable Financing.

Monitoring and assessing the effectiveness of actions or initiatives implemented for customers

Tools such as NPS (Net Promoter Score) an indicator that measures customers' willingness to recommend the bank) and HI (Human Interaction) an indicator that assesses the quality of customer–colleague interaction, specifically friendliness, clarity of answers, and the ability to meet the customer's needs) are used to track and evaluate the effectiveness of the actions and initiatives implemented for customers, providing a clear picture of the level of satisfaction, loyalty, and on the quality of interactions.

In 2025, the NPS for customers who performed transactions in the branches/units of BT was 86.25, and the HI recorded a score of 98.65, remaining at a very high level and posting an increase compared to the previous year. The results are based on nearly 80,000 feedback responses, of which approximately 75,000 came from retail customers and 5,000 from corporates.

Internally, customer satisfaction is monitored at multiple touchpoints: when opening an account, both in-branch and via digital applications; after completing a transaction in-branch; at the product level, in the context of launching new digital features; and in the evaluation of the overall relationship with the bank, including during the termination of the contractual relationship. This research provides relevant insights for the continuous improvement of the customers' experience.

The "reception concept" implemented across the BT network significantly contributes to an increased level of satisfaction. In situations where customers receive a dedicated "welcome" from a colleague who provides quick guidance and predictability, the NPS increases by over 25 points. A similar effect is observed when alternatives are offered for performing transactions through digital channels or self-service machines.

Implementing the closed-loop feedback process by analyzing and resolving every actionable element received through feedback, led to 85% of the passive customers becoming promoters and 50% of detractors becoming promoters. In 2025, issues reported by over 1,800 customers were addressed, 88% of which were resolved. Additionally, nearly 2,500 messages of appreciation regarding the interactions at branches were recorded.

Resources Allocated for Managing Material Impacts

To ensure equitable access to quality information, relevant financial products and services, as well as to guarantee the confidentiality of customer data, the Group allocates significant

resources to the development and implementation of the actions described above. These resources come from both internal sources and funding raised through bond issuances or participation in financing programs developed in partnership with international and supranational organizations. This blended approach ensures the sustainability of the investments needed to effectively manage material impacts and fulfill the commitments made to the Group's customers.

3.3 Sustainable Financing

The Role of Sustainable Finance in the BT Group's Strategy

Sustainable financing is one of the strategic directions through which the BT Group contributes to the transition to a low-carbon economy and to supporting sustainable economic development in Romania. As the main financier of the local economy, the bank plays a key role in directing capital flows toward economic activities that reduce environmental impact, promote the efficient use of resources, and support inclusive economic growth and long-term resilience.

The BT Group's approach begins with a structured analysis of the financing portfolio and the interaction between lending activities and the real economy. In this context, sustainability criteria are progressively integrated into lending and risk management processes, as well as into dialogue with clients, with the aim of supporting their adaptation to an economic environment characterized by increasing pressures related to the climate transition, resource efficiency, and long-term competitiveness requirements.

The relevance of sustainable financing is underscored by Romania's macroeconomic and social context, marked by the need to accelerate investments in energy efficiency, renewable energy, modern infrastructure, and technology. Although Romania's economy has continued to show positive momentum in recent years, the process of convergence toward the European Union average remains incomplete, and the benefits of economic growth are not evenly distributed across regions and segments of the population.

According to preliminary Eurostat data for 2024, Romania stands at approximately 78% of the EU average in terms of GDP per capita expressed in purchasing power parity. On the social front, significant disparities in income distribution persist, particularly between urban and rural areas, as well as across regions. Although the Gini index improved in 2024, income inequality remains a structural challenge. At the same time, World Bank data indicate that, between 2018 and 2023, the growth in real incomes of the most vulnerable segments of the population lagged behind the growth rate of the total population, highlighting the persistence of vulnerabilities in the labor market.

In this context, small and medium-sized enterprises continue to play a central role in Romania's economy, accounting for nearly all companies in the non-financial sector and employing a significant share of the workforce. This segment's ability to invest in modernization, energy efficiency, new technologies, and digitalization is essential for sustaining economic growth and accelerating the transition to a more sustainable development model.

To support this structural transformation, the European investment and financing framework places a strong emphasis on mobilizing investments through dedicated instruments, such as the National Recovery and Resilience Plan and the Structural and Cohesion Funds for the 2021–2027 period. These mechanisms create significant financing

opportunities for green and digital transition projects, with a direct impact on the competitiveness and resilience of SMEs.

However, capitalizing on these opportunities depends directly on companies' access to bank financing, which is necessary both for co-financing projects and for covering the capital needs associated with their implementation. Given the high cost of borrowing and collateral requirements, access to financing remains a structural constraint for many companies, reinforcing the role of financial institutions in facilitating the absorption of European funds and supporting investments with long-term impact.

In this macroeconomic context, sustainable financing is emerging as a key mechanism for directing capital toward investments that address both environmental and social challenges, but especially long-term economic growth objectives. Through its lending activities, the BT Group contributes to supporting these investments by facilitating access to capital for various segments of the economy and supporting processes of adaptation to climate change, modernization, and sustainable development.

Specifically, the role of sustainable finance in the BT Group's strategy is reflected in:

- supporting economic development and access to financing, particularly through financing micro, small, and medium-sized enterprises;
- supporting the transition to a low-carbon economy by financing energy efficiency, renewable energy, sustainable infrastructure, and innovative technology projects;
- channeling capital toward economic activities with a positive impact on the environment and society by integrating ESG criteria into lending processes and using internationally recognized frameworks and methodologies to identify and classify sustainable financing.

At the same time, the structure of the loan portfolio reflects how the BT Group's financing activities interact with the key sustainability themes identified in the Group-wide double materiality analysis. The distribution of exposures by economic sector allows for an assessment of the relevance of different business areas in terms of their impact on the environment and society, as well as the risks and opportunities associated with the transition to a more sustainable economy.

The table below presents the structure of Banca Transilvania's and BT Group's loan portfolio, broken down by economic sector, highlighting the distribution of exposures as of 2025.

Loan portfolio by economic sector (NACE Rev.2.1)	%2025 BT	%2024 BT	%2025 GFBT	%2024 GFBT
A. Agriculture, forestry and fishing	4.45%	4.87%	5.01%	5.63%
B. Mining and quarrying	0.24%	0.10%	0.25%	0.15%
C. Manufacturing	6.41%	6.74%	6.85%	7.18%
D. Electricity, gas, steam and air conditioning supply	2.69%	2.17%	2.62%	2.12%
E. Water supply; sewerage, waste management and remediation activities	0.36%	0.31%	0.42%	0.40%
F. Construction	2.84%	3.08%	3.64%	3.87%
G. Wholesale and retail trade	8.32%	9.54%	10.02%	10.86%
H. Transportation and storage	3.12%	3.16%	4.19%	4.18%
I. Accommodation and food service activities	1.61%	1.38%	1.88%	1.68%
J. Publishing, broadcasting, and content production and distribution activities	0.06%	0.06%	0.10%	0.09%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	1.06%	0.63%	1.29%	0.76%
L. Financial and insurance activities	7.95%	8.27%	1.11%	1.32%
M. Real estate activities	5.35%	3.77%	5.16%	4.67%
N. Professional, scientific and technical activities	0.82%	0.87%	1.29%	1.38%
O. Administrative and support service activities	0.79%	0.73%	1.22%	1.04%
P. Public administration and defence; compulsory social security	10.77%	11.75%	10.06%	10.05%
Q. Education	0.09%	0.08%	0.17%	0.15%
R. Human health and social work activities	2.08%	2.42%	2.22%	2.27%
S. Arts, sports and recreation	0.20%	0.63%	0.32%	0.63%
T. Other service activities	0.41%	0.42%	0.82%	0.64%
U. Activities of households as employers and undifferentiated goods - and service-producing activities of households for own use	0.00%	0.00%	0.00%	0.00%
V. Activities of extraterritorial organisations and bodies	0.00%	0.00%	0.00%	0.00%
INDIVIDUALS	40.38%	39.05%	41.37%	40.93%
Total	100%	100%	100%	100%

To ensure the comparability of the data presented, the distribution of the loan portfolio for 2024 has been transposed into the NACE Rev. 2.1 classification structure applicable as of January 1, 2025. This adjustment reflects solely an update to the sectoral classification and does not imply any changes to the exposure values.

Policies and Frameworks for Sustainable Financing

To operate this strategic role and direct capital flows toward economic activities with a positive impact on the environment and society, the BT Group utilizes a set of internal policies, assessment methodologies, and frameworks dedicated to sustainable finance used in capital markets. These tools enable the channeling of capital toward sustainable economic activities, as well as the classification and monitoring of sustainable financing provided to clients.

In practice, the BT Group's approach is based on two complementary mechanisms:

- internal policies and methodologies applied in day-to-day lending activities, through which sustainable financing provided to clients is identified, assessed, and classified;
- the BT Group's Sustainable Financing Framework, used for issuing green, social, or sustainable financial instruments and for allocating the funds raised to eligible loan portfolios.

Sustainable Lending Policy in Day-to-Day Lending Activities

At the operational level, the European Programs and Green Loans Department is the specialized unit within the bank responsible for coordinating and consolidating sustainable financing activities. The department plays a central role in developing and implementing sustainable financing products across the bank's business lines, helping to identify sectors, industries, and clients with the potential for positive impact, as well as relevant financing programs and opportunities. At the same time, it ensures the definition of structures, workflows, and rules applicable to sustainable lending, the transfer of know-how to the regional network and business lines, as well as the incorporation of European, national, or international partner requirements into the internal lending framework.

The department's activities are governed by the Internal Instruction on Sustainable Financing, a document that establishes the criteria for identifying, classifying, and monitoring financing with a positive impact on the environment or society. The Instruction defines the methodology used by the bank to identify and label sustainable loans in the lending portfolio and describes the main categories of eligible financing.

Categories of financing with a positive impact on the environment

Under the internal methodology, financing with a positive impact on the environment is structured into eight main categories, each of which is aligned with the United Nations Sustainable Development Goals.

Renewable Energy (RE)

Financing in this category targets investments in infrastructure or equipment that enables the production or use of energy from renewable sources, such as solar, wind, hydro, geothermal, biomass, or biogas.

Eligible projects include the construction or installation of renewable energy production capacity, as well as the manufacture or supply of equipment intended exclusively for the generation or use of energy from renewable sources. In certain situations, funding may target projects implemented by companies that use the energy produced primarily for their own consumption, as prosumers.

These investments directly contribute to achieving SDG 7- Affordable and Clean Energy.

Energy Efficiency (EE)

Funding for energy efficiency targets investments made by companies to reduce energy consumption through equipment modernization, optimization of industrial processes, or the implementation of more energy-efficient technologies.

Eligible projects include the purchase or modernization of production equipment and energy systems or the implementation of energy-efficient technologies. Eligibility is determined based on minimum criteria regarding the reduction of energy consumption or greenhouse gas emissions.

This funding contributes to SDG 9 – Industry, Innovation, and Infrastructure.

Sustainable Transport (T)

Funding for sustainable transport includes investments in electric or plug-in hybrid vehicles, as well as the modernization of transport fleets to improve energy efficiency.

For projects aimed at replacing existing vehicles, the new vehicles must provide a significant improvement in fuel efficiency or use low-emission technologies.

This category contributes to SDG 11 – Sustainable Cities and Communities.

Green Buildings (GB)

Funding for green buildings includes projects for the construction or renovation of buildings that comply with recognized energy performance and sustainability certification standards, such as LEED, BREEAM, EDGE, or DGNB. Buildings that meet nZEB (nearly zero energy buildings) standards are also considered eligible.

These investments contribute to improving the energy performance of the real estate sector and reducing resource consumption, aligning with SDG 11 - Sustainable Cities and Communities.

Water Efficiency (WE)

Funding in this category includes investments aimed at reducing water consumption or optimizing the use of water resources in industrial processes or service infrastructure.

Projects may include the modernization of existing facilities, the implementation of water recycling or reuse systems, the use of alternative water sources, or the installation of advanced wastewater treatment technologies.

These investments contribute to SDG 14 – Life Below Water and SDG 13 – Climate Action.

Climate Change Adaptation (CCA)

This category includes funding for projects that help reduce the vulnerability of economic and social systems to the effects of climate change.

Eligible projects may focus on infrastructure to protect against extreme weather events, climate risk management solutions, or measures to increase the resilience of infrastructure and ecosystems.

This funding contributes to SDG 15 – Life on Land.

Special Environmental Funding (SEF)

The special environmental funding category includes projects that contribute to climate change mitigation or environmental protection, but for which the impact on emissions reduction cannot be directly quantified.

The most common area falling under this category is the circular economy, through funding for investments that give equipment a second life or facilitate waste recycling: the purchase of equipment for waste collection and recycling, including waste from agricultural activities, as well as for the recovery and reuse of certain waste components. Examples of eligible projects include funding for companies developing technologies for climate-smart agriculture, research and development activities in the field of sustainability, or afforestation and biodiversity protection projects. Equipment such as batteries for energy storage or grid stabilization, as well as systems for collecting information related to reducing the carbon footprint, are also eligible.

This funding contributes to SDG 12- Responsible Consumption and Production.

Blue Financing

Blue financing targets projects that contribute to the protection and sustainable management of aquatic ecosystems and water resources.

This category includes investments in water supply and treatment infrastructure, technologies to reduce marine pollution, projects in the sustainable fisheries sector, or initiatives to reduce plastic waste in aquatic ecosystems.

These investments contribute to SDG 6- Clean Water and Sanitation and SDG 14- Life Below Water.

Identification and classification of financing with a positive environmental impact

To identify and classify financing with a positive environmental impact, the bank uses internationally recognized tools and methodologies, including:

- CAFE (Climate Assessment for Financial Institutions), an application developed by the International Finance Corporation (IFC) to assess the climate eligibility of projects;
- Green Gateway, used in financing programs implemented in partnership with international financial institutions, such as the European Investment Fund (EIF) or the European Investment Bank (EIB).

These tools enable the validation of project eligibility and the classification of financing based on the type of impact generated.

The labeling of financing with a positive environmental impact, in accordance with internal methodology, is carried out within the bank's internal systems, and the validation of project classification is performed by specialists within the departments involved in the lending process and monitored periodically at the central level.

The internal instruction also includes references to the European Union Taxonomy, used as a classification system for sustainable economic activities at the European level. Although a full assessment of alignment with the Taxonomy requires a detailed analysis of the technical screening criteria and the "Do No Significant Harm" principle, the information collected during the lending process helps improve the bank's ability to monitor its sustainable financing portfolio and meet various reporting requirements.

BT Group's Sustainable Finance Framework

To complement its operational lending policies, the Banca Transilvania Group developed the Sustainable Finance Framework in 2023, which is used to structure and issue sustainable financial instruments, to allocate raised funds to eligible loan portfolios, and to determine the impact of such financing on the environment, the economy, and society.

Based on this framework, Banca Transilvania and its subsidiaries can issue a wide range of sustainable financial instruments, including:

- green financing instruments;
- social finance instruments;
- sustainable financing instruments.

The framework is aligned with the main international standards used in capital markets for sustainable financing, including:

- Green Bond Principles (ICMA)
- Social Bond Principles (ICMA)
- Sustainability Bond Guidelines
- Green Loan Principles (LMA)
- Social Loan Principles (LMA)

In accordance with these standards, the framework is structured around four fundamental components:

1. Use of Proceeds – defining categories of eligible projects;
2. Project evaluation and selection process – establishing criteria and responsibilities for including projects in the eligible portfolio;
3. Management of Raised Funds – monitoring the allocation of raised funds to the eligible loan portfolio and managing, where applicable, unallocated funds;
4. Reporting – periodic publication of information regarding the allocation of funds and the impact of financed projects.

Funds raised through sustainable financing instruments are used to finance or refinance a portfolio of eligible loans. To avoid double-counting of impact, the portfolio excludes financing that has already been supported by similar financing provided by international financial institutions.

To ensure transparency toward investors and other stakeholders, the BT Group periodically publishes documents regarding the implementation of the framework, including:

- The BT Group's Sustainable Finance Framework,
- Second Party Opinion issued by an independent agency (Sustainalytics),
- Allocation and Impact Report,
- MSME Impact Report,
- Limited Assurance Report (ISAE 3000) issued by the independent auditor.

The BT Group's sustainable finance portfolio includes both environmental impact financing and social impact financing.

Categories of Green Financing

The BT Group's Sustainable Finance Framework defines the following categories of green financing, based on the ICMA Green Bond Principles (2022) and the LMA/APLMA/LSTA Green Loan Principles (2023):

Green Buildings

This category covers the financing and/or refinancing of the construction, renovation, and/or refurbishment of new and/or existing buildings that meet clear criteria documented through specific certifications.

Renewable Energy

This category covers the financing and/or refinancing of the construction and/or operation of renewable energy, solar, or wind power facilities.

Clean transportation

This category covers the financing and/or refinancing of the purchase, rental, and/or leasing of zero-emission vehicles and/or rail transport, and/or the construction, modernization, maintenance, and/or operation of infrastructure related to zero-emission vehicles and rail transport.

Sustainable agriculture

This category covers the financing and/or refinancing of organic farming certified in accordance with European Union or national regulations.

Although there may be overlaps between the green categories under the Sustainable Finance Framework for capital market operations and the green categories under the internal methodology, particularly in the areas of green buildings or renewable energy, eligibility criteria are closely monitored and adhered to in order to ensure their fulfillment at each reporting date, within the allocation and impact reports.

Social Impact Financing Categories

The BT Group's Sustainable Finance Framework defines, in addition to green financing categories, social financing categories that support inclusive economic development and improve access to essential services for the population.

These categories are defined in accordance with the ICMA Social Bond Principles (2023) and the LMA/APLAM/LSTA Social Loan Principles (2023) and allow funds raised through social bonds to be used to finance or refinance projects that generate measurable social benefits for specific target groups or communities.

The main types of eligible social financing described in the Sustainable Financing Framework include:

Supporting entrepreneurship and job creation

This category focuses on financing small and medium-sized enterprises, including startups and companies in early stages of development, with the aim of supporting job creation and retention and the development of productive economic activities.

In line with the BT Group's business strategy and market positioning, this category is addressed in a granular manner, through the financing of microenterprises and small and medium-sized enterprises, including companies owned by women or young entrepreneurs, as well as independent farmers. Special attention is given to entities operating in areas with lower levels of economic development, including NUTS 2 regions with per capita GDP below the national average and below 75% of the European Union average.

This category contributes to achieving Sustainable Development Goals 1 – No Poverty, 5 – Gender Equality, 8 – Decent Work and Economic Growth, and 10 – Reduced Inequalities, particularly by supporting productive activities, entrepreneurship, and facilitating access to financial services.

Access to essential services

The framework also includes funding aimed at improving access to essential services for the population, such as health and education infrastructure and services. This funding may target the development or modernization of medical facilities, educational infrastructure, or other services that contribute to improving quality of life and developing human capital.

This category contributes to achieving Sustainable Development Goals 3- Good Health and Well-being, 4- Quality Education, and 10- Reduced Inequalities.

By including these social categories, the Sustainable Financing Framework enables the BT Group to direct capital toward both investments with a positive environmental impact and projects that help reduce inequalities, support entrepreneurship, and improve access to essential services.

The sustainable bonds issued by Banca Transilvania starting in 2023 represent allocations of funds raised both for financing/refinancing projects that meet the criteria in the green categories and for financing/refinancing projects that meet the criteria in the social categories. In this way, a positive impact is ensured on both the environment and the economy and society.

Sustainable products for individuals

In addition to sustainable financing for businesses, the BT Group also offers products for individuals, designed to support the purchase of more energy-efficient homes and the adoption of consumption solutions with a low environmental impact.

A relevant example is green mortgages, designed for the purchase of homes with high energy performance or that meet superior energy efficiency standards. Through these

products, the bank supports customers' access to more energy-efficient homes and contributes to reducing emissions associated with the residential sector.

The bank is also developing dedicated offers and incentives for the purchase of sustainable products and services through commercial partners, thereby encouraging responsible consumption behaviors and increasing the use of technologies with a low environmental impact.

Through these solutions, the BT Group aims to expand public access to financial products that support the transition to a more energy-efficient and sustainable consumption model in the long term.

Integrating ESG criteria and the EU Taxonomy into the lending process

In addition to developing sustainable financing products, the BT Group is progressively integrating sustainability criteria into its lending and risk management processes. This approach reflects the bank's commitment to supporting the transition to a sustainable economy and to appropriately managing risks associated with climate change and other ESG factors.

When analyzing financing provided to corporate clients, the bank considers, where relevant, aspects related to the impact of the financed activities on the environment and society, as well as the potential risks associated with them. The assessment of these elements is part of the broader risk analysis process and contributes to a better understanding of the risk profile of the client and the financed project.

The integration of ESG criteria into the lending process includes, among other things:

- assessing the ESG risks associated with financed projects;
- analyzing the potential impact of financed activities on the environment and natural resources;
- identifying investments that contribute to environmental or social objectives;
- monitoring the loan portfolio from the perspective of exposure to ESG risks.

For financing that can be classified as sustainable financing, the bank uses the internal methodologies described above to assess project eligibility and classify them based on the type and impact of the investment.

At the same time, considering developments in the European regulatory framework on sustainable finance, the BT Group analyzes the extent to which financed activities can be aligned with the criteria established under the European Union Taxonomy. The assessment of alignment with the Taxonomy contributes to increased transparency regarding the impact of the loan portfolio and provides a clearer picture of exposures associated with economic activities that have an environmental impact.

ESG Risk Analysis

The Bank develops and maintains an internal system for classifying environmental (including transition and climate), social, and governance risks, through which each activity, reported at the CAEN code level, is assigned an implicit risk level for each ESG factor. The best available sources, such as specialized studies, publications, official documents, databases, and recommendations from international financial institutions (e.g., EBRD, IFC), are used to determine these implicit risk levels. This system forms the basis for integrating ESG criteria into internal credit and risk management processes.

The portfolio classification and distribution across the seven risk classes for each of the five pillars (physical climate risk, transition risk, environmental risk, social risk, and governance risk) are presented in the tables below.

Calculated climate risk – year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	8%	30%	33%	25%	4%	1%	0%	100%
B. Mining and quarrying	44%	1%	22%	10%	22%	1%	0%	100%
C. Manufacturing	0%	4%	9%	36%	28%	21%	2%	100%
D. Electricity, gas, steam and air conditioning supply	1%	17%	14%	35%	22%	11%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	1%	5%	11%	43%	40%	0%	100%
F. Construction	0%	3%	12%	26%	36%	20%	4%	100%
G. Wholesale and retail trade	0%	1%	5%	23%	42%	23%	6%	100%
H. Transportation and storage	0%	4%	12%	48%	30%	5%	1%	100%
I. Accommodation and food service activities	0%	8%	15%	22%	42%	12%	1%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	1%	25%	31%	23%	21%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	3%	81%	16%	100%
L. Financial and insurance activities	0%	1%	1%	12%	41%	27%	18%	100%
M. Real estate activities	0%	1%	6%	9%	30%	31%	24%	100%
N. Professional, scientific and technical activities	0%	1%	5%	11%	21%	50%	12%	100%
O. Administrative and support service activities	0%	5%	2%	27%	45%	6%	16%	100%
P. Public administration and defence; compulsory social security	0%	0%	0%	45%	15%	10%	30%	100%
Q. Education	0%	14%	26%	24%	22%	13%	1%	100%
R. Human health and social work activities	0%	5%	5%	4%	23%	31%	33%	100%
S. Arts, sports and recreation	0%	0%	1%	11%	36%	34%	18%	100%
Total	1%	6%	10%	23%	27%	27%	7%	100%

Calculated transition risk - year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	0%	1%	13%	79%	7%	0%	100%
B. Mining and quarrying	0%	0%	44%	34%	22%	0%	0%	100%
C. Manufacturing	0%	1%	14%	22%	51%	11%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	4%	7%	36%	53%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	0%	0%	10%	89%	1%	0%	100%
F. Construction	0%	0%	1%	26%	44%	28%	0%	100%
G. Wholesale and retail trade	0%	0%	0%	8%	78%	13%	0%	100%
H. Transportation and storage	0%	0%	1%	64%	22%	13%	0%	100%
I. Accommodation and food service activities	0%	0%	0%	8%	60%	32%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	0%	5%	38%	56%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	82%	18%	0%	100%
L. Financial and insurance activities	0%	0%	0%	1%	19%	80%	0%	100%
M. Real estate activities	0%	0%	0%	7%	19%	73%	0%	100%
N. Professional, scientific and technical activities	0%	0%	1%	5%	32%	57%	6%	100%
O. Administrative and support service activities	0%	0%	0%	43%	40%	17%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	0%	36%	44%	20%	0%	100%
Q. Education	0%	0%	0%	0%	87%	13%	0%	100%
R. Human health and social work activities	0%	0%	0%	5%	25%	69%	1%	100%
S. Arts, sports and recreation	0%	0%	0%	1%	45%	54%	0%	100%
Total	0%	0%	3%	15%	58%	24%	0%	100%

Calculated environmental risk - year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	4%	10%	48%	37%	2%	0%	100%
B. Mining and quarrying	47%	2%	28%	23%	1%	0%	0%	100%
C. Manufacturing	0%	11%	28%	55%	2%	3%	2%	100%
D. Electricity, gas, steam and air conditioning supply	0%	21%	3%	22%	52%	2%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	1%	3%	40%	55%	1%	0%	0%	100%
F. Construction	0%	5%	14%	34%	30%	11%	6%	100%
G. Wholesale and retail trade	0%	2%	8%	32%	18%	40%	0%	100%
H. Transportation and storage	0%	0%	4%	73%	14%	7%	0%	100%
I. Accommodation and food service activities	0%	1%	5%	63%	21%	9%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	3%	16%	22%	27%	31%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	14%	82%	4%	100%

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
L. Financial and insurance activities	0%	0%	0%	15%	24%	19%	42%	100%
M. Real estate activities	0%	1%	6%	15%	3%	16%	59%	100%
N. Professional, scientific and technical activities	0%	0%	2%	13%	32%	34%	19%	100%
O. Administrative and support service activities	0%	0%	0%	66%	13%	21%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	36%	18%	0%	44%	2%	100%
Q. Education	0%	0%	3%	15%	14%	67%	0%	100%
R. Human health and social work activities	0%	0%	1%	11%	7%	67%	14%	100%
S. Arts, sports and recreation	0%	0%	0%	31%	16%	45%	8%	100%
Total	0%	4%	8%	33%	20%	28%	6%	100%

Calculated governance risk – year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	3%	69%	24%	5%	0%	100%
B. Mining and quarrying	0%	3%	4%	81%	12%	0%	0%	100%
C. Manufacturing	0%	5%	19%	40%	27%	8%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	16%	45%	27%	12%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	2%	6%	17%	47%	28%	0%	100%
F. Construction	0%	11%	14%	29%	33%	12%	0%	100%
G. Wholesale and retail trade	0%	3%	4%	35%	49%	9%	0%	100%
H. Transportation and storage	0%	1%	3%	70%	23%	2%	0%	100%
I. Accommodation and food service activities	0%	2%	6%	26%	62%	3%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	4%	11%	48%	37%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	2%	98%	0%	100%
L. Financial and insurance activities	0%	0%	0%	20%	29%	51%	0%	100%
M. Real estate activities	0%	3%	0%	23%	24%	50%	0%	100%
N. Professional, scientific and technical activities	0%	0%	1%	7%	43%	47%	2%	100%
O. Administrative and support service activities	0%	1%	1%	37%	22%	40%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	0%	45%	9%	46%	0%	100%
Q. Education	0%	1%	1%	4%	26%	68%	0%	100%
R. Human health and social work activities	0%	1%	1%	3%	34%	62%	0%	100%
S. Arts, sports and recreation	0%	0%	0%	10%	50%	39%	0%	100%
Total	0%	3%	6%	32%	29%	30%	0%	100%

Calculated social risk – year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	38%	43%	14%	4%	0%	100%
B. Mining and quarrying	3%	0%	54%	42%	1%	0%	0%	100%
C. Manufacturing	0%	7%	24%	57%	7%	4%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	19%	28%	24%	29%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	1%	5%	18%	68%	7%	1%	0%	100%
F. Construction	0%	10%	19%	32%	9%	27%	3%	100%
G. Wholesale and retail trade	0%	1%	5%	52%	21%	22%	0%	100%
H. Transportation and storage	0%	1%	1%	63%	34%	2%	0%	100%
I. Accommodation and food service activities	0%	0%	0%	61%	32%	6%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	7%	7%	21%	64%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	100%	0%	100%
L. Financial and insurance activities	0%	0%	4%	6%	16%	73%	1%	100%
M. Real estate activities	0%	2%	5%	16%	9%	66%	2%	100%
N. Professional, scientific and technical activities	0%	1%	2%	32%	30%	35%	0%	100%
O. Administrative and support service activities	0%	0%	0%	34%	39%	28%	0%	100%
P. Public administration and defence; compulsory social security	0%	36%	0%	19%	0%	45%	0%	100%
Q. Education	0%	1%	1%	78%	19%	2%	0%	100%
R. Human health and social work activities	0%	1%	0%	9%	43%	47%	0%	100%
S. Arts, sports and recreation	0%	0%	1%	7%	61%	31%	0%	100%
Total	0%	2%	11%	37%	16%	33%	0%	100%

Calculated climate risk – year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	5%	42%	27%	21%	3%	1%	0%	100%
B. Mining and quarrying	0%	9%	33%	20%	30%	7%	0%	100%
C. Manufacturing	0%	15%	8%	25%	19%	31%	2%	100%
D. Electricity, gas, steam and air conditioning supply	0%	34%	28%	13%	5%	20%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	2%	7%	18%	10%	63%	0%	100%
F. Construction	0%	5%	19%	32%	23%	18%	3%	100%
G. Wholesale and retail trade	0%	2%	7%	25%	34%	27%	5%	100%
H. Transportation and storage	0%	6%	15%	44%	15%	18%	2%	100%
I. Accommodation and food service activities	0%	7%	18%	20%	28%	26%	2%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	13%	40%	14%	23%	10%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	15%	69%	16%	100%
L. Financial and insurance activities	0%	2%	4%	16%	28%	22%	27%	100%

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
M. Real estate activities	0%	1%	2%	6%	29%	37%	25%	100%
N. Professional, scientific and technical activities	0%	3%	5%	9%	37%	33%	13%	100%
O. Administrative and support service activities	0%	6%	8%	8%	25%	41%	12%	100%
P. Public administration and defence; compulsory social security	0%	3%	0%	56%	15%	17%	10%	100%
Q. Education	0%	14%	24%	36%	16%	11%	0%	100%
R. Human health and social work activities	0%	3%	1%	62%	6%	16%	12%	100%
S. Arts, sports and recreation	0%	1%	0%	13%	34%	32%	20%	100%
Total	0%	10%	11%	21%	21%	30%	7%	100%

Calculated transition risk - year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	0%	0%	15%	76%	8%		100%
B. Mining and quarrying	0%	0%	4%	59%	34%	4%		100%
C. Manufacturing	0%	2%	17%	24%	41%	16%		100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	17%	32%	4%	47%		100%
E. Water supply; sewerage, waste management and remediation activities	0%	1%	1%	71%	23%	5%		100%
F. Construction	0%	0%	2%	40%	41%	17%		100%
G. Wholesale and retail trade	0%	1%	1%	12%	76%	11%		100%
H. Transportation and storage	0%	0%	1%	69%	15%	15%		100%
I. Accommodation and food service activities	0%	0%	0%	6%	68%	26%		100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	0%	1%	35%	64%		100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	93%	7%		100%
L. Financial and insurance activities	0%	0%	0%	5%	23%	72%		100%
M. Real estate activities	0%	0%	0%	8%	20%	71%		100%
N. Professional, scientific and technical activities	0%	0%	1%	7%	45%	39%		100%
O. Administrative and support service activities	0%	0%	0%	37%	36%	28%		100%
P. Public administration and defence; compulsory social security	0%	0%	0%	59%	29%	12%		100%
Q. Education	0%	0%	0%	2%	71%	26%		100%
R. Human health and social work activities	0%	0%	0%	3%	73%	24%		100%
S. Arts, sports and recreation	0%	0%	0%	1%	63%	36%		100%
Total	0%	0%	3%	19%	57%	20%		100%

Calculated environmental risk - year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	4%	9%	47%	38%	2%	0%	100%
B. Mining and quarrying	9%	25%	38%	27%	2%	0%	0%	100%
C. Manufacturing	0%	14%	24%	53%	3%	3%	2%	100%
D. Electricity, gas, steam and air conditioning supply	0%	30%	9%	11%	41%	9%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	2%	8%	24%	66%	0%	0%	0%	100%
F. Construction	0%	7%	25%	29%	13%	19%	6%	100%
G. Wholesale and retail trade	0%	3%	9%	35%	9%	43%	1%	100%
H. Transportation and storage	0%	1%	3%	77%	11%	8%	1%	100%
I. Accommodation and food service activities	0%	1%	2%	60%	20%	15%	1%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	3%	2%	15%	33%	29%	18%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	84%	16%	100%
L. Financial and insurance activities	0%	0%	0%	18%	20%	10%	51%	100%
M. Real estate activities	0%	1%	5%	10%	5%	16%	63%	100%
N. Professional, scientific and technical activities	0%	0%	2%	31%	12%	33%	22%	100%
O. Administrative and support service activities	0%	0%	0%	53%	7%	40%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	56%	13%	0%	30%	1%	100%
Q. Education	0%	0%	5%	34%	2%	59%	0%	100%
R. Human health and social work activities	0%	0%	1%	66%	1%	26%	7%	100%
S. Arts, sports and recreation	0%	0%	1%	29%	6%	56%	8%	100%
Total	0%	5%	10%	34%	12%	32%	8%	100%

Calculated governance risk – year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	8%	74%	16%	1%	0%	100%
B. Mining and quarrying	0%	10%	22%	54%	13%	0%	0%	100%
C. Manufacturing	0%	6%	12%	51%	21%	11%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	9%	27%	13%	19%	31%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	9%	13%	19%	21%	39%	0%	100%
F. Construction	0%	17%	23%	27%	21%	12%	0%	100%
G. Wholesale and retail trade	0%	5%	5%	34%	45%	11%	0%	100%
H. Transportation and storage	0%	1%	8%	52%	16%	23%	0%	100%
I. Accommodation and food service activities	0%	1%	8%	23%	60%	8%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	4%	11%	48%	36%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	99%	0%	100%
L. Financial and insurance activities	0%	3%	7%	21%	11%	59%	0%	100%
M. Real estate activities	0%	3%	3%	15%	25%	54%	0%	100%

N. Professional, scientific and technical activities	0%	0%	1%	12%	29%	54%	3%	100%
O. Administrative and support service activities	0%	0%	6%	35%	2%	58%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	12%	47%	10%	31%	0%	100%
Q. Education	0%	0%	2%	6%	36%	57%	0%	100%
R. Human health and social work activities	0%	1%	1%	6%	73%	18%	0%	100%
S. Arts, sports and recreation	0%	0%	3%	8%	36%	53%	0%	100%
Total	0%	4%	8%	30%	23%	34%	0%	100%

Calculated social risk – year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	40%	43%	10%	6%	0%	100%
B. Mining and quarrying	9%	13%	16%	59%	2%	0%	0%	100%
C. Manufacturing	0%	10%	28%	45%	11%	6%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	15%	32%	15%	37%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	2%	5%	10%	67%	13%	3%	0%	100%
F. Construction	0%	13%	13%	46%	4%	14%	9%	100%
G. Wholesale and retail trade	0%	1%	5%	45%	26%	23%	0%	100%
H. Transportation and storage	0%	1%	2%	56%	38%	3%	0%	100%
I. Accommodation and food service activities	0%	0%	1%	56%	23%	20%	1%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	3%	0%	42%	10%	45%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	100%	0%	100%
L. Financial and insurance activities	0%	0%	5%	6%	17%	64%	7%	100%
M. Real estate activities	0%	2%	2%	15%	7%	71%	2%	100%
N. Professional, scientific and technical activities	0%	0%	3%	29%	28%	39%	0%	100%
O. Administrative and support service activities	0%	0%	0%	20%	34%	46%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	56%	10%	3%	31%	0%	100%
Q. Education	0%	1%	1%	88%	9%	1%	0%	100%
R. Human health and social work activities	0%	0%	1%	66%	16%	17%	0%	100%
S. Arts, sports and recreation	0%	0%	1%	7%	50%	42%	0%	100%
Total	0%	3%	11%	37%	15%	33%	1%	100%

Engaging with customers and supporting the transition

In line with its sustainability strategy and the goal of supporting the economy's transition toward business models with a low environmental impact, the BT Group maintains an ongoing dialogue with entrepreneurs and companies in Romania regarding the opportunities and benefits associated with the green transition and sustainable financing.

In this context, the bank organizes and participates in events dedicated to the business community, designed to facilitate companies' access to relevant information regarding available technical solutions, financing opportunities, and the tools necessary for implementing energy efficiency projects, renewable energy production, and decarbonization.

In 2025, the BT Group organized and hosted several events dedicated to dialogue with companies regarding the transition to sustainable business models, as follows:

In partnership with Servelect, the event "Industry in Transition" (April 15, 2025) took place in Cluj-Napoca, addressing the development and implementation of decarbonization plans and the importance of reducing emissions in the industrial sector.

Additionally, in Bucharest on September 30, 2025, the bank organized the event "VSME for SMEs: Dialogues on Sustainability, Risk, and the Future," aimed at SME clients and dedicated to promoting voluntary sustainability reporting and understanding emerging ESG requirements.

In addition, the NZEB fair, held in two editions during 2025 (June 11–14 and October 23–25), served as an important platform for promoting sustainable construction. During these editions, Banca Transilvania served as the main sponsor, supporting the promotion of the Near Zero Energy Building (NZEB) concept and high-performance green buildings from the perspective of energy efficiency and carbon footprint reduction.

Through these initiatives, the BT Group contributes to raising awareness within the business community regarding sustainable investment opportunities and supports companies in adapting to the requirements of the climate transition and the low-carbon economy.

Evolution of the portfolio of sustainable financing granted to companies

Banca Transilvania's sustainable financing activity has continued to grow at a steady pace, reflecting customers' increasing interest in investments that help optimize energy costs and, by extension, improve business and financial performance. At the same time, these initiatives have a positive impact on the environment by reducing the carbon footprint. The BT Group's approach to financing with a positive impact on the environment is grounded in the realities of the business environment and aligns with customer interest.

In 2025, the total volume of green financing, according to internal methodology, granted to corporate clients increased to 2,180.2 million RON from 1,787.6 million RON in 2024, representing an increase of approximately 22% compared to the previous year and confirming the expansion of financing activities for projects with environmental benefits.

The main categories of funded projects were projects for renewable energy production, the construction of green buildings, and financing dedicated to environmental protection.

Breakdown of green financing provided to companies (in millions of RON)

Category	2025	2024	Variance 2025 vs. 2024	Share in total loans granted in 2025
Renewable Energy	859.4	1,050.3	-18.2%	39.4%
Green Buildings	938.5	516.8	+81.6%	43.0%
Special Environmental Funding	320.5	182.0	+76.1%	14.7%
Other	61.7	38.4	+60.7%	2.8%
Total	2,180.2	1,787.6	+22.0%	100%

In 2025, the structure of green financing granted shows a significant increase in financing for green buildings and special environmental projects (waste collection and recycling, energy storage projects, or grid stabilization, etc.).

The volume of financing for renewable energy projects was lower compared to the previous year, a trend that reflects the specific dynamics of investments in this sector, characterized by projects of varying sizes and an uneven distribution of financing across periods.

The “Others” category includes financing for energy efficiency projects, efficient use of water resources, blue finance projects, and sustainable transportation.

Structure of the green financing portfolio granted to companies (outstanding balance)

At the portfolio level, the total balance of green financing continued to grow, reaching approximately 4.30 billion RON as of December 31, 2025, compared to 2.66 billion RON at the end of 2024.

Category	Balance 2025 (mil.RON)	Balance 2024 (mil.RON)	Variance 2025 vs. 2024	Share in 2025 Balance
Renewable Energy	1,930.1	728,7	+164.9%	44.9%
Green Buildings	1,864.3	1,615.4	+15.4%	43.4%

Category	Balance 2025 (mil.RON)	Balance 2024 (mil.RON)	Variance 2025 vs. 2024	Share in 2025 Balance
Special Environmental Funding	269.1	118.1	+127.9%	6.3%
Other	231.8	193.6	+19.7%	5.4%
Total	4,295.3	2,655.8	+61.7%	100%

The portfolio structure shows a significant concentration in the two main categories, renewable energy and green buildings, which together account for approximately 88% of the total green financing portfolio.

The most significant increase was recorded in financing for renewable energy projects, whose outstanding balance reached 1,930.1 million RON at the end of 2025, compared to 728.7 million RON in 2024. At the same time, financing for green buildings continued to represent a major pillar of the portfolio, with a balance of 1,864.3 million RON.

The evolution of the portfolio balance reflects both the financing granted during the period and the specific characteristics of the financed projects, including their duration and the investment implementation schedule, which determine the progressive use of approved funds. Thus, changes in annual disbursements are gradually reflected in the portfolio structure, and larger investment projects may influence the evolution of balances in subsequent reporting periods.

The evolution of the green financing portfolio is reflected both in the increase in the total financing balance and in the number of financings in the portfolio. As of December 31, 2025, the balance of green financing reached approximately 4.30 billion RON, and the portfolio included 988 financing transactions, of which 418 were granted during 2025. By comparison, as of December 31, 2024, the portfolio balance was 2.66 billion RON, consisting of 734 loans, of which 245 were granted during 2024. This trend reflects the sustained pace of lending during the period under review, as well as the granularity of the supported projects and a low level of concentration at the project level.

The BT Group's Sustainability Strategy for 2026–2028 places the issuance of green loans, in accordance with internal methodology and validated through the CAFI and Green Gateway tools, at the center of its action plans, with a target of granting 6.5 billion RON in green loans during 2025–2028. The initial target for green loans granted to companies was set at 5 billion RON for the 2025–2027 period, reflecting the target set for 2025. The development and promotion of green financing products also aim to meet both the requirements for compliance with the EU Taxonomy and the real needs of the economy, with an emphasis on energy efficiency, reducing CO₂ emissions, utilizing renewable resources, and adapting to climate risks.

Sustainable bonds

Banca Transilvania also utilizes financing instruments from international financial markets to support the development of its sustainable financing portfolio and to mobilize capital for projects with a positive impact on the environment and society. The bank's sustainable bond issuances are structured in accordance with the BT Group's Sustainable Finance Framework described above, with the funds raised being used to finance or refinance eligible projects defined therein.

As part of the issuance program totaling EUR 1.5 billion, Banca Transilvania carried out three consecutive sustainable bond issuances, the first two listed on the Dublin Stock Exchange and the third on the Bucharest Stock Exchange. The first issuance was for EUR 500 million in the form of senior unsecured bonds, followed in September 2024 by a second issuance of EUR 700 million, and in 2025 by a third issuance of EUR 300 million listed on the Bucharest Stock Exchange. The issuances attracted significant interest from international investors with specific mandates for investments that have a positive impact on the environment and/or society, reflecting their confidence in the BT Group's sustainable financing strategy.

The funds raised are directed toward eligible sustainable projects, such as green buildings, renewable energy, clean transportation, and organic agriculture, as well as toward financing small and medium-sized enterprises, including in less developed regions, while also contributing to improved access to health and education services.

Banca Transilvania periodically publishes allocation and impact reports for its sustainable bond issuances, confirming that the funds are used in accordance with the criteria established in the Sustainable Finance Framework.

The first Allocation and Impact Report, published in 2024 for lottery ticket XS2724401588, confirmed the full (100%) allocation of net proceeds through December 31, 2023. The second report, published in 2025, covering issues XS2724401588 and XS2908597433, confirmed the full (100%) allocation of outstanding sustainable bonds totaling EUR 1.2 billion. The financed projects contributed to the annual avoidance of approximately 847,548 tCO₂e, as well as to generating positive economic effects on gross value added and economic activity in Romania.

For the latest sustainable bond issuance in 2025 with ISIN XS3109437387, the bank is set to publish its third Allocation and Impact Report during the first half of 2026, which will detail the use of the funds raised and the impact of the financed projects.

Complementary reports on the impact of financing provided to SMEs (published in 2024 and 2025) highlight the contribution of this financing to job creation, expanding access to financing for SMEs, and supporting economic activity across various sectors of the Romanian economy.

Trends in sustainable financing in the retail segment

In the mortgage sector, green loans (homes with an EPC A energy performance certificate) saw significant growth, confirming customers' growing interest in homes with high energy performance.

In 2025, green mortgage loans saw significant growth both in volume and as a share of new lending: the value of financing granted reached 1,198.9 million RON, compared to 586.9 million RON in 2024, and the number of green mortgages granted rose to 3,458 (from 1,747 in 2024). From the perspective of the production mix, green mortgages accounted for 19.5% of mortgage loans granted in 2025, compared to 13.2% in 2024, meaning that approximately 1 in 5 newly granted mortgage loans fall into the green category (compared to approximately 1 in 8 in the previous year).

This trend is also reflected in the evolution of the outstanding balance: the balance of green mortgages rose to 2,945.9 million RON at the end of 2025 (from 2,265.4 million RON in 2024), while maintaining a stable share of the total mortgage and real estate loan portfolio (11.9% in 2025 compared to 11.8% in 2024).

Across the entire retail portfolio, green financing reached 2,943.5 million RON in 2025, compared to 2,266.9 million RON in 2024, accounting for 7.5% of the total portfolio (compared to 7.4% in the previous year).

Evolution of green mortgage lending

Indicator	2025	2024
Number of green mortgages granted	3,458	1,747
Value of green mortgages granted (million RON)	1,198.9	586.9
Share of total mortgage loans granted	19.5%	13.2%
Equivalent in loans granted	aproximativ 1 din 5 credite	aproximativ 1 din 8 credite
Year-end green mortgage balance (million RON)	2,945.9	2,265.4
Share of total mortgage and real estate loan portfolio	11.9%	11.8%

Green mortgage loans include financing for the purchase or construction of homes with an EPC A energy performance certificate or equivalent, in accordance with the internal criteria used by Banca Transilvania for classifying green financing in the retail segment. The shares presented in the table are calculated relative to the total mortgage loans granted during

the year (for new production indicators) and to the total mortgage and real estate loan portfolio outstanding at the end of the period (for portfolio balance indicators).

Contribution of specialized divisions to portfolio development

Banca Transilvania is strengthening its position in strategic economic sectors, such as the medical and agribusiness sectors, through specialized divisions that offer financial solutions tailored to the specific needs of each sector and contribute to the sustainable development of the loan portfolio.

Specialized divisions are key pillars in BT's portfolio development strategy, ensuring an approach tailored to the specific needs of sectors with significant economic and social impact. Both agribusiness and the medical sector are areas with a structural role in the Romanian economy, characterized by high investment needs and a significant contribution to employment.

The Agribusiness Division continued to play an essential role in supporting the agricultural sector, an area of major relevance to the Romanian economy. In 2025, the division recorded a market share of 26.36%, up from the 21.28% reported at the end of 2024, reflecting the strengthening of Banca Transilvania's position in this segment. As of December 31, 2025, the division's portfolio included 35,606 active customers, and the outstanding loan balance reached 6.83 billion RON. Thus, Banca Transilvania has strengthened capabilities to meet the financing needs of a sector exposed to climate risks and economic volatility.

The size of the portfolio and the high number of active customers highlight the strategic importance of this segment for the Bank's overall portfolio and for supporting the rural economy and agri-food supply chains.

The Corporate Banking Division, in turn, continued to grow, expanding its customer base and covering an increasingly broad range of activities, including those in the large-corporate segment. By the end of 2025, the division served 34,729 companies, compared to 31,933 in the previous year. This growth was reflected in increased lending activity, with new loan origination reaching 1.97 billion RON in 2025, compared to 1.2 billion RON in 2024. At the same time, the outstanding loan balance increased from 2.56 billion RON in 2024 to 2.76 billion RON in 2025, and the deposit balance rose from approximately 2.9 billion RON to 3.1 billion RON, reflecting a strengthened financial relationship with this customer segment.

In the healthcare sector, the growth in the customer base and the volume of new financing granted indicates an intensification of lending activity, supported by ongoing investments in infrastructure equipment, and the expansion of healthcare service delivery capabilities. The positive trend in loan and deposit balances suggests the strengthening of long-term relationships with this customer segment and an increase in the degree of financial intermediation.

Overall, the contribution of the specialized divisions reflects balanced portfolio growth, based both on expanding the customer base and on supporting investments in sectors of high economic and social relevance for Romania. This approach allows Banca Transilvania to strengthen its role as a financier of the real economy and to support the sustainable development of key sectors.

Banca Transilvania has also integrated sustainable financing practices within its subsidiaries.

The subsidiaries of the Banca Transilvania Group contribute to the implementation of the sustainable financing strategy by supporting investments in renewable energy, energy efficiency, and low-emission mobility. Through the activities carried out by Victoriabank and BT Leasing Moldova in the Republic of Moldova, as well as by BT Microfinanțare and BT Leasing Romania, sustainable financing is being extended to new customer segments and project types, strengthening the BT Group's role in supporting the transition to a more sustainable economy in the markets where it operates.

Victoriabank

In 2025, Victoriabank continued to support renewable energy and energy efficiency projects by granting green loans, leveraging Banca Transilvania's expertise and the assistance provided by the European Bank for Reconstruction and Development (EBRD). At the same time, the funding base was diversified through the Green for Growth Fund (GGF) partnership, helping to strengthen the bank's capacity to support investments with a positive environmental impact.

As of December 31, 2025, Victoriabank had financed 14 clients, with a total value of approximately 75 million RON in loans, with the portfolio focused on renewable energy and energy efficiency projects. This development is in line with the strategy to support energy transition, continuing the directions established in previous years.

BT Microfinantare

Through the activities of BT Mic, the Group contributes to expanding access to financing for small businesses and early-stage entrepreneurs. In 2025, approximately 70% of new financed clients received support from the company as their primary lender, and 23.4% of financed clients were startups, defined as businesses no more than 18 months old.

BT Leasing Romania

Through its leasing subsidiaries, the BT Group supports the transition to low-emission mobility solutions, offering customers the opportunity to finance electric and hybrid vehicles, adapted to new energy efficiency requirements and environmental impact reduction goals.

In 2025, BT Leasing Romania made a significant contribution to the development of sustainable mobility, reflected both in the volume of financing granted and in the portfolio structure. Approximately half of the leases granted during 2025 were for electric or hybrid vehicles, with a cumulative value of nearly 1,909 million RON

This trend was also reflected in the portfolio: by the end of 2025, electric and hybrid vehicles accounted for 58% of the total leasing portfolio, confirming the business's consistent focus on low-emission mobility solutions. In terms of the number of financed vehicles, their share increased significantly, highlighting a structural shift in the automotive portfolio, not just a one-off increase in volumes.

In particular, both the electric vehicle segment and the hybrid vehicle segment recorded substantial growth in 2025 compared to 2024, both in terms of the number of units financed and the outstanding balance, consolidating BT Leasing Romania's position as a key player in supporting the transition to low-emission mobility solutions.

The number of electric and hybrid vehicles financed, as well as the outstanding balance of the related financing, are presented in the table below.

Portfolio of financed electric and hybrid vehicles – BT Leasing Romania

Category	2025		2024		Variance number	Variance balance
	No.	(RON mil.)	No.	(RON mil.)	2025 vs 2024	2025 vs 2024
Electric cars	3,115	267	2,383	208	+30.7%	+28.4%
Hybrid cars	19,630	2,164	13,463	1,495	+45.8%	+44.7%
Total	22,745	2,431	15,846	1,702	+43.5%	+42.9%

BT Leasing Moldova

In 2025, BT Leasing Moldova continued to develop a portfolio focused on low-emission mobility solutions by financing electric and hybrid vehicles and actively promoting these solutions among customers. This approach reflects the subsidiary's commitment to supporting the modernization of the vehicle fleet and reducing environmental impact, particularly in urban areas.

The partnership with the Green for Growth Fund (GGF) was strengthened, facilitating access to resources dedicated to projects with a positive environmental impact and supporting the development of sustainable mobility. At the same time, the launch of the Leasing ECO product, active since 2025, contributed to increasing green financing in the portfolio and stimulating demand for electric and hybrid vehicles.

The portfolio's growth was reflected both in the increase in the number of financed vehicles and in the rise in the outstanding balance of related financing. At the end of 2025, electric

and hybrid vehicles accounted for 37% of the auto portfolio balance, compared to 35% in 2024, and in terms of the number of units financed, their share increased from 27% to 33%. This trend indicates a progressive shift of the portfolio toward sustainable mobility solutions, with an increasingly significant contribution from the green segment to BT Leasing Moldova's operations.

The number of financed electric and hybrid vehicles, as well as the outstanding balance of the related financing, are presented in the table below.

Portfolio of financed electric and hybrid vehicles – BT Leasing Moldova

Category	2025		2024		Variance number	Variance balance
	No.	(RON mil.)	No.	(RON mil.)	2025 vs 2024	No.
Electric cars	102	8	56	5	+82.1%	+60.0%
Hybrid cars	559	57	488	49	+14.5%	+16.3%
Total	661	65	544	54	+21.5%	+20.4%

Green and social projects supported by BT

1. Green buildings and sustainable urban development

Alecsandri Estates - The Landmark, București

Alecsandri Estates S.R.L. is a project company within the Vectr group, which owns and manages The Landmark office complex, located in the ultra-central area of Bucharest. The project is recognised on the local office market as a landmark asset, with high potential for modernisation and improved operational and sustainability performance.

Banca Transilvania granted financing through which it took over the existing exposure to the project, facilitating a more efficient use of internal resources at Vectr group level. This financing created the necessary framework for accelerating an extensive technical and operational transformation process, supporting significant investments aimed at improving the asset's ESG performance.

Following this modernisation process, The Landmark complex became a benchmark for sustainability and performance on the Romanian office market, obtaining the BREEAM In-Use – Outstanding certification, with a score of over 88% (6 stars), for both the Asset and Management components, as well as the WELL Health-Safety certification, which confirms high standards of health, safety and well-being for occupants.

BE STRONG TENNIS – Atlas Academy

BE STRONG TENNIS is a company operating in the field of sports services and leisure activities, with a focus on tennis and football. In 2018, the company established ATLAS Academy, a tennis academy dedicated to training children and young people aged between 3 and 15, as well as providing a high-quality sports experience for adults passionate about tennis. Starting with 2019, the activity was expanded through the launch of the Football Academy, where children aged between 5 and 12 are trained. The academy benefits from the sporting expertise of Emil Săndoi, a renowned athlete, who holds the role of honorary president and coordinating coach.

The academy's activity includes performance assessment of participants, the development of individual training plans and participation in local and national competitions, carried out within a sports infrastructure that includes two tennis courts and two football/foot-tennis courts, as well as equipment dedicated to sports training.

The investment project supported by Banca Transilvania through financing aims at the development of a new building for a multifunctional sports centre, designed as a modern space dedicated to promoting health and well-being within the local community. The centre will provide accessible, high-quality sports and recreational facilities for a broad audience and will act as a catalyst for the development of sports activities and social interaction.

The building is designed as a green building, with energy performance exceeding the NZEB standard, conceived not only as a training facility but as a community hub that contributes to improving quality of life, encourages an active lifestyle and supports the development of sports talent among children and young people.

Viva Residence – green residential project

Viva Residence is one of the most dynamic residential developments in the southern area of Bucharest, located near Tudor Arghezi Park and the Apărătorii Patriei metro station. The project stands out through well-designed functionality and an efficient layout of buildings, reflecting the developer's vision of creating a sustainable, spacious, comfortable and safe residential community, harmoniously integrated into the urban environment.

Banca Transilvania granted an investment loan for the development of a new residential project, designed as a model for modern housing in Romania. The project is green pre-certified by the Romanian Green Building Council (RoGBC), a certification that confirms the integration of advanced construction and technological solutions aimed at energy efficiency and reducing environmental impact.

The residential complex benefits from an enhanced construction system, including high-performance building insulation, the use of renewable energy through photovoltaic panels installed on rooftops, underfloor heating systems and energy consumption monitoring. In

addition, the project integrates large glazed surfaces, LED lighting and electric vehicle charging stations, addressing the needs of residents adopting modern housing and mobility solutions. Through these features, Viva Residence contributes to the development of an energy-efficient living environment oriented towards long-term quality of life.

2. Sustainable transport and green logistics

Railport Arad – intermodal terminal

Railport Arad is the first container terminal in Romania, inaugurated in September 2009, following a significant investment in logistics infrastructure. The terminal is located in Curtici, near the Hungarian border, on the Pan-European Orient / East-Med corridor (RFC7), and covers an area of over 10 hectares. Through its strategic positioning and dedicated infrastructure, Railport Arad provides a viable solution for combined transport, contributing to the development of intermodal traffic and promoting a more efficient and less polluting transport alternative, in line with the European objective of shifting freight flows from road to rail.

The financing granted in 2025 by Banca Transilvania primarily aimed to overcome existing capacity constraints and increase the terminal's operational efficiency, with a direct impact on the sustainability of intermodal transport in the region. The investment targeted the extension of five railway lines and two shunting lines, enabling the operation of trains with a length of up to 740 metres, as well as the implementation of digital solutions for workflow automation, aimed at optimising operational processes.

At the same time, the project included equipping the terminal with a photovoltaic system for the generation of energy from renewable sources, contributing to improved energy efficiency and the reduction of the carbon footprint of the activities carried out. Through these investments, Railport Arad strengthens its role as a key infrastructure for sustainable intermodal transport and supports the transition towards more efficient and environmentally friendly logistics solutions.

3. Renewable energy

Baboia Solar Plant – photovoltaic power plant

The ENERY Group is one of the leaders in the Romanian market in the transition towards green energy, through the acquisition, development, construction and operation of large-scale renewable energy power plants. The Group, with 98 sites, has an operational portfolio of 566 MW and provides clean and reliable electricity to a wide range of communities, companies and utilities.

At the same time, it is developing greenfield projects in other Central and Eastern European markets, in countries such as the Czech Republic, Slovakia, Bulgaria, Austria, Estonia and Latvia.

Baboia Solar Plant, part of the ENERY Group, is developing in Romania a large-scale photovoltaic power plant located in Ogrezeni, Giurgiu County. The financing provided by Banca Transilvania is part of a syndicated loan aimed at developing 761 MWp of installed capacity and over 1,000 MWh of storage capacity. The ENERY Group's investments in Romania include 9 photovoltaic plants, 4 wind farms and 2 hydropower plants, totalling over 205 MW of installed capacity.

Nova Power & Gas – energy storage project

Nova Power & Gas, a 100% Romanian company, electricity producer and supplier of natural gas and electricity, is one of the pillars of the E-INFRA Group, alongside Electrogrup, Direct One, Netcity and WESEE. Together, the group of companies provides some of the most advanced infrastructure services in energy, telecommunications, construction and energy solutions for sustainable cities in Romania. The Group has production capacities with an installed capacity of over 500 MW, while production from renewable sources alone exceeds 350 GWh per year.

The investment financed in 2025 aims at the financing/refinancing of the largest energy storage facility in Romania, located in Florești, with a storage capacity of 200 MW / 400 MWh.

The company's plans until 2028 include the development of a new 160 MW combined cycle gas power plant and the development of new energy storage facilities with a capacity of 600 MW / 1,200 MWh.

4. Special environmental and circular economy financing

Ecosistem SRL

Ecosistem SRL is a company based in Vrancea County, with over 20 years of activity, specialized in the recovery and treatment of recyclable materials. The company manages a wide range of waste streams, including cardboard, paper, plastic, wood, metal, glass and waste electrical and electronic equipment (WEEE). Within its operational platform, activities such as collection, sorting and volume reduction of waste through shredding or pressing are carried out, representing preliminary steps necessary to prepare materials for recycling. Through its operations, Ecosistem SRL contributes annually to reintroducing over 10,000 tonnes of materials into the economic cycle, which would otherwise be disposed of as waste.

The financing provided by Banca Transilvania supported an investment program implemented under a project financed through the National Recovery and Resilience Plan (NRRP), in the form of investment loans used as co-financing. The project aimed at constructing new production facilities and equipping them with technological equipment dedicated to waste recycling, including weighing systems, sorting and drying lines for LDPE/LLDPE plastic waste, granulation lines and shredding equipment. In addition, the investment included the installation of photovoltaic systems with a capacity of 176 kW, supporting the use of renewable energy in operational activities.

Complementing these investments, the company also contracted a working capital loan guaranteed by the European Investment Fund, ensuring operational continuity and stability of business flows. Through these financings, Ecosistem SRL strengthens its capacity to transform waste into reusable raw materials and contributes to the development of the circular economy, with a positive impact on the environment and resource efficiency.

MINET S.A.

Founded in 1981, MINET S.A. is the largest nonwoven textiles producer in Romania, with fully Romanian capital and part of the Minet Group. The company holds a strong market position, with its products being used across a wide range of industries, including construction (underground drainage systems, geomembrane protection in waste storage, anti-erosion barriers in flood-prone areas), furniture manufacturing, cosmetics (wet wipes), and the textile industry (fillings for pillows and duvets, quilted materials).

The investment loans granted aim to support the development of a dedicated textile waste recycling facility, with the primary objective of valorizing recycled materials by integrating at least 50% recycled content into the manufacturing process of finished products. Textile waste is highly polluting and rarely recycled, and MINET S.A.'s activity is expected to make a significant contribution to the development of the circular economy in Romania.

The investment includes the construction of a production hall and the acquisition of equipment based on Best Available Technology (BAT), featuring integrated systems for operation, monitoring and intervention, IoT-enabled technologies and a high level of automation. The facility and equipment will be powered by a 100 kW rooftop photovoltaic system, supporting energy efficiency in the production process.

Professional Recycle

Established in 2010, Professional Recycle is one of Romania's leading companies in the plastic recycling sector, specializing exclusively in PET recycling. Through a business model focused on quality, professionalism and strong partnerships with external stakeholders, the company has rapidly established itself in the market and contributed to the development of an efficient value chain for recyclable materials. Its focus on PET recycling reflects the superior efficiency of this process in terms of resource use and climate impact: producing

a bottle from recycled PET requires approximately 75% less energy compared to virgin material, and each tonne of recycled PET (rPET) avoids around 1.5 tonnes of CO₂ emissions compared to producing an equivalent amount of new PET.

Banca Transilvania provided a working capital loan to support the smooth functioning of the entire recycling chain, from collection to processing and reintegration of recycled raw materials into production. This financing supports the company's operational continuity and the efficiency of recycling flows, contributing to the strengthening of the circular economy.

Professional Recycle's activity is closely linked to the Deposit Return System (DRS) in Romania, managed by RetuRO, which represents the main source of PET packaging collected for recycling. In this context, the company's investment plans, aimed at doubling its recycling capacity, will accelerate the valorisation of collected materials and support the reduction of environmental impact through the reuse of recycled PET as a raw material.

Romcarbon SA

Romcarbon S.A. is a joint-stock company based in Buzău County, listed on the Bucharest Stock Exchange under the symbol ROCE, with a long-standing presence in the plastics industry, established in 1952. The company is one of the leading plastic packaging producers in Romania, specializing in the processing of polyethylene, polypropylene, PVC and polystyrene. Romcarbon's operations are certified in accordance with ISO 9001 and ISO 14001 standards, while its recycling activities are certified under EuCertPlast, the European certification scheme for plastics recyclers. Since 2012, the company has complemented its packaging production activities with a dedicated post-consumer plastic waste recycling segment, contributing to the transition towards a circular economy. Its operations are organized across several business lines, including the production of automotive filters, respiratory protection equipment (gas masks and industrial masks), plastic films and bags, as well as road signage.

The financing provided by Banca Transilvania supported the implementation of a project co-financed through the National Recovery and Resilience Plan (NRRP), with the main objective of establishing a modern facility for recycling and recovery of plastic waste. The investment loans were used for the acquisition of technological equipment to be installed in the new unit, including the replacement of existing sorting and washing lines for plastic fractions, modernization of waste sorting and shredding processes, and the implementation of solutions for treating wastewater generated during recycling operations. The investment also includes the installation of an extruder for recycling shredded polypropylene and polyethylene films and bags, contributing to increased efficiency and processing capacity of recycled materials.

The recycling of post-consumer plastic waste represents a strategic priority at the European Union level. The Regulation on packaging and packaging waste sets ambitious targets, including for Romania, such as the requirement that by 2030, polypropylene and

polyethylene packaging must contain at least 35% recycled material, as well as restrictions on placing certain non-recyclable packaging on the market. Romcarbon's investments in modernization and expansion of recycling capacities directly address these regulatory requirements, contributing to increased material circularity and reduced environmental impact.

Social impact financing – healthcare sector, Medical Division

Scan Expert

Scan Expert is a medical company specialized in high-performance medical imaging, supporting the local healthcare system by providing fast, accurate and detailed diagnostic investigations. The company's activity is based on the use of state-of-the-art equipment with low energy consumption, complemented by advanced software and IT infrastructure, including AI-based image processing solutions.

The company provides medical imaging services both for emergency care units and on an outpatient basis, with a national presence through its centers located in Iași (two clinics), Pașcani (Iași County), Timișoara (two clinics), Roman, Galați, Brașov and Botoșani (two clinics), including through its group company Optim Diagnostic. This extensive network contributes to improving patient access to advanced imaging services across multiple regions of Romania.

Through financing provided by Banca Transilvania, Scan Expert has continuously expanded its technological capabilities, investing in modern medical imaging equipment such as magnetic resonance imaging (MRI), computed tomography (CT), ultrasound, radiology (X-ray), mammography and colonoscopy. To ensure broad accessibility of its services, the company has contracts in place with local Health Insurance Houses, facilitating patient access to reimbursed advanced imaging investigations. In this context, the development of capabilities and infrastructure dedicated to cardiac imaging represents one of the company's key strategic directions.

In 2025, Banca Transilvania financed the acquisition of state-of-the-art equipment enabling both standard and specialized imaging investigations, including:

- Cardiac stress MRI (myocardial perfusion with adenosine);
- Pelvic MRI with dedicated protocols for accurate diagnosis of endometriosis;
- MRI with sedation for pediatric patients;
- Digital mammography with 3D tomosynthesis.

Among the key equipment financed in 2025 are:

- Siemens MAGNETOM Vida 3 Tesla MRI, a high-performance system equipped with BioMatrix technology, designed to automatically adapt to each patient's anatomical and physiological variability;
- Siemens MAGNETOM Sola 1.5 Tesla MRI, built on a high-performance platform integrating power, intelligence and processing speed;
- Siemens MAMMOMAT Revelation mammography system, enabling full 3D breast imaging through wide-angle (50°) tomosynthesis technology.

Through these investments and the integration of advanced imaging technologies, Scan Expert contributes to improving the quality of medical services, reducing diagnostic time and enhancing patient access to high-precision healthcare, supporting the development of a modern and efficient medical infrastructure.

Onco Systems SRL – Regional Institute of Oncology Iași

Onco Systems is a company specialized in the provision and implementation of integrated solutions for radiotherapy and oncology, operating in the high-technology medical equipment market. The company collaborates with leading international manufacturers and with both public and private medical institutions in Romania, contributing to the modernization of oncology infrastructure at national level.

Through its technical expertise and experience in complex projects, Onco Systems delivers end-to-end services, including equipment supply, installation, commissioning, medical staff training and specialized maintenance.

In 2025, Banca Transilvania provided financing to Onco Systems SRL for the implementation of a project aimed at equipping the Regional Institute of Oncology Iași (IRO Iași) with the RADIXACT radiotherapy platform developed by ACCURAY, a state-of-the-art technology designed for advanced cancer treatment.

The RADIXACT system, equipped with SYNCHRONY technology, is among the most advanced radiotherapy platforms available globally. It integrates cutting-edge treatment planning and delivery technologies, enabling real-time adaptation to tumor position and movement, thus ensuring highly precise targeting of tumor formations. This technology enhances treatment effectiveness, reduces associated complications and improves long-term therapeutic outcomes, with a direct impact on patients' quality of life and survival rates.

The financing supports:

- Acquisition of the full RADIXACT system;
- Development and compliance of technical facilities;
- Installation and integration within the existing infrastructure of IRO Iași;

- Commissioning and clinical implementation;
- Training of medical personnel for the use of new technologies;
- Related services and technical support;
- VAT associated with the import of the equipment.

The investment contributes to increasing oncology treatment capacity in the North-East region by modernizing the Radiotherapy Laboratory within IRO Iași and equipping it with high-performance technology. The project will enable the Institute to provide more precise and effective treatment services, align with advancements in medical practice and respond adequately to the complex needs of oncology patients.

The project generates significant social impact through:

- Increased access to high-quality medical services for oncology patients in the North-East region, enabled by the local availability of advanced radiotherapy technology;
- Improved precision and effectiveness of treatments, directly contributing to enhanced quality of life and improved survival rates;
- Modernization of the public healthcare system's technological base and alignment with international standards;
- Strengthening the role of the Regional Institute of Oncology Iași as a regional center of excellence in oncology care.

RETINA Clinic

RETINA Clinic was established in 1998 by Prof. Dr. Florian Baltă and was conceived as a reference medical unit in the field of ophthalmology, built on professional expertise, medical rigor and respect for patients. Over time, the clinic has consolidated its reputation through reliability, professionalism and consistent medical performance, with a mission to provide ophthalmological services at the highest standards and to maintain patients' health as a central priority in medical practice.

In 2025, Banca Transilvania provided financing for the acquisition of the property in which RETINA Clinic operates, supporting the consolidation of a modern medical facility adapted to current ophthalmology requirements and patient needs. This financing contributed to ensuring a stable and high-performance environment for the delivery of medical services, supporting the continuity and development of the services provided.

The clinic is organized across four levels, ensuring an efficient and integrated medical flow. Activities are carried out within a modern outpatient facility, equipped with eight consultation rooms fitted with state-of-the-art medical equipment, as well as two fully equipped operating theatres dedicated to ophthalmic interventions. At ground floor level, the optical shop complements the clinical pathway by offering personalized optical

solutions and specialized advisory services, contributing to the provision of a comprehensive service package for patients.

Medical expertise is supported by a team of 23 physicians, providing consultations and treatments for both children and adults, covering a wide range of specialties, including surgical and medical retina, glaucoma, cataract, uveitis and ocular inflammation, oculoplastics, pediatric ophthalmology and neuro-ophthalmology. Through its modern infrastructure and the expertise of its medical team, RETINA Clinic contributes to improving access to specialized medical services and to enhancing the quality of ophthalmological care.

Transilvania Medical Center – Transilvania Hospital

Transilvania Medical Center represents the first Danish private investment in the medical sector in Romania and is a member of the Danish-Romanian Business Association. The organization has established itself as one of the leading providers of magnetic resonance imaging (MRI) services in Cluj-Napoca, supported by high-performance equipment and a team of highly qualified radiologists.

Transilvania Hospital, developed as an integral part of this medical ecosystem, has become a benchmark both regionally and nationally since its opening, offering comprehensive and complex services, including outpatient consultations, laboratory testing, advanced medical imaging, surgical interventions and inpatient care. The building was designed and constructed from the outset as a hospital facility, with integrated infrastructure, medical equipment and operational layouts forming a unified system aimed at supporting medical excellence and high standards of care.

The hospital was built from the ground up, covering an area of approximately 2,500 sqm, and is designed to ensure efficient medical flows for both patients and medical staff, as well as a functional and comfortable environment. Its inpatient capacity allows for the simultaneous hospitalization of 44 patients, accommodated in single or double rooms. State-of-the-art technology is integrated across both the operating block and imaging infrastructure, with all equipment being of advanced standard.

The hospital is structured across six functional levels, as follows:

- Basement: staff facilities, technical equipment areas and the 3T MRI Imaging Center;
- Ground floor: emergency unit, patient reception, CT Imaging Center, elevator area and admissions office;
- 1st floor: conventional radiology (X-ray) center, RENAR-accredited laboratory, consultation rooms and inpatient wards;
- 2nd floor: inpatient wards;

- 3rd floor: operating block with two operating theatres, biplane angiography system for interventional radiology, sterilization area and Intensive Care Unit;
- 4th floor: administrative area, meeting rooms and medical rehabilitation facilities.

In 2025, Banca Transilvania provided an investment loan for the acquisition of a 4th-generation da Vinci® X 3D-HD robotic surgical system with four arms, including a full package covering installation, space assessment and servicing. The financing supported the implementation of a Robotic Surgery Program, based on a multidisciplinary approach (general surgery, urology, gynecology and thoracic surgery), involving three surgical teams enrolled in a Continuous Training Pathway, proctoring sessions and complementary equipment such as the AirSeal Intelligent Insufflator, DORA – OR Assistant and dedicated endoscopes.

Robotic surgery is a minimally invasive technique in which the surgeon controls a robotic system to perform highly precise interventions. The da Vinci technology accurately replicates the surgeon's movements and enables procedures in complex anatomical areas, offering enhanced control, visibility and safety, reducing the risk of complications and optimizing post-operative recovery. Through the introduction of this technology, Transilvania Hospital provides patients with access to complex surgical procedures performed with a high level of precision, safety and comfort, further strengthening its position as a provider of high-quality medical services.

Green and social projects supported by Victoriabank

In line with its commitment to supporting the transition towards a sustainable, low-carbon economy, Victoriabank continued in 2025 to provide dedicated financing for green projects, with a focus on developing renewable energy generation capacities. Through these financings, the bank supported relevant investments in the energy sector, contributing both to the expansion of local clean energy production and to the modernization of the energy infrastructure in the Republic of Moldova.

The financed projects include:

- Delta Green Energy SRL, which received financing for the acquisition and installation of two Enercon E-70 wind turbines, with a total installed capacity of 4 MW;
- Mistral Tours SRL, beneficiary of financing for the development of a photovoltaic park with a capacity of 1,000 kW;
- Doni Cons SRL, which obtained financing for the construction of a photovoltaic park with a capacity of 1,500 kW, including the acquisition of equipment and related services.

By supporting these projects, Victoriabank contributes to the development of renewable energy generation capacity, the reduction of carbon emissions and the strengthening of energy security. At the same time, the financed investments facilitate the adoption of

modern technologies, reduce dependence on conventional energy sources and support the sustainable development of local communities.

3.4 Entrepreneurial Education and Financial Education

Entrepreneurship education is an essential pillar for the sustainable development of companies, as it provides the tools necessary for efficient resource management, reducing financial risks, and maximizing long-term performance. By strengthening these skills, organizations can enhance their resilience and competitiveness in a constantly changing economic environment. For individual customers, financial education is equally important, helping to build the ability to make informed decisions regarding saving, investing, and responsible spending. This supports personal financial stability and, at the same time, the ability to actively participate in the modern economy. By providing these educational resources to both the business community and the general public, the BT Group contributes to the development of a robust economic ecosystem, supporting individuals in acquiring the skills necessary for effective financial management and for launching sustainable entrepreneurial projects. In this way, the BT Group assumes the role of a facilitator of responsible economic growth and financial inclusion at the national level.

STUP

The STUP project, developed by Banca Transilvania and BT Microfinanțare IFN (BT Mic), represents a unique benchmark in the Romanian entrepreneurial landscape, offering continuous entrepreneurial education through practical programs, thematic modules, and dedicated resources. Unlike other initiatives in the market, STUP stands out for its integrated approach, where each member benefits from relevant training focused on direct business application, with the support of the best specialists and partners in the field.

Free access to the STUP community is a fundamental pillar: any entrepreneur or aspiring entrepreneur can participate in workshops, courses, and events and has access to educational resources at no cost, regardless of whether or not they are a client of the BT financial group. This open framework transforms STUP into an inclusive space where continuous education and the exchange of experiences are accessible to everyone, regardless of the stage of their business or their relationship with the BT Group.

Personalized consulting, networking opportunities, and benefits offered by partners are made available to members at no additional cost to STUP. In essence, STUP becomes a true “one-stop shop” where entrepreneurs can find support for their business development, access financing, exchange ideas, and build valuable connections for the future.

STUP is, thus, a framework where entrepreneurs can come to learn, identify potential partners, access financial resources, and connect with other members of the entrepreneurial community who share a mindset focused on growth and sustainable development. The project functions as a genuine ecosystem, built to stimulate business development and strengthen Romania’s entrepreneurial community. The activities carried out, ranging from seminars to consulting services, are designed to address the real needs

of entrepreneurs, providing a cohesive framework for development, connection, and growth.

STUP is a platform dedicated to supporting entrepreneurs, offering access to entrepreneurial and financial education programs, workshops, seminars, consulting, networking opportunities, and specialized resources. By integrating these components into a unified framework, the initiative contributes to the development of entrepreneurial skills and supports the business environment in Romania. In 2025, the entrepreneurial education programs continued under the umbrella of “Avânt din Stup,” as follows:

- The “**Avânt în antreprenoriat**” program – 8 editions by the end of 2025; the program offers a “journey” across 10 sessions, based on the Business Model Canvas, which guides participants through the main areas of a business: understanding the market and customers, the sales process, the marketing plan, financial information, as well as calculating basic financial indicators and creating a cash flow projection for the coming period;
- The “**Sales Boost**” program - structured into 6 modules - offers the opportunity to gain an in-depth understanding of the entire sales process, from prospecting and qualifying potential customers to identifying their needs and through the negotiation process; 7 groups have already benefited from this program;
- The “**Boost in Finance**” program, across its four editions, has brought together entrepreneurs eager to learn practically how to calculate and interpret the key financial indicators of their business, fully identify expenses, and efficiently allocate profits (based on the “Profit First” method), distinguish between Cash Flow and P&L, and plan for sustainable business growth.
- The “**Avânt în digital marketing**” program - which has run for three editions under the umbrella of the “Avânt din Stup” programs - is a practical program designed for entrepreneurs who want to attract new customers and better understand how performance media works, how to implement campaigns on Google Ads and Meta Ads, and how to analyze campaign results.

INFO	2024	2025
Total number of event participants	8,872	9,712
Total number of STUP events	264	318
Facilitating access to non-financial business solutions	3,825	3,859
STUP Community (number of accounts opened on the platform)	30,705	40,393

Financial education programs for the community

„FIT - Finanțe pe Înțelesul tuturor”

In a context where financial education remains a structural challenge in Romania, with over 30% of Romanians being financially illiterate and only 10% possessing basic financial skills, according to the 2023 Eurobarometer, Banca Transilvania maintained its firm commitment in 2025 to driving change through the FIT program: Finance for Everyone. Launched in 2023, FIT has gradually become more than just a project: a national financial education infrastructure, built to bring clarity where the numbers show the greatest need.

2025 was the year in which FIT consolidated its presence and impact, developing a balanced mix of digital content, offline interactions, and community engagement. The program continued to translate complex financial concepts into simple, accessible, and useful explanations: a necessary step in a country where questions such as “how do you save?”, “how does interest work?”, or “what is the difference between investing and spending?” still lack clear answers for a large portion of the population.

Following the success of the “De Toți Bani” series, 2025 brought an expansion of the FIT universe into the online space with the launch of additional content from the “Descifrat.” series. Featuring creators and guests highly relevant to young audiences - from Selly and Denisa Tănase to Ianis Hagi and Paul Olteanu - the program continued to explain financial topics in a friendly, modern, and easy-to-consume format. The results confirmed the content’s usefulness and appeal: over 500,000 views on YouTube, 15 million views on TikTok, and another 700,000 on social media.

The FIT online platform is a digital channel through which the bank provides the public with financial education resources, including articles, videos, and interactive tools. Among the available modules is the financial education quiz, which includes the FIT quiz with over 15,000 people entered in the 2025 prize draw and the online safety quiz, which has recorded over 130,000 contest entries, according to reports extracted from the internal Siebel platform. The prizes up for grabs, ranging from smart devices to festival passes, boosted participation, but the real goal was educational: testing and reinforcing financial knowledge.

2025 also marked an intensification of FIT’s presence at major festivals in Romania: an unconventional space for financial education, yet highly relevant to young audiences. FIT thus reached hundreds of thousands of people through dedicated activations at Electric Castle (274,000 attendees), Untold (427,000 attendees), and Beach Please (150,000 attendees). Interactive experiences, educational materials, and live activations transformed financial topics into natural discussions, integrated into contexts familiar to the audience.

In 2025, FIT organized over 400 financial education presentations in elementary and high schools, where over 50,000 educational kits were distributed to the same number of participants.

With over 5 million people exposed to online content, hundreds of thousands of direct interactions, and a constant presence in spaces relevant to the public, FIT has solidified its position as a robust and consistent initiative in the field of financial education in Romania. The program continues to evolve through dedicated projects, updated resources, and nationwide campaigns, providing the public with clear, accessible, and relevant information for a better understanding of personal finance.

A Different Kind of School

Through **Școala Altfel**, colleagues from BT branches are directly involved in financial education activities in schools, at the invitation of teachers. The initiative is aimed at children and young people aged 4 to 18 and aims to help them understand, from an early age, the importance of proper and responsible money management.

During these sessions, our colleagues use **FIT** - Banca Transilvania's **financial education program**, designed specifically to translate financial concepts into language accessible to all age groups. Using FIT's materials and structure, they deliver interactive presentations tailored to the students' level of understanding and guide them through hands-on learning exercises.

Participants learn:

- how to distinguish between needs and wants
- the consequences of their decisions on how they spend their allowance
- how to save, prioritize, and plan
- what a personal budget is and how to manage it effectively

Through these activities, students gain not only useful information but also a healthy perspective on their relationship with money. FIT thus becomes a tool through which BT contributes to shaping a generation that is more informed, more responsible, and better prepared for the financial challenges of everyday life.

BT Club

BT Club – The Romanian Entrepreneurs' Club. Founded by Banca Transilvania in 2006, BT Club is an exclusive platform designed for entrepreneurs interested in developing their businesses and skills through access to educational resources and networking opportunities. Members have free access to a wide range of training sessions, workshops, webinars, seminars, and conferences covering topics ranging from strategic management and employee motivation to sales, human resources, and innovative solutions for business

growth. BT Club also facilitates meetings and the formation of partnerships with other entrepreneurs who share the same ideas and values, fostering a dynamic and supportive community. The club also offers free consulting through club partners and Banca Transilvania's European Programs Department, supporting entrepreneurs in accessing and developing projects eligible for structural fund financing.

Throughout 2025, BT Club continued to strengthen its role as a partner to the business community by organizing two landmark events. **The second edition of the HR Connect Conference**, held in Cluj-Napoca on **March 20, 2025**, brought together human resources professionals in a setting dedicated to the exchange of ideas and best practices. Subsequently, on **November 13, 2025**, also in Cluj-Napoca, **the second edition of the Sales Connect Conference** took place, an event focused on current trends in sales and the development of commercial skills.

Ask BT

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

- Over 3.5 million people visited the site in 2025, and nearly half a million did so to chat with AI Search
- On average, visitors ask 3 questions via AI Search and stay in the conversation for about 3 minutes
- Visitor interest has shifted from year to year, so the most searched-for information is about the BT Pay and BT Go apps and about BT products and services
- Nearly 80% visit the site from a mobile phone, and 55% arrived at the site via direct access.
- Internationally, the site is visited primarily from Germany, the United Kingdom, Italy, Spain, and France. The number of visits from the Republic of Moldova has increased year over year.

Banca Transilvania is the first bank in Romania to integrate artificial intelligence into its online communication, services, and processes, using both Robotic Process Automation (RPA) and Large Language Models (LLM).

#mentoratpebune

The "Mentorat pe bune" program is an informal meeting format designed to facilitate authentic and open discussions about the realities of entrepreneurship in Romania. The event offers a sincere space for dialogue, free of clichés or filters, where participants share

real experiences, lessons learned, and practical insights relevant to business development. Structured as an interactive dialogue rather than a traditional conference, the event encourages entrepreneurs to talk about their journey, seek advice, and connect with other members of the entrepreneurial community. The small number of participants is a deliberate choice, intended to maintain an authentic setting and facilitate valuable exchanges of expertise.

The guest for the 2025 edition was Radu Savopol, co-founder of the 5 to go chain, one of the strongest Romanian brands in the coffee industry. With over 20 years of experience in entrepreneurship, he shared his journey, from humble beginnings in a space of just 13 m² to the development of the largest coffee shop network in Eastern Europe, with over 600 locations. During the meetings in Arad and Târgu Mureș, he spoke about the initial challenges, the mistakes that shaped subsequent decisions, the key moments, and the courage that underpinned the brand's expansion. The event is dedicated to entrepreneurs who want to learn, be inspired, and grow in an authentic way, #pebune.

BT Business Line

As part of its initiatives to support entrepreneurs, the BT Group launched a mini-series of short videos designed to help people understand the products and services offered to businesses. Each episode was produced in an accessible and dynamic format, featuring an influencer or comedian who is also an entrepreneur engaging in a conversation with a BT colleague about common questions and challenges when interacting with the bank. These conversations addressed "FAQ"-style topics, presented in a friendly and engaging style, with the goal of making the basics of banking easier for entrepreneurs to understand.

The series covered the most relevant topics for the business segment, ranging from checking accounts, POS systems, and the bank's digital apps to online security and checking account packages. Through this initiative, the bank provided clear, easy-to-understand explanations, thereby supporting the development of financial literacy within the entrepreneurial community.

Financial education projects and youth projects at Victoriabank

The "A Memorable Day at the Bank" Project

In 2025, Victoriabank reaffirmed its commitment to youth development, promoting financial education as an essential pillar of social sustainability. The bank's headquarters hosted over 100 children and young people, ranging from first-grade students to high school students in grades 10–12 from educational institutions in the capital. The Human Resources team designed a customized program aimed at capturing the attention and sparking the curiosity of both students and accompanying teachers.

The activities included thematic sessions dedicated to:

- The history of banking and the evolution of banknotes;
- The structure of a commercial bank;
- How ATMs and operational infrastructure work;
- Responsible money management;
- The use of digital banking.

In this way, Victoriabank contributes to the development of a new, informed, and responsible generation, encouraging the adoption of healthy financial behaviors and facilitating young people's early access to the fundamental concepts of financial education.

Victoriabank Partnership with AIESEC CHIȘINĂU

In 2025, for the third consecutive year, Victoriabank continued its partnership with AIESEC Chișinău, the largest global youth organization focused on developing leadership and entrepreneurial skills among young people. AIESEC is an international organization led by young people, students, and recent graduates of higher education institutions who are passionate about global issues, leadership, and management. This partnership reflects the shared commitment of Victoriabank and AIESEC Chișinău to support the personal and professional development of young people in Moldova and to actively contribute to the well-being of the community. In 2025, two editions of the joint project "Career Orientation: Zoom in Victoriabank" were organized. The event offered young people networking sessions and interactive workshops, training, and facilitated direct interaction with professionals from various departments within the bank: Human Resources, IT, Customer Service, Audit, Marketing, Operations, Treasury, Risk, Accounting, etc., including opportunities for internships, job shadowing, and employment. The project provided valuable hands-on experience and an authentic learning environment for young people interested in a career in banking. Additionally, the bank participated in meetings with students as a partner, where it presented the opportunities offered by Victoriabank as an employer. In addition, Victoriabank employees conducted training sessions for young people, sharing their professional experience.

Victoriabank Partnership– Diez.md

In 2025, Victoriabank continued its strategic collaboration with the diez.md platform, a portal recognized for its contribution to informing and supporting young people in the Republic of Moldova through educational initiatives and projects dedicated to career guidance. As part of this collaboration, two professionals from Victoriabank, the Deputy Director of Human Resources and an Auditor from the Internal Audit Department, participated in media projects aimed at presenting authentic perspectives on careers in the banking sector and inspiring young people on their professional paths. Through employee participation, Victoriabank was able to offer young people in Moldova real-life examples of professional development in the banking sector and to highlight an organizational culture

based on continuous learning, dedication, and performance. These authentic testimonials have helped strengthen the bank's position as an attractive, people-oriented employer committed to supporting young people.

Global Money Week

For the fourth consecutive year, Victoriabank has joined the international Global Money Week campaign, an initiative supported by the National Bank of Moldova, designed to inspire and educate children about the importance of responsible money management. This year, 34 students from Primary School No. 120 "Pas cu Pas" in Chişinău, accompanied by teachers and a group of parents, were our guests.

In a friendly and interactive atmosphere, the children explored essential concepts such as the value of money, saving, managing expenses, and smart investing. Through hands-on activities and real-life examples, they learned how banks work, what a savings account is, and why it's important to make wise financial choices from a young age.

With the help of Victoriabank specialists, the young participants analyzed various international currencies, discovered how banknotes are secured, and learned how to recognize authentic ones.

One of the highlights of the young students' visit was the demonstration at the multifunctional ATM installed at the Head Office. The children were shown how to use an ATM, what transactions they can perform, and how cards are protected against risks. In addition, the students had the opportunity to see how mobile banking apps work and how electronic payments are made - essential elements in an increasingly digital world.

3.5 Investments in the Community

The BT Group considers community investments an integral part of its role in the economy and society. By directing financial resources, expertise, and volunteer involvement, the bank contributes to the sustainable development of the communities in which it operates.

We aim for our impact to extend beyond our financial activities and generate real change in the communities we serve. We support social projects of national significance, as well as initiatives that address the specific needs of local communities through grassroots involvement.

The main areas of community engagement that guide us when selecting projects to support are:

- Supporting the Romanian economy and entrepreneurs;
- Supporting competitive sports;
- Supporting the cultural and artistic sector;
- Supporting young talent and the development of new ideas;
- Providing support and solidarity to disadvantaged communities;
- Engaging in projects related to the environment and environmental protection.

Responsibility for sponsorship policies and procedures lies with the Marketing, Communications, and PR Department. The selection of CSR projects in which we participate is based on clear criteria, such as: relevance to the community, alignment with BT's brand values and positioning, potential for long-term impact, and the ability to generate engagement and visibility consistent with the communication strategy; developing long-term partnerships with nonprofit organizations.

Eligible for sponsorship are non-profit legal entities, public institutions and authorities, as well as public figures residing in Romania who are active in the aforementioned fields. In addition, we support radio and TV programs, as well as editorial projects - books or publications - that fall within these areas of interest.

At the local level, the Bank's branches have annual budgets dedicated to sponsorship, which they manage in accordance with internal procedures, supporting initiatives that have an impact on the communities where they operate. Sponsorship thresholds and the distribution of funds to branches are established annually at the Leaders' Committee meeting.



In 2025, sponsorships provided by Group companies totaled 87 million RON.

As part of the community investment planning process, we consistently take into account feedback from the associations and NGOs we collaborate with. We conduct regular consultations and direct discussions to identify the real needs of beneficiaries, and when

new needs arise, we adapt our priorities and interventions flexibly. These ongoing dialogues through meetings, working sessions, and evaluations throughout project implementation allow us to best respond to the needs of the communities where we operate.

In 2025, two of the projects we supported were recognized with GOLD awards in the Community Index 2025, confirming their positive impact and relevance to society:

- [The “DAR Scholarships” program](#), implemented by the Hope and Homes for Children Foundation;
- [The “What’s Next” program](#), run by Save the Children.

The impact of sponsored projects is assessed both during their implementation and upon completion. In collaboration with partner NGOs, we establish clear objectives and actions at the start of the project, after which we monitor progress through regular discussions and adapt if additional needs arise. At the conclusion of each project, we request a detailed report highlighting:

- how the funds were used,
- the number and profile of beneficiaries,
- the degree to which the initially established activities were carried out,
- the project’s sustainability and the continuity of interventions.

As key evaluation indicators, we look at the number of beneficiaries, the relevance and effectiveness of the activities carried out, the transparent use of funds, and the potential to generate a lasting impact.

Regarding our colleagues’ involvement in volunteer activities, we do not have a formal internal policy dedicated to volunteering, but we actively encourage participation in initiatives that have an impact on the community. The most common projects are the annual reforestation efforts, and in 2025 we also organized a hike along the Via Transilvanica, in which over 600 BT colleagues participated, strengthening team spirit and contributing to environmental protection.

Environmental Projects

Reforestation initiatives

In 2025, reforestation efforts continued through two initiatives carried out in April in the Transylvania region.

Together We Plant a Forest, a project carried out in partnership with the Beard Brothers Association and launched in 2023, involved planting 10,000 oak and ash saplings across 3 hectares in the village of Suarăș, Bobâlna commune. Over 500 volunteers participated in the initiative.

As part of the “We Reforest EC Village” initiative, held in Bontida, 1,000 saplings were planted across 1 hectare, with the involvement of over 100 volunteers. The project was launched in 2023 and is carried out annually.

From 2014 to the present, the Bank has invested over 600,000 euros in volunteer reforestation programs carried out in the counties of Cluj, Bistrița-Năsăud, Călărași, and in Bucharest. By the end of 2025, over 14,000 volunteers had actively participated in these initiatives, planting over 340,000 saplings across nearly 90 hectares of land, which have since grown into forests.

Through these efforts, the Bank makes a tangible contribution to protecting the environment and conveys a powerful message of responsibility, engagement, and care for nature to younger generations.

Via Transilvanica - Tășuleasa Social

The partnership between Banca Transilvania and the Tășuleasa Social Association has a history spanning over a decade and is based on shared values such as environmental stewardship, local community development, and civic engagement. The collaboration began with volunteer programs for reforestation through the Transylvania Forest initiative, in which thousands of BT volunteers have contributed, over the years, to planting hundreds of thousands of saplings in several counties across the country.

Starting in 2023, the partnership was expanded to a strategic level through support for the Via Transilvanica project, the road that unites, Romania’s first long-distance trail, which crosses the country over a distance of approximately 1,600 kilometers. Since then, we have supported the project through financial contributions, volunteer activities, as well as through promotion and the active involvement of our employees. The Bank’s involvement contributes to the preservation of Romania’s natural and cultural heritage, the revitalization of rural areas, and the strengthening of a sense of belonging and unity among the communities along the route.

The project enjoys high visibility among the public and managed to attract over 140,000 hikers last year, with Via Transilvanica becoming an international landmark.

Cultural Events

BT x MARE

The Museum of Recent Art (MARE) houses a representative collection, bringing together over 1,300 works by national and international artists, with a particular focus on art created from the 1960s to the present. The collection focuses on local art from the past 50 years, reflecting the evolution and diversity of Romania’s contemporary art scene.

The museum space covers approximately 1,200 square meters, spread across five levels of a building with spectacular architecture, and displays over 150 works to the public, in accordance with museographic standards.

MARe is a cultural project playing an active role in the development and consolidation of Romania's contemporary art scene, contributing to increased visibility for artists and the promotion of their works.

Throughout 2025, the museum hosted two landmark exhibitions for the cultural industry, "All Our Todays" and "Does Anyone Want to Be Me?", which attracted a significant number of visitors, both through traditional visits and guided tours, as well as through creative workshops and private events.

In 2025, Banca Transilvania entered into a partnership with MARe to organize events for BT colleagues and clients, encouraging openness and interest in contemporary art. Through these initiatives, the museum attracted approximately 20,000 visitors.

Through this partnership, Banca Transilvania aims to support the growth and development of contemporary art in Romania by facilitating the general public's access to relevant exhibitions and works, as well as to workshops and meetings with renowned artists and curators, dedicated to BT's clients, colleagues, and partners.

RAD 2025 (22 – 25 mai)

Compared to the first edition of RAD Art Fair, the artistic quality of the contemporary art fair has increased significantly year after year, as has the number of activities integrated into the event days.

In 2025, the fair featured 28 galleries (including spaces in Bucharest, Cluj, and Timișoara, as well as galleries in Chișinău, Warsaw, Vienna, and Berlin, all active at the highest level of the international contemporary art scene, including Art Basel), featuring works by over 100 artists, 31 curators from 17 countries, over 1,500 VIP guests and 8,500 visitors, 100 works in the sculpture park, 17 collateral events organized by museums/collectors and galleries, plus 6 awards presented to the best works. Also launched were: RAD Cinema and Platform, for emerging galleries, with a mentoring program included.

Mina.Cluj – immersive art museum

Since its opening, MINA.Cluj has launched 12 immersive shows, plus ancillary events (film screenings or themed cinemas), which have attracted approximately 220,000 visitors to the museum over the course of a year. An industry record, with even more visitors than the immersive space in Bucharest. Our partnership with MINA.Cluj was heavily promoted through both permanent branding materials and online or via BT's communication channels (newsletters, ATM videos, window decals at BT agencies, OOH spaces). Additionally, a key pillar of our collaboration with them was the benefits section in BTPay for customers, as

well as special promotions designed for colleagues. We offered discounts for payments made with any BT card, guided museum tours for colleagues, and more.

TIFF

The Transylvania International Film Festival (TIFF) continues to be one of the most significant cultural events in Romania, contributing to cultural life and providing the general public with access to international and local cinema. The 2025 edition, the 24th, brought together approximately 125,000 participants in Cluj-Napoca over 10 days of screenings and events.

The festival program included hundreds of screenings, events dedicated to the film industry, exhibitions, and cultural activities. A large portion of the films screened, over 100 screenings, were sold out, reflecting the public's growing interest in the cinematic diversity promoted by TIFF.

Banca Transilvania has been the festival's main partner since 2018 and consistently contributes to its development and the expansion of its impact across the country. BT's support covers not only the main edition in Cluj, but also extensions such as TIFF Sibiu, TIFF Timișoara, TIFF Oradea, the TIFF Unlimited Caravan, the White Night of Romanian Film, the Sunscreen Festival, Luna Plină, Alba Iulia Music & Film, and the Gopo Awards Gala. This long-term partnership supports cultural diversity, initiatives dedicated to film education, and the strengthening of creative communities in Romania.

Additionally, throughout 2025, Banca Transilvania has served as a partner at major festivals, offering creative activations, digital solutions, and financial education components, thereby strengthening its connection with young audiences and new generations.

The Art Encounters Foundation, based in Timișoara, is one of the most important platforms for contemporary art in Romania and Central and Eastern Europe. In addition to its permanent exhibition program, it organizes the Art Encounters Biennial and programs focused on education, cultural mediation, and artist residencies.

The permanent exhibition program in 2025 featured the most comprehensive retrospective of artist Ștefan Bertalan: "In the Rhythm of the World," Anca Benera & Arnold Estefán: The Unfolding of the World, and many exhibitions dedicated to emerging artists.

In 2025, Art Encounters attracted approximately 25,000 visitors through both its permanent art program and the Art Biennial. Over 150 related events were organized: guided tours, children's workshops, performances, debates, and book launches.

Faber Timișoara is one of the most important independent cultural centers in western Romania, a leading venue for contemporary art, design, and the creative industries, attracting thousands of visitors annually through exhibitions, concerts, and cultural events, and playing a central role in the 2025 Art Encounters Biennial.

Unfinished Festival

Unfinished is one of the most important interdisciplinary events in the region, a space where the dialogue between technology, art, and social reflection opens new perspectives on the world we live in. The 2025 edition marks the third year of our partnership and continues to strengthen a community united by curiosity, ideas, and memorable experiences. For us, participating in Unfinished represents not only support for a valuable cultural project, but also a strategic opportunity to stand alongside the people and initiatives that influence the directions of tomorrow's society.

In 2025, the event attracted 3,141 participants, solidifying its role as a relevant space for exploration and conversations about the future. The audience for this edition reflects the modern profile of the Unfinished community: 68.95% women, 29.9% men, with the majority in the 25–40 age group (65%).

At the same time, throughout 2025, Banca Transilvania served as a partner at major festivals, featuring creative activation, digital solutions, and financial education components, thereby strengthening its connection with young audiences and new generations.

Beach, Please! 2025

The 2025 edition of the Beach, Please! festival took place July 9–13 in Costinești, bringing together international artists and a large audience, with over 155,000 attendees on the day with the highest turnout. Considered one of the largest urban music festivals in Europe, the event featured BT in the participant zone, offering payment solutions, relaxation areas, interactive activations, and a basketball court set up for the public.

Electric Castle 2025

At the 11th edition of the Electric Castle festival, which brought together approximately 289,000 attendees, BT was present through the BT World concept, significantly expanded in 2025. The space included a relaxation area and an interactive installation set in the nearby forest, becoming a landmark for attendees.

Activities included the interactive FIT | BT quiz with prizes and a seating area, the Kids Area dedicated to participants' children, featuring educational and interactive activities organized in partnership with NGOs, as well as Chill by the Hill, a relaxation area situated at the highest point of the festival.

Untold 2025

At the UNTOLD X anniversary edition, which brought together over 470,000 attendees, BT was present with several spaces dedicated to the public. BT World incorporated a thematic design and a financial education component through the FIT | BT activation, which included an interactive quiz with prizes. The main festival area also featured the BT VIP Lounge, a

platform located near the main stage, dedicated to holders of BT x UNTOLD x VISA cards. Additionally, the festival introduced the Kids Area, a new activation space with themed decor and BT Pay Kiddo materials.

Nostalgia 2025

(4 editions in March, June, August, and November + two anniversary editions)

In 2025, Nostalgia featured four editions held in March, June, August, and November, along with two anniversary editions. BT maintained a consistent presence at the event through themed brand activations such as BT Disco World and BT Dream Vault, payment solutions, and the FIT | BT component, which included a financial education quiz with prizes.

The 2025 presence covered three editions held in Bucharest, with approximately 170,000 participants in total, one edition in Constanța, Mamaia, with 45,000 participants, as well as two national editions in Craiova and Oradea, which brought together approximately 13,000 participants.

Sport

Transylvania Open

The 2025 edition of the Transylvania Open solidified the tournament's position on the WTA 250 circuit, continuing to attract international interest and keeping Cluj-Napoca on the world tennis map.

The main draw also featured acclaimed Romanian players such as Ana Bogdan, Gabriela Ruse, and Simona Halep, who made history by announcing her retirement at the end of the tournament. The competition was won by Anastasia Potapova, who defeated Lucia Bronzetti in the final.

Banca Transilvania continued its partnership with the Transylvania Open in 2025, supporting the tournament's development and visibility on the circuit. The continuation of this partnership reflects BT's commitment to promoting competitive sports and supporting major international events organized in Romania.

U-Banca Transilvania Sports Club

The partnership between Banca Transilvania and U-BT Sports Club began in 2015 and has expanded over time to include collaboration with the Romanian Basketball Federation and support for the national team. U-BT is one of the most professionally organized structures in Romanian basketball, active at all levels: junior teams, an academy, and a senior team. In 2025, U-BT had a strong season, once again emerging as the Romanian champion, drawing a record crowd at BT Arena, and reaching the quarterfinals of the BKT EuroCup. The greatest achievement of the 2024–2025 season was joining the ABA League, a competition that brings together the most important teams in former Yugoslav basketball, with a

tradition spanning over two decades. Banca Transilvania maintains a close connection with this club, in the spirit of promoting performance and supporting team sports.

Sports Festival

Sports Festival, now in its sixth edition in 2025, once again brought to Cluj-Napoca the most comprehensive experience dedicated to mass sports and the community. The event took place between June 12 and 15, 2025, in the traditional areas around Cluj Arena, Central Park, and Iuliu Hațieganu Park. The program featured over 100 events and introductory sessions in more than 25 sports, offering experiences for all ages and skill levels.

One of the highlights of the edition was the “Ronaldinho & Friends” exhibition match, a unique show that brought Ronaldinho, Adriano, Robert Pirès, Marco Materazzi, Wesley Sneijder, and other major names in world soccer onto the field, alongside Team Romania, made up of former great Romanian players such as Adrian Mutu, Mirel Rădoi, and Răzvan Raț. The exhibition match took place at the BT Arena and was one of the most anticipated highlights of the festival.

Banca Transilvania continued to support the festival, reinforcing its role in promoting an active and healthy lifestyle.

Romanian Football Federation

Banca Transilvania initiated its partnership with the Romanian Football Federation in 2021, becoming the federation’s official bank and the main partner of the youth and junior teams. Starting in 2023, the partnership expanded to include the senior national team, and by the end of 2024, BT had also become the sponsor of the Women’s National Soccer Team. In 2025, BT supported the national team on its journey to the World Cup, and in June, the organization of the Under-19 Final Tournament - UEFA EURO 2025.

Romanian Basketball Federation

As early as 2017, we began a strategic partnership to develop Romanian basketball at the national level by supporting the Romanian Basketball Federation and the men’s teams. Toward the end of 2025, we also became supporters of the women’s teams within the federation and served as main sponsors for the organization of the National Women’s Basketball League and the Women’s Basketball League 1. Also in 2025, we supported the organization of mini-basketball and baby-basketball tournaments, thereby achieving a 360-degree integration into Romanian basketball.

Gheorghe Hagi Sports Club Academy

The Gheorghe Hagi Sports Club Academy is the largest soccer project in Romania, aimed at training, preparing, and developing children and youth for performance at the national and international levels. Currently, the academy hosts approximately 250 athletes, organized into 13 age groups, ranging from 6 to 19 years old. In its first ten years of

operation, it has won 24 national junior titles and has consistently contributed to the national teams, with an average of over 40 players per season. Banca Transilvania supports this project in line with its commitment to athletic performance and the development of younger generations.

In addition to the projects outlined above, Banca Transilvania has expanded its involvement in sports through long-term partnerships and strategic initiatives with organizations and clubs that contribute to the development of Romanian sports, supporting both elite and recreational sports. In this context, the bank has been providing ongoing support to the Romanian Olympic and Sports Committee since 2022 to assist athletes representing Romania in international competitions, including the 2026 Winter Olympics and the 2028 Summer Olympics; it maintains a long-term partnership with FC Universitatea Cluj, a club that is emblematic for the local community; and supports the Napoca Rally Academy, contributing to athletic performance and the promotion of road safety education. At the same time, the bank supports mass sports projects, such as the Apuseni Marathon, the Via Transilvanica Marathon, and the Timișoara 21K.

Social Projects

The Blondie Association provides medical air transport for seriously ill children who cannot be treated in the country and urgently need access to hospitals abroad.

Banca Transilvania is the strategic partner of the Blondie Association, supporting medical air transport for seriously ill children through direct sponsorships, national campaigns, and facilitating donations via BT Pay. The partnership directly contributes to saving lives and ensuring equitable access to emergency medical treatment.

The Little People Association provides psychosocial support to children and adolescents diagnosed with cancer, as well as to young survivors of the disease, maintaining a daily presence in pediatric oncology wards across Romania and the Republic of Moldova. The organization provides specialized psychological interventions and coordinates the Temerarii Community, a network dedicated to young people who have overcome the disease.

Banca Transilvania has been collaborating with the association since its early months of operation, providing constant support through direct sponsorships, donation campaigns via BT Pay, and dedicated POS terminals. One of the fully supported projects is “Sunt OK!”, Romania’s first teletherapy and platform for children and young people affected by cancer, through which 700 free therapy sessions have been provided to date for young people and their families.

SOS Children’s Villages’ mission is to provide a family environment for children without parental support and to prevent the separation of children from their biological families. The organization provides family-based alternative care, supports vulnerable families to

prevent abandonment, and develops services in the areas of education, health, and social integration.

Banca Transilvania supports the organization annually through direct financial aid, national donation campaigns, education and social inclusion projects, as well as targeted interventions in vulnerable communities. A strategic project is the Caravan of Good Deeds, which aims to address specific local needs by improving living conditions, facilitating access to medical services, setting up educational and play spaces, organizing camps and non-formal education activities, as well as developing resource centers for children and youth, such as the one in Avrig, funded by BT.

The Casa Bună Association has been working for over 15 years with children and adolescents from extremely vulnerable backgrounds, particularly in Ferentari and Jilava, as well as in the towns of Nucșoara and Lerești, Argeș County. Banca Transilvania is an active and consistent partner of the organization, with support including both direct funding and the involvement of the BT community.

The collaboration in 2025 included an internal campaign through which winter jackets and boots were collected and donated for 600 children, as well as the distribution of mărțișoare made by Casa Bună at BT branches in Cluj and Bucharest, thereby contributing to the support of the educational and social activities carried out by the association.

Peditel – BT is the strategic partner of PEDITEL, the only free 24/7 pediatric assistance service in Romania. Through this partnership, we support its operations via direct donations, donation-matching campaigns, and integration into the BT Pay ecosystem. The partnership contributes to equitable access to medical services for children and helps reduce the strain on the public healthcare system.

Hope and Homes for Children is one of the organizations active in the field of child protection, with a mission to close orphanage-style centers and offer every child the chance to grow up in a family environment.

Banca Transilvania has a long-standing partnership with the organization, through annual sponsorships, strategic education and inclusion projects, the integration of the foundation into BT Pay, and the direct involvement of BT colleagues in activities such as financial education sessions and workshops. One of the projects supported annually, starting in 2023, is the DAR Scholarships program, which supports vulnerable children and young people with outstanding achievements in education, sports, and the arts. In the 2025–2026 edition, 35 scholarship recipients - high school and college students - were selected, each receiving a scholarship of 2,000 euros, as well as access to personal development activities, including mentoring, camps, and workshops.

Save the Children is one of the oldest and most respected organizations in Romania dedicated to supporting children, with initiatives in areas such as health - through the

reduction of infant mortality - education, social protection, and the promotion of children's rights.

Banca Transilvania has a multi-year partnership with the organization, which began in 2020, and includes recurring sponsorships, strategic projects in the fields of health and education, as well as national campaigns.

Among the supported initiatives is the What's Next project, a pilot program for vocational guidance and career counseling aimed at students, parents, and teachers, which also includes an interactive digital platform with self-awareness resources and tools for making informed decisions regarding educational and professional paths. The bank also supports the "We Support the Toughest Starts" project, carried out in partnership with Mastercard, a three-year strategic program aimed at reducing infant mortality by equipping maternity wards, training medical staff, and providing postnatal monitoring for at-risk newborns.

3.6 Cybersecurity and Personal Data Protection

External Context

Digital transformation in the financial sector is accelerating the need for a European regulatory framework that ensures a high level of security and resilience.

In this context, Regulation (EU) 2022/2554 on digital operational resilience, known as DORA and applicable as of January 17, 2025, becomes an important benchmark for all financial institutions. DORA functions as a “lex specialis” in the field of cybersecurity and incorporates requirements that were previously set out separately in various directives and regulations, including the NIS 2 Directive (Network and Information Security Directive 2, which aims to strengthen the overall level of cybersecurity in the EU).

The regulation is built on five pillars that define how the sector must manage digital risks: ICT risk governance, incident reporting, operational resilience testing, supplier risk management, and information sharing.

At the same time, the financial sector is influenced by the accelerating pace of the market. The emergence of digital-native players, with fast, intuitive, and strongly customer-experience-oriented solutions, is changing consumer expectations and raising standards regarding the availability, security, and performance of digital services. These developments are influencing not only the regulatory framework but also the way financial institutions are rethinking their operational models, technological infrastructure, and development strategy.

Thus, to actively adapt to the new digital reality, BT Group prioritizes technological transformation and compliance with European regulations. These strategic priorities are reflected in concrete projects and clear courses of action. One example is Salt Bank, Romania's first fully digital bank, an initiative that demonstrates the Group's commitment to innovation.

Internal Regulatory Framework

A significant part of the Group's activity depends on the secure and efficient management of large volumes of confidential information and sensitive data, as well as the processing of a high number of complex transactions. The Group manages extensive data on its customers, both individuals and legal entities, and is responsible for accurately reflecting all operations related to their accounts. Thus, the secure and uninterrupted operation of the entire IT infrastructure and communications networks is vital for business continuity.

At the same time, activities conducted with third parties, although governed by strict contractual agreements, may also generate cyber and technological risks. The Group operates a strictly controlled IT environment and limits external vendors' access to its systems. However, situations involving unauthorized access, data loss or destruction, or

other incidents that could affect operations may arise. Such risks, if they persist, could impact the Group's business, strategy, and financial performance.

In this context, cybersecurity is a critical area for protecting BT's business, employees, and customers. The Bank has developed a robust framework of information security standards, applicable at the Group level, which includes a set of 29 policies defining the organizational and technical requirements necessary to protect data and maintain a high level of information security. These include the Information Security Policy, the Security Operations Center Operating Procedure, the Security Incident Management Policy, and the Security Incident Response Procedure. These documents are supplemented by an extensive set of internal policies and standards, such as the General Policy on Payment Service Security, the Standard on IT Security Regulations, the Information Access Control Policy, the User Access Management Policy, the User Responsibilities Policy, and the Information Classification Procedure. Together, they rigorously define the scope, objectives, guiding principles, roles, and responsibilities of all parties involved, while ensuring compliance with external requirements and applicable regulations regarding information security.

By implementing these measures, the Bank aims to effectively manage the risks associated with cyber threats and prevent any incident that could compromise confidentiality, integrity, or availability of data. At the same time, these measures help protect the institution's reputation and ensure operational continuity, strengthening the trust of customers and partners in the services offered by BT.

Responsibilities for information security are assigned to a dedicated department reporting to the CRO (Chief Risk Officer). The ICT & IT Security Risk Management Department is part of the organization's second line of defense and is responsible for managing and overseeing ICT and cybersecurity risks, as well as implementing a control system to ensure the operational performance and security of ICT systems. This system includes appropriate controls for identifying, measuring, assessing, managing, monitoring, and reporting ICT security risks.

The department is led by a Department Head and oversees the following units: the Information Security Governance Service, the Cybersecurity Service, the Application Security Service, and the IT Security Risk Oversight Service.

Objectives:

- Defining the information security management framework, based on the principles defined in information security standards and industry best practices;
- Providing specialized support to the subsidiaries of BT Group to assist them in developing their own information security policies;
- Identifying, monitoring, and defining measures to mitigate information security risks;
- Defining the information security strategy and measures for its implementation within the organization;

- Providing the necessary support regarding procurements specific to information security solutions.

Activities, duties, and responsibilities of the ICT & Sec IT Risk Management Department:

- Ensures and monitors compliance with the Bank's internal policies and regulations;
- Provides support in the technical development and review of the risk management framework, in accordance with standards and best practices (such as, but not limited to, ISO 27001, ISO 27002);
- Develops and monitors the implementation of security risk logic for security solutions under the responsibility of the first line of defense, and develops, implements, and monitors risk logic for solutions managed by the department;
- Tests, monitors, and evaluates the implementation of risk management rules in security solutions managed by the first and second lines of defense;
- Establishes and configures verification, detection, and alerting mechanisms within the security solutions managed by the department, ensuring configuration compliance and proper maintenance;
- Provides support for reporting key risk indicators (KRIs) and creating dashboards for monitoring ICT & IT Security risks;
- Develops control logic based on evaluated alerts and reported incidents, including for the technical and administrative configurations of the security solutions managed by the department;
- Provides support in documenting and investigating critical information security incidents, maintaining a record of incident management activities and requesting additional information from the teams involved;
- Monitors violations of information security policies or external regulations and proposes corrective measures, in collaboration with the relevant organizational units, including for assessing the effectiveness of controls, identifying vulnerabilities, and formulating risk mitigation strategies;
- Provides specialized expertise in the field of information security to ensure that the Bank's new projects and current activities comply with regulations and best practices in the field;
- Coordinates the technical evaluation of security solutions managed by the department;
- Manages projects within the department through a dedicated project manager (PM), assigned in accordance with applicable Internal Rules of Procedure and procedures;
- For all of the above activities, teams within the department must have full access to the verified systems, information, and processes.

In line with the Group-wide internal cybersecurity regulatory framework, Banca Transilvania is ISO 27001 certified for its electronic archiving and software development processes. This framework forms the foundation of a rigorous information security system, combining technical processes, internal policies, and operational procedures into a coherent cybersecurity risk management system.

By implementing ISO 27001, the Bank pursues three key objectives:

- protecting customer data and preventing information leaks;
- developing effective mechanisms for detecting and preventing cyberattacks;
- continuously monitoring and improving all processes related to IT security.

Cybersecurity Incidents and Measures to Manage Them

The Bank faces multiple Distributed Denial of Service (DDoS) attacks annually, but their impact is minimized thanks to the effectiveness of the technical and non-technical controls implemented to limit the effects and maintain operational continuity.

This level of protection is supported by a set of well-defined preventive and response measures:

- the use of anti-DDoS solutions provided by a global partner with expertise.
- contracting managed monitoring and specialized mitigation services that provide infrastructure-level protection.

These are complemented by the internal response capability of a Security Operations Center team, responsible for 24/7 incident monitoring and management, intervening rapidly through investigations and remediation measures, ensuring an appropriate response and resolution time.

To assess security incidents, the Bank classifies the impact level based on the effects on operations and customers. The impact is determined based on criteria such as the number of affected users, the duration of the incident, and the geographic distribution of the affected area.

Based on these elements, the impact can be classified into one of the following categories:

- Low impact: the incident has a limited effect on delivery service, without significant disruption and without relevant consequences for a large number of users.
- Medium impact: the incident causes a disruptive effect on service delivery, affecting a moderate number of users or a limited geographic area for a specific period of time.
- High impact: The incident has a significant disruptive effect on service delivery, affecting a large number of users, a wide geographic area, or causing prolonged service interruptions.

As part of cyber security risk management, the Bank considers the potential occurrence of DDoS attacks with varying levels of impact. Such events are addressed through dedicated root cause analysis processes and remediation of identified vulnerabilities, in line with internal post incident analysis procedures. As a result of these analyses, DDoS mitigation policies are periodically reviewed and updated, and monitoring and response mechanisms for protection systems are strengthened, with the aim of reducing the potential impact on operations.

Key Risk Indicators

Key Risk Indicators (KRIs) are a set of metrics used for continuous monitoring of exposure to risks generated by cyber threats, technological vulnerabilities, or IT&C system malfunctions.

These indicators serve as early warnings and enable the identification of trends or signals that may indicate a deterioration in cybersecurity, before they lead to major incidents with operational, financial, or reputational impact.

The indicators are used for periodic monitoring and contextual analysis, but they do not automatically trigger corrective measures, rather, they require further evaluation by the risk function or the responsible units.

These may include indicators mandated by regulations or international best practices in the field of information security.

Key risk indicators contribute to:

- early identification of increased exposure to cyberattacks;
- monitoring the vulnerability level of the IT infrastructure;
- assessing the effectiveness of implemented controls;
- supporting the decision-making process regarding the need for additional protective measures.

Examples of KRIs used to monitor cybersecurity risks

Indicator	Definition	2025
Number of critical cybersecurity incidents identified	The number of critical cybersecurity incidents identified in the bank's IT systems that affected or could have affected the confidentiality, integrity, or availability of information during the reporting period.	4
Number of confirmed connections	Number of confirmed connections to Command & Control servers.	0
Confirmed ransomware incidents	Confirmed ransomware incidents.	0
Number of Malicious IPs/Domains Blocked by SOC	Number of malicious IPs or domains blocked following internal analyses by the BT SOC.	0
Number of confirmed RCE alerts	Number of confirmed alerts regarding Remote Command Execution incidents.	0
Number of confirmed Lateral Movement alerts	Number of confirmed alerts regarding Lateral Movement activities.	0
Percentage of systems evaluated for vulnerability and security testing	The proportion of systems subjected to IT security testing activities during the reporting period, including vulnerability testing, penetration testing, and other relevant security assessment activities.	100%

Communication with customers

In addition to the framework of policies, procedures, and responsibilities defined in the area of cybersecurity, as well as the indicators used to monitor and assess digital risks, the Group pays constant attention to how technology is integrated into customer relationships and internal processes. Security is not treated exclusively from the perspective of infrastructure protection, but also as an integral part of how digital interactions, operational workflows, and fraud prevention mechanisms are designed.

In this context, communication with customers and the use of artificial intelligence-based solutions represent an important component of the digitalization strategy, contributing both to operational efficiency and to increased levels of control and transparency.

Starting in 2023, BT has been using artificial intelligence solutions developed in collaboration with Microsoft and integrated into the Întreb BT platform. The platform provides quick access to over 2,000 questions and answers about banking products and

services via the Microsoft Azure OpenAI Service. The bank also uses AI assistants to support and streamline the work of business analysts.

Modernizing customer communication channels and integrating AI-based solutions not only contribute to faster and more efficient interactions but also support the bank's internal processes. These technologies create a more secure and better-controlled operational ecosystem, where information is managed consistently, and analysis and decision-making activities are based on structured and verifiable data. Thus, the digitization of communication naturally complements the automation of internal workflows, including in the loan approval process, where traceability and control at every stage are essential.

The credit approval process follows a well-defined workflow based on the customer category, implemented directly through the Bank's IT systems. These automated mechanisms ensure traceability and create conditions for controlling each stage, reducing the risk of errors or abuse. Thus, the risks of fraud by the person conducting the analysis are significantly limited, as controls are built directly into the IT workflow, ensuring the separation of duties and the traceability of decisions.

Initiatives for Digital Education & Online Fraud Prevention

As a result of lessons learned from managed incidents, the Bank has implemented additional measures to increase security, including defining and applying a security baseline for all systems, resetting compromised credentials, and adopting stricter standards regarding password complexity and management. These measures reduce the risk of similar situations recurring and contribute to increasing cyber resilience.

At the same time, to support training efforts and foster a corporate culture focused on digital security, the bank supplements formal training programs with dedicated awareness initiatives designed to help employees quickly identify risks and respond appropriately in potentially vulnerable situations.

In the first half of 2025, the Bank stepped up its efforts to raise awareness of cyber risks by launching a comprehensive digital education campaign aimed at customers and the public. The communication was distributed across all internal and external channels used by the Bank: social media, dedicated newsletters, website articles, as well as partner publications, with the primary objective of increasing vigilance against online fraud attempts.

A new element introduced into the prevention strategy was the online security quiz, designed for both employees and customers, based on all known types of phishing attacks. The tool was structured as multiple-choice questions with two options, only one of which was correct. To ensure that the educational messages are understood correctly, each answer was accompanied by an explanatory pop-up detailing the scenario, warning signs, and recommended actions in similar situations. With questions inspired by real-life

scenarios, clear explanations, and an interactive learning mechanism, the quiz was completed by over 200,000 people in just the first few months.

From mid-2025 to the present, the Bank's efforts to inform and prevent online fraud have continued consistently across all our communication platforms. The messages have been updated based on newly identified attack patterns, helping to strengthen the culture of digital security among BT customers.

These internal and external communication initiatives were complemented by campaigns such as "Stai un pic înainte de klik – De ce sa pierzi banii câștigați cu greu?" which reinforces cyber vigilance and transforms prevention into both an individual and collective responsibility.

„Stai un pic înainte de click - De ce să pierzi ușor banii câștigați cu greu?”

Banca Transilvania's initiative dedicated to online safety began in July 2023, at a time when digital fraud attempts were becoming increasingly sophisticated. Under the name "Stai un pic înainte de click (Stop for a moment before you click)," the project started with a simple yet essential idea: to give people the tools they need to critically evaluate online information and distinguish between legitimate and fraudulent content. The first messages quickly gained traction, and in just a few months, the campaign became a benchmark in digital education, supported by social media, dedicated articles, and direct communications to customers.

In 2024, the project continued by expanding its outreach through a series of materials created in collaboration with content creators and public figures, making the topic of online safety accessible to a broad audience. The theme was also integrated into the financial education project FIT: Finance for Everyone, where a special episode was dedicated exclusively to online safety.

In 2025, the Bank introduced a new creative approach under the message "De ce să pierzi ușor banii câștigați cu greu?", which repositioned the communication in a more personal and individual responsibility-oriented direction, emphasizing the importance of protecting one's own income. The campaign had one of the highest levels of impact in the project's history, reaching millions of users and generating a level of engagement that exceeded estimates.

Today, "Stai un pic înainte sa dai un klik" is one of BT's most visible and consistent consumer protection programs. From the first visuals in 2023 to the complex campaigns of 2025–2026, the project has evolved into a comprehensive and continuous, e effort focused on education, transparency, and responsibility, key elements in the sustainability of modern financial services.

Impact Metrics

- 280,000 people have taken BT's online safety quizzes.
- 200,000+ participants in the first 4 months of the year alone; 60 winners in the initial campaign.
- 45,000+ reactions in Q1 2025 vs. 70,000+ reactions to BT posts on online safety (June–Oct 2025).
- 500,000+ customers informed via newsletters dedicated to fraud.
- 400,000+ customers/month reached through summary newsletters.
- 135,000+ views in the 9-episode YouTube series featuring educational content.
- 10+ national media outlets amplified BT's messages on fraud prevention.
- ~2 million views of social media posts between June and October.
- 1.5 million+ estimated views for the final edition of the "Think Before You Click" campaign.
- 40 million views generated through TikTok content (8 videos).

Cybersecurity Training

In 2025, the Bank continues to strengthen its cybersecurity culture by organizing regular training sessions for employees. These programs also include training on cyber vigilance, phishing, and incident management, continuing the training trajectory previously demonstrated by the over 34,471 hours of information security training completed by employees across the Group.

Personal Data Protection

To ensure a unified approach to information security, technical and operational cybersecurity measures are complemented by a **robust data protection compliance framework**, as any IT incident has direct implications for the obligations set forth in the General Data Protection Regulation (EU) 2016/679. The financial services sector has become increasingly digitized, automated, and dependent on the internet, which has amplified the Group's exposure to risks of unauthorized or accidental data disclosure through cyberattacks or IT system failures. Issues such as system errors, computer viruses, data misuse - whether intentional or accidental - hacker attacks, or unauthorized access to the bank's infrastructure can affect the institution's ability to protect customer data in accordance with legal requirements.

Such situations may compromise the confidentiality of information and lead to disruption of the services provided. In certain cases, they may also result in significant penalties or other legal and reputational consequences.

To ensure strict compliance with GDPR regulations, the entities of the BT Group have adopted a set of policies, procedures, and internal measures, structured around key areas:

- **General Rules on the Processing and Protection of Personal Data** – These rules establish the general framework for the lawful, fair, and transparent processing of personal data across all BT Group entities, ensuring respect for the rights of data subjects and the implementation of appropriate security measures.
- **Procedures for managing personal data breaches** – These procedures define the steps necessary to identify, report, remedy, and, where applicable, notify in accordance with legal provisions, security breaches that result, accidentally or unlawfully, in the destruction, loss, alteration, or unauthorized disclosure of processed personal data or unauthorized access thereto.
- **Procedures for ongoing employee training** – All employees of BT Group entities participate in regular training programs on the protection and processing of personal data. These sessions ensure that employees' knowledge of GDPR requirements, best practices, and individual responsibilities in managing personal data is continuously updated, to ensure compliance with legal requirements in day-to-day operations.
- **Strict data privacy rules** – Group employees are required to respect the confidentiality of personal data, including financial data protected by banking secrecy. These rules impose clear restrictions on access to and use of such data to prevent unjustified use and unauthorized disclosure.
- **Regulations regarding the rights of data subjects** – Individuals whose data is processed by BT or other entities within the BT Group enjoy all the rights provided by the GDPR, including the right of access, rectification, erasure, restriction of processing, objection, data portability, the right not to be subject to decisions based solely on automated processing, as well as the right to withdraw consent when it constitutes the basis for processing. Internal procedures establish how these requests are handled, ensuring they are resolved within the legal timeframes. In accordance with the principle of transparency, the Bank and BT Group entities provide data subjects with clear information notices regarding the purposes and legal bases of processing, the recipients of the data, the retention period, the contact details of the data protection officer, and the rights guaranteed.
- **Rules regarding data processing in direct marketing activities** – Any activity involving the processing of personal data for advertising purposes (direct marketing) carried out by BT or the group entities complies with GDPR rules, is conducted based on strict processes, grounded in the freely given consent of data subjects for data processing, with clear options provided for withdrawing this consent.
- **Procedures for managing the processing and protection of personal data in relation to contractual partners** – BT Group entities have implemented clear rules defining responsibilities regarding the protection of personal data in their

collaborations with contractual partners. When processing personal data on behalf of and under the instructions of BT Group entities, partners have strict contractual obligations regarding the purpose and scope of processing, data security, and support provided to the controller. In situations where partners determine the means and purposes of processing jointly with BT Group entities, the responsibilities of each party are clearly defined to ensure a uniform and high level of protection for data subjects.

Each entity of the BT Group has developed a public policy regarding the processing and protection of personal data (privacy policy), available to the public via the website of each entity within the BT Group. Through this privacy policy, each entity informs data subjects about matters related to the processing of their personal data, in accordance with the provisions of Articles 13–14 of the General Data Protection Regulation (GDPR).

Regulations on the record-keeping of personal data processing activities

BT and the Group entities maintain detailed records of personal data processing activities to ensure compliance with the reporting obligations imposed by the GDPR. By implementing this regulatory framework, the Group reaffirms its commitment to complying with the requirements of the Regulation, both regarding the lawful processing of personal data and ensuring a high level of personal data security.

Responsibility for the protection of personal data

At the Group level, dedicated individuals have been appointed to serve as Data Protection Officers (DPOs), ensuring compliance with specific regulations and the protection of data subjects' rights. To facilitate transparency and accessibility, the DPO's contact details are publicly available, allowing consumers and users to effectively exercise their rights regarding the processing of personal data.

The Data Protection Officer designated for Banca Transilvania can be contacted at the dedicated email address dpo@btrl.ro, publicly available on the Bank's website within the BT Privacy Policy. The complaint channels made available to customers for each subsidiary, including complaints regarding personal data breaches, are detailed in Section 3.2. Customers and users of BT Group products and services.

Complaints received through reporting channels

In 2025, Banca Transilvania received a total of 11,781 requests regarding the processing and protection of personal data, of which 3,933 were resolved in favor of the data subjects.

The breakdown of GDPR requests received by Banca Transilvania between 2022 and 2025 that were resolved in favor of customers/data subjects is provided below.

	2025	2024	2023	2022
Total number of requests/complaints regarding the processing and protection of personal data (GDPR requests) that were resolved in favor of the client/data subject*	3,933	4,539	3,248	3,116
GDPR requests received through the Center for Alternative Dispute Resolution in Banking (CSALB)	214 of which 166 were resolved in favor of the customer	132 of which 64 were resolved in favor of the customer	136 of which 72 were resolved in favor of the customer	75 of which 66 were resolved in favor of the customer
GDPR requests received through ANPC	29, of which 9 were resolved in favor of the client	15, of which 7 were resolved in favor of the customer	15 (of which 6 were resolved in favor of the client)	10 (of which 9 were resolved in favor of the customer)
GDPR requests received through the NBR	3, of which 1 was resolved in favor of the client	1, of which 0 were resolved in the client's favor	1	2 (of which 1 resolved in favor of the client)
Reports/complaints regarding unauthorized access to or disclosure of personal data/confidential information	71 of which 3 were resolved in favor of the customer	2	1	2
Investigation requests** received from ANSPDCP***	6	2 (following the submission by Banca Transilvania of 2 notifications of personal data breaches)	1	3

*The number of requests to exercise rights under the General Data Protection Regulation (GDPR requests) resolved in favor of data subjects (including requests to exercise rights regarding data processed in the Credit Bureau's records). Some of the cases recorded in internal systems as "resolved in favor of the customer" represent situations in which, although the Bank did not consider the claims to be valid, an attempt was made to offer a solution to the customer.

**Investigation requests are requests for information sent to Banca Transilvania (BT) by this authority, as applicable, following: BT's submission of notifications of personal data breaches pursuant to Article 33 of the GDPR or, as applicable, following the Authority's receipt of complaints from data subjects alleging non-compliant processing or protection of their data by BT or other entities of the BT Financial Group.

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

**** A resolution in favor of the customer does not necessarily imply an error on the part of the Bank.

Regarding other entities of the BT Financial Group, the situation regarding complaints resolved in favor of customers/data subjects concerning the exercise of rights guaranteed by legislation on the processing and protection of personal data is as follows:

	2025	2024
BT Direct	750 of the recorded requests were resolved in favor of the data subject	1,032 of the registered requests were resolved in favor of the data subject
BT Mic	22 of the requests filed were resolved in favor of the data subject	6 of the requests filed were resolved in favor of the data subject
BTAM	only one of the requests filed was resolved in favor of the data subject	None of the requests filed were resolved in favor of the data subject
BTCP	9 of the requests filed were resolved in favor of the data subject	9 of the registered requests were resolved in favor of the data subject
Salt Bank	19 of the requests filed were resolved in favor of the data subject	57 of the requests filed were resolved in favor of the data subject
Victoriabank	27 of the requests filed were resolved in favor of the data subject	4 of the requests filed were resolved in favor of the data subject
BT Leasing IFN	8 of the registered requests were resolved in favor of the data subject	None of the registered requests were resolved in favor of the data subject
BT Pensii	5 of the requests filed were resolved in favor of the data subject	Only one of the registered requests was resolved in favor of the data subject
BT Leasing Moldova	No requests of this type were received	No requests of this type were received
BT Broker	No requests of this type were received	None of the registered requests were resolved in favor of the data subject

Improvement Credit Collection	No requests of this type have been received	No requests of this type have been received

In 2025, 9 personal data breaches/thefts were identified across the entities of the BT Financial Group that posed risks to data subjects (4 breaches in 2024). These were managed and reported to the competent supervisory authority.

Internal communications regarding mandatory data protection training

Throughout 2025, the bank conducted a series of internal communications aimed at strengthening the organizational culture regarding the protection of personal data and compliance with GDPR requirements. The process began in late June with the launch of the mandatory module “Prevention and Management of Data Breaches 2025,” which emphasizes the importance of continuous training and incorporates the ANSPDCP’s recommendations regarding the increased frequency of training programs. To maintain the training pace and prevent potential delays, in September employees received an official notice regarding mandatory GDPR training. December 2025 concluded with a strategic communication aimed at reinforcing a culture of responsibility in the areas of security and compliance.



If the courses are not completed by the set deadline, the Bank has implemented a measure to block access to work systems until compliance is achieved.

Future Actions

In the coming period, the Bank will continue to strengthen organizational discipline in the area of data protection by conducting mandatory training programs for all employees of the BT Group, ensuring a uniform understanding of GDPR requirements and individual responsibilities.

In addition, the Chief Risk Officer will provide periodic updates on the risks associated with the processing of personal data, trends identified in incidents, and best practices for prevention, thereby contributing to maintaining a high level of compliance and strengthening the data protection culture throughout the organization.

Training

Minimum 95%: Completion rate for data protection training.

Deadline: Annual.

The target completion rate for data protection training, set at 95%, applies to entities in Romania, where GDPR requirements mandate formalized and periodic training. In 2025, the completion rate in Romania was over 99%, exceeding the set target.

In the Republic of Moldova, the subsidiaries' operations are conducted in accordance with local data protection legislation. Training programs are organized in a manner proportionate to the level of risk, targeting roles involving the processing of personal data or relevant operational responsibilities, to ensure an adequate level of compliance.

4. Governance Information

DR G1-1 – Business conduct policies and corporate culture

Banca Transilvania's corporate governance framework clearly defines the roles and responsibilities of its administrative, management, and supervisory bodies, with the primary objective of ensuring ethical business conduct and effective oversight. The Bank's strategic management is exercised by the General Meeting of Shareholders, which is responsible for setting strategic organizational objectives and allocating the necessary resources to achieve them. The powers of the Ordinary and Extraordinary General Meetings are governed by applicable laws and the Bank's Articles of Incorporation.

From an organizational standpoint, the Bank is structured into two main components: the management structure, consisting of the Board of Directors and the Leaders' Committee, and the operational structure, which includes the headquarters and the regional network of branches. The Board of Directors plays an essential role in overseeing the Bank's activities and ensuring strategic direction, while the Executive Committee is responsible for operational management, implementing the established strategy and managing day-to-day operations. To optimize performance, the Board of Directors has established specialized committees, such as the Audit Committee, the Compensation Committee, the Nomination Committee, and the Risk Management Committee, which contribute to good governance and effective risk management. The members of the Leaders' Committee, namely the CEO and Deputy CEOs, coordinate various areas of activity, promoting an organizational culture based on integrity and accountability.

Ethics and business responsibility are fundamental principles that guide the Bank's interactions with stakeholders and society at large. Adherence to ethical standards involves making decisions based on integrity, fairness, and transparency in all business practices, while also recognizing the impact of activities on employees, customers, suppliers, and the community.

The BT Financial Group has developed and implemented clear policies and procedures governing business conduct. The Board of Directors is responsible for approving and implementing the Code of Ethics and Conduct at the Group level, ensuring that the values and principles adopted by employees and management are upheld. This Code is aligned with the ethical and professional standards promoted in the financial and banking sector, in accordance with the guidelines and codes developed by the professional associations of which BT Financial Group is a member.

The Code of Ethics and Conduct govern essential aspects of business conduct, including relationships with suppliers, political activities, avoidance of conflicts of interest, fair competition, human resources policy, and the conduct of employees and members of the management and e bodies. All employees and members of management bodies are

required to know and comply with the provisions of the Code, and any violation will result in disciplinary action. This document does not replace the Internal Rules of Procedure (ROI) or the Organization and Administration Regulations (ROA), which govern operations, organization, employee and management responsibilities, corporate culture, and, finally, compliance with legal and ethical standards.

Compliance with integrity standards and the management of risks associated with non-compliant behavior are monitored by the Internal Audit Department and the Compliance Department. These departments conduct periodic audits and ensure that internal policies comply with external regulations, thereby contributing to the maintenance of an ethical and responsible work environment.

At the BT Financial Group level, the fight against bribery and corruption is governed by the ABC Commitment, also available on the Bank's website, which establishes reporting channels and procedures for reporting irregularities. The internal compliance framework includes the Code of Ethics and Conduct, the Whistleblowing Policy, the Policy on the Prevention and Management of Conflicts of Interest, the Public Procurement Policy, and specialized due diligence platforms used for third-party reputation screening. All employees and members of management are regularly informed and trained on these policies and are notified of any relevant legislative changes.

Within the BT Group, it is strictly prohibited to offer, accept, or solicit improper benefits in any form, regardless of whether they originate from the public or private sector. The following are expressly prohibited:

- Receiving money or benefits from customers or third parties in connection with the performance of job duties.
- Making payments or providing benefits that violate the law or Internal Rules of Procedure.
- Offering incentives to obtain business advantages.

Business conduct is subject to dual oversight at the subsidiary level. The General Shareholders' Meeting sets out the strategic direction, and the subsidiary management, composed of experts with relevant expertise, ensures the implementation and rigorous oversight of these principles within the operational framework.

The expertise of the administrative, management, and supervisory bodies regarding professional conduct.

The members of Banca Transilvania's Board of Directors have extensive experience in the banking sector, risk management, compliance, capital markets, and financial strategy development. Their qualifications and professional backgrounds, available on the Bank's website, align with the requirements of the Policy on the Assessment of the Suitability of Management Body Members at the Group level. With international careers and ongoing

training, they ensure effective governance, adapting to the dynamics of the financial market.

Similarly, the members of the Leaders' Committee possess expertise in areas relevant to banking such as financial management, audit, SME financing, retail banking, risk, compliance, and IT. Their educational backgrounds span fields such as economics, finance, accounting, law, marketing, and engineering, contributing to well-grounded leadership.

In 2025, members of BT's Leaders' Committee participated in 226 individual training sessions in essential areas such as anti-fraud, GDPR, compliance, sustainability, and leadership. Members of the management bodies of the Group's subsidiaries accumulated, in 2025 alone, over 540 hours of training in these key areas. Their expertise and conduct directly contribute to ensuring robust governance within the BT Financial Group, and the level of expertise varies among subsidiaries, depending on the specific characteristics of each market.

Policies in place to manage the material impact, risks, and opportunities related to business conduct and corporate culture

To manage the material impact, risks, and opportunities related to business conduct and corporate culture, Banca Transilvania and the BT Financial Group have implemented a robust framework of internal policies, which include:

1. Code of Ethics and Conduct – establishes the fundamental principles of integrity, responsibility, and transparency applicable to all employees and members of management.
2. Policy on the Assessment of the Suitability of Management Board Members – establishes the criteria for selecting and evaluating the professional competence, integrity, and ethical conduct of management board members within the Bank and its subsidiaries.
3. Anti-Bribery and Anti-Corruption Commitment – defines measures to prevent bribery, corruption, and conflicts of interest.
4. Whistleblower Policy – ensures a secure and confidential mechanism for reporting violations of ethical and compliance standards.
5. Conflict of Interest Prevention and Management Policy – sets forth measures to identify and eliminate conflicts of interest in the Bank's activities.
6. Public Procurement Policy – regulates supplier selection processes to ensure transparency and compliance with ethical standards.
7. Sustainability Policy – integrates ESG (environmental, social, governance) criteria into the organizational strategy and culture.
8. Data Protection and Privacy Policy – establishes rules for protecting the personal data of customers and employees.
9. Information Security Policy – focuses on protecting IT infrastructure and preventing cyber risks.

10. Internal Rules of Procedure and Organization and Administration Regulations – detail the rules of conduct, responsibilities, and expectations regarding organizational culture.

These policies are updated periodically and apply to Group entities, being communicated via the Bank's intranet to ensure compliance with ethical standards and a strong corporate culture. The implementation of these regulations through the Group relations policy and the risk management framework at the subsidiary level ensures a robust operational framework, delivering optimal results for customers, shareholders, and the business environment.

Establishing, Developing, Promoting, and Evaluating Corporate Culture

Corporate culture is anchored in the policy framework outlined above, which sets standards for integrity, professional ethics, social responsibility, and transparency. These policies and commitments are updated periodically to reflect both regulatory requirements and changes in the economic and social environment, as well as the evolution of the Bank and BT Group at various stages of their development.

The Board of Directors and senior management play a key role in developing and promoting the corporate culture by assessing how core values are implemented and upheld at all levels of the company. To ensure these principles are understood and embraced, regular training programs and sessions are organized at the Group level on topics such as compliance, sustainability, responsible leadership, and GDPR. These programs are accessible to all employees and are designed to reinforce organizational principles in day-to-day operations. Corporate culture is also promoted through various internal communication channels, including digital platforms, newsletters, regular meetings, and feedback sessions, which allow employees to stay informed about the company's initiatives and actively engage in its development.

To ensure continuous assessment of corporate culture, the Bank uses performance indicators. A key element is the collection of feedback through periodic surveys such as eNPS, which measure employee satisfaction and engagement levels. In addition, a series of relevant KPIs are monitored, such as the participation rate in training programs, the number of ethics reports, and employee retention rates. Periodic assessments conducted by the Board of Directors and management teams contribute to analyzing the state of the organizational culture, identifying areas for improvement, and adjusting strategies based on identified needs.

Mechanisms for reporting and investigating concerns regarding illegal conduct or conduct that violates the code of conduct or internal policies

To ensure a coherent framework for preventing, identifying, and managing incidents with a potential impact on compliance, business ethics, and operational security, the company

has established a series of formal reporting channels. These allow employees, collaborators and other relevant parties to report, in a confidential and, where appropriate, anonymous manner, situations such as violations of applicable laws, deviations from internal policies, suspicions of fraud, corruption, cybersecurity incidents, or other events with a negative impact.

To report irregularities, the Group makes the [Whistlelink](#) channel available to all stakeholders through a third party, which guarantees the confidentiality and protection of those who report issues. Whistlelink is a confidential reporting channel available to both business partners and BT Group employees for reporting potential fraud, violations of the Code of Ethics and Conduct, the Internal Rules of Procedure, or Internal Rules of Procedure specific to subsidiaries, as well as violations of the law (money laundering, bribery, etc.).

Through this application, reports can be submitted regarding legitimate and substantial concerns related to aspects of the business management framework, and all cases are reviewed by a specialized team, with each report receiving a unique code for tracking resolution. Reports are investigated by the appropriate departments, including the Bank's executive management. A face-to-face meeting can also be requested through the application.

During the meeting, the designated representative from the Corporate Governance and Non-Credit Legal Division, responsible for receiving the report, is required to prepare minutes documenting the information presented, in a durable and accessible format, subject to the consent of the person making the report. The reporting person will be given the opportunity to review and request corrections to the content of the minutes, as well as to express their agreement with them by signing. The procedure ensures compliance with the principles of confidentiality and the protection of the identity of persons submitting reports.

Throughout the reporting procedure, as well as after its resolution, any form of retaliation against the reporting person is strictly prohibited, in accordance with the provisions of Law No. 361/2022.

Specifically, reports concerning the subsidiaries BT Asset Management SAI and BT Capital Partners are redirected to their own reporting channels, namely MyAlertBTAM@btam.ro and myalert@btcapitalpartners.ro, to be handled in accordance with their own Internal Rules of Procedure.

In addition to the aforementioned channels, shareholders and investors may also submit reports, complaints, and grievances via email at investor.relations@bancatransilvania.ro. For other categories of stakeholders, reports and complaints may also be submitted through the BT call center.

In addition, for reports concerning ESG issues, the Group provides stakeholders with the email address: sesizariesg@btrl.ro.

Investigation of Incidents Related to Business Conduct

To ensure the prompt and fair investigation of incidents of misconduct, including corruption and the giving or receiving of bribes, the Bank implements a clear and rigorous procedural framework aligned with applicable legislation, including the provisions of Directive (EU) 2019/1937. This framework includes the following essential measures:

- **Secure and confidential reporting mechanisms** – The Bank provides secure channels for reporting incidents, protecting the identity of whistleblowers and preventing any form of retaliation.
- **Rapid Initial Assessment** – Reports are reviewed immediately to determine the severity and necessary actions, ensuring a prompt response.
- **Adherence to clear procedures and specific deadlines** – Investigations are conducted according to well-defined methodologies, within a reasonable timeframe, to ensure the efficiency and fairness of the process. The person making the report receives confirmation of receipt within 7 calendar days at the latest, and feedback on the progress of the case and any measures taken is provided within a reasonable timeframe, not exceeding 3 months from the confirmation (or from the expiration of the 7-day period). In the case of in-person meetings, within no more than 7 days of the request, the person will be informed of the proposed date and location for the reporting session. Reporting via an in-person meeting will take place within no more than 15 days of the date the request was submitted through the reporting channels.
- **Collection and analysis of relevant evidence** – All available data and documents are analyzed, including statements, records, and other evidence necessary for a proper assessment.
- **Transparency and communication** – The parties involved are notified of the progress of the investigation, while maintaining the necessary confidentiality.
- **Adoption of corrective and disciplinary measures** – Depending on the investigation's findings, the Bank applies appropriate measures.
- **Monitoring and continuous improvement** – Investigation procedures are periodically reviewed to identify and correct any deficiencies, thereby ensuring an efficient process that complies with applicable regulations.

Additionally, subsidiaries operating under the authorization, regulation, and/or supervision of the ASF and providing non-banking financial services to individuals or legal entities acting as consumers have implemented a procedure for receiving and resolving complaints, in accordance with the applicable legal framework.

The Legal, Digitalization, and Payment Services Department is responsible for analyzing and reporting all recorded warnings and investigated incidents at the BT Group level, as follows:

- Annually, in the first quarter of the following year to the Board responsible for analyzing and approving the report and, if necessary, ordering the adoption of measures at the BT Group level.
- Quarterly, to the Leaders' Committee.
- Whenever necessary, to the Leaders' Committee, in cases where alerts are significant and incidents are reported that could seriously affect the Group's reputation;
- Whenever necessary, to the National Bank of Romania – Supervision Directorate, in the event of legitimate and substantial concerns that could affect the Bank's safety, soundness, and reputation.

Training Policy on Business Conduct

The management of the subsidiaries participates annually in professional training and development programs tailored to their field of activity and position, with an emphasis on avoiding conflicts of interest, preventing fraud, and AML and KYC policies. The activities of key functions, such as compliance, risk management, internal control, and audit, are governed by rules and regulations issued by supervisory authorities, such as ASF, BNR, or BNM, requiring the maintenance of a high level of training through periodic programs.

Within Banca Transilvania, the BT Academy offers mandatory and optional courses on business ethics, managed by the HR Department, which oversees the functional structure and professional development of employees. Furthermore, in accordance with the selection and succession planning policy, the Bank implements an annual plan to identify and train future leaders, ensuring the continuous development of 1–3 successors for each key role through career management, specialized training, and involvement in strategic projects.

As for the subsidiaries, their staff and management participate at least annually in professional training and development programs, in accordance with their areas of expertise and fields of activity.

At the same time, training programs dedicated to business ethics and professional conduct contribute to strengthening the organizational culture and aligning employee behavior with applicable standards. By including relevant topics such as managing conflicts of interest, risks associated with certain activities, and compliance requirements regarding anti-money laundering, these trainings support the prevention and effective management of operational and reputational risks, reinforcing the Group's commitment to integrity and professional responsibility.

Policies and procedures established for the prevention, detection, and resolution of allegations or incidents of corruption or bribery

BT Group has a regulatory framework for preventing, detecting, and resolving incidents of corruption and bribery, based on a zero-tolerance policy toward such acts. The primary reference document is BT Group's Code of Conduct and Ethics, which establishes general guidelines in this area, in accordance with national and European regulations.

The internal policy on fraud risk management clearly defines corruption as any form of abuse of power exercised for the purpose of obtaining personal or Group benefits, manifested through the offering, promise, solicitation, or receipt of undue benefits, directly or indirectly. The Group acknowledges that the line between unethical behavior, corruption, and fraud is sometimes not well understood, as these behaviors are interdependent, and tolerating unethical practices can increase the risk of corruption and, consequently, give rise to fraud risks.

In this context, the internal governance framework and anti-corruption policies establish clear rules for preventing, identifying, and sanctioning acts of corruption, applicable to all employees and individuals acting on behalf of the Group. Internal policies and procedures underpin the application of the zero-tolerance principle toward corruption and support an organizational culture based on ethics, integrity, and accountability.

The procedure for conducting investigations at the BT Group level defines a uniform standard within the Bank regarding the reporting, investigation, and inquiry of fraud-related events and outlines the tasks and responsibilities of each BT Group structure or entity with duties within these processes.

Investigation of Corruption-Related Incidents/Events

The process of investigating corruption-related incidents or events is conducted based on internal procedures that guarantee the independence of the investigation, compliance with applicable legislation, and the protection of the fundamental rights of the individuals involved.

Regardless of how the investigation is initiated (complaint, report, or ex officio), if, before the investigation begins or during its course, indications arise regarding the direct or indirect involvement of a member of the Board of Directors (BoD), the Leaders' Committee (LC), a Senior Executive Director, Executive Director, Coordinating Director, Director, or Deputy Director within BT/BT Group, it is mandatory to obtain approval to continue the investigation from the competent bodies or persons, through the management of the Audit Department (AD), as follows:

- The Board of Directors (BoD) of BT - in cases where the person involved is a member of the Board of Directors of BT (the decision to be made without the presence or knowledge of the respective member), of the Board of Directors of any subsidiary of BT Group, of the BT Leaders' Committee (MC), or is a Senior Executive Director/Executive Director of BT;
- The CEO and Deputy CEO, CRO - in cases where the person involved is a Managing Director, Director, or Deputy Director within BT/BT Group;
- The Deputy CEO, CRO - with respect to other BT/BT Group employees, only in cases where the investigation is initiated on the CRO's own initiative.

These measures ensure the integrity of the investigation process, preventing conflicts of interest, and maintaining the objectivity of investigations within the Group.

If a report does not clearly indicate a suspicion of fraud, the anti-fraud department may conduct preliminary checks to properly classify the incident (suspicion of operational error, disciplinary violation, etc.), and depending on the outcome, it may initiate an investigation, refer the report to other relevant departments, or close the case if the suspicions are not confirmed. Investigations are aimed exclusively at clarifying the facts and do not target individuals or BT/BT Group employees.

Appointment of Investigators

Investigations may be conducted by:

- Internal investigators, typically employees of the Anti-Fraud Department (AFD). AFD employees report functionally to the Anti-Fraud Director and administratively to the Deputy CEO, CRO, a key autonomous position that reports to the governing bodies (the Leaders' Committee and the Board of Directors) to ensure the accuracy and fairness of the conclusions.
- External investigators, namely third parties authorized by the Bank in accordance with applicable law. In this case, the Bank always designates an internal representative from the DA or from the department that reported the case as the contact person for the duration of the investigation.

Regardless of their origin, investigators are required to conduct the investigation in a detailed and systematic manner, in compliance with the law and respect the individual rights (including privacy and personal life), collecting all relevant evidence and maintaining the independence of the process.

The process of reporting results to administrative, management, and supervisory bodies

Preparation and submission of the investigation report

Upon completion of the investigation, a formal report is prepared and submitted to:

- To decision-makers, for the implementation of appropriate measures or for information purposes, depending on the conclusions;
- Other departments, divisions, business lines, or subsidiaries of the BT Group, if the investigation revealed issues of interest to them. In such cases, the investigator/team may propose the distribution of the information (in full or in the form of a memo/excerpt/email). The proposal is subject to approval by the Board of Directors, the Audit Committee, the CEO, or the CRO, as applicable.

If the investigation highlights issues regarding internal processes or the organization of activities, the report is forwarded to the director of the responsible department, so that the information may be utilized in the performance of the duties set forth in the ROA.

Procedures Following Report Approval

All approved reports are submitted to the Operational Risk Committee (CRO). For reports containing proposals to modify or supplement the processes/workflows/procedures related to which fraud occurred, the following steps are taken to prevent recurrence:

1. Within a maximum of two months of the report's approval, AFD, together with the process/procedure/workflow responsible, establishes a plan for implementing corrective measures, with clear deadlines.
2. The plan is submitted to the CRO for approval, at which point the committee may make additional requests, which are subsequently included in the final version.
3. The AFD and the process owners report to the CRO:
 - the status of implementation at each deadline specified in the plan,
 - any changes or delays that have occurred, for approval.
4. If the AFD does not receive feedback within the timeframe specified in point 1 or if the method of implementing the measures cannot be agreed upon, the AFD sends to the CRO a memo describing the situation for a decision.

Conflict of Interest

At the BT Group level, the issue of conflicts of interest is primarily addressed through the Code of Ethics and Conduct, and the subject is also covered in other specific regulations adopted at the group level that address compliance risk. Additionally, the Policy on the Prevention and Management of Conflicts of Interest at Bănci Transilvania S.A., which

applies directly to subsidiaries, describes the circumstances in which conflicts of interest may arise and how they should be managed.

Employees within the BT Group must complete the conflict-of-interest declaration in the dedicated IT application, including those who do not identify such situations. Employees must report any existing or potential conflict of interest, concerning themselves or other employees, to their direct supervisor and to management.

The authority to assess potential conflicts of interest lies with various committees, depending on the category of personnel concerned, as follows:

- For members of management bodies, the assessment is conducted by the Compensation Committee and the Nomination Committee.
- For Executive Directors and members of the management body, the authority to assess lies with the Board of Directors.
- For staff in management positions, such as agency or branch managers, the analysis is conducted by the Leaders' Committee.
- For staff in operational and lower management roles, the Human Resources Committee is responsible for the analysis.

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In 2025, at the Group level, no reports were received regarding the existence of potential conflicts of interest.

Communication of corruption prevention and detection policies to relevant individuals

The responsibility for adopting the internal regulatory framework lies with the management of each entity within BT Group. The primary channel for disseminating the Group's resources regarding applicable regulations is the Bank's intranet.

Thus, in accordance with the Policies on Group Relations and the risk management framework at the BT Group level, the Bank's Internal Rules of Procedure, which are also applicable at the subsidiary level, are posted on the BT Intranet in the "Joint Subsidiary Regulations" section and communicated via email to their management.

For subsidiaries that do not have access to the BT network, the Internal Rules of Procedure Management Service within the Compliance Department, together with the IT Operations Department, the Information Security Department, and the non-banking subsidiaries of the BT Financial Group, collaborate to identify the most effective methods for disseminating relevant regulations. The issuing department within the Bank identifies the scope of the regulations and forwards them to the subsidiaries, which analyze the impact on their own methodological framework and implement any necessary adjustments; these adjustments must be approved internally, but no later than the second meeting of the subsidiary's Board of Directors following notification. The subsidiaries confirm their approval to the Financial

Subsidiaries Department/Investment Subsidiaries Department at BT, which monitors the implementation of the requirement.

In the case of similar activities not covered by regulations applicable to the entire Group, the department responsible communicates the principles of uniform operation to the subsidiaries, and they adjust or issue their own regulations, in accordance with the workflow regarding Group Relations Policies and the risk management framework. Subsidiaries classified as financial institutions align their Internal Rules of Procedure with the requirements of the BT Financial Group.

Nature, scope, and depth of anti-corruption or anti-bribery training programs

The training programs developed at the group level regarding anti-corruption or anti-bribery training address the main challenges that may be encountered in the company's day-to-day operations, namely:

- Fraud and corruption
- Fraud prevention
- Prevention of money laundering and terrorist financing
- Know Your Customer
- Prevention and management of conflicts of interest.

All these programs cover a variety of topics, depending on the difficulty level of the course (i.e., beginner, intermediate, or advanced), and include elements of the internal procedures in place to prevent illegal or unethical behavior.

Furthermore, where it is not possible to conduct such training and development programs based on internal expertise, third-party training services are utilized to ensure the necessary knowledge and expertise within the companies of the BT Group.

Management receives ongoing training and professional development just like the Group's employees, but the topics of these programs are tailored to the scope of responsibilities within the company, the nature of its business, and the expertise of the individuals holding these positions.

Positions with the highest risk of corruption and bribery

Within the BT Financial Group, the roles with the highest risk of corruption and bribery are those involved in financial decision-making, loan approval, managing relationships with large clients, and procurement. These include the area of retail credit analysis, where employees may be exposed to the risk of receiving bribes for approving ineligible loans, and the Procurement, Investments, and Logistics Department, where there is a risk of favoring certain suppliers.

Additionally, commercial banking for legal entities, including the Large Corporate Clients, SME, and Agribusiness segments, presents a high risk, as account managers may be influenced to grant preferential terms. The Compliance Department and the Internal Audit Division, although they play a preventive role, may be exposed to the risk of corruption for concealing certain irregularities, and top management positions, having decision-making power over financial strategies, have the potential to be influenced in favor of private interests.

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In 2025, 95% of positions exposed to risk were covered by training on corruption-related issues, compared to 90% in 2024

2025	At-risk functions	Managers	AMSB	Other own workers
Training coverage				
Total	10,067	606	52	3,654
Total receiving training	9,537	542	39	3,203
Delivery method and duration				
Classroom training	1,551	130	3	4
Computer-based training	84,800	2,802	276	15,566
Frequency				
How often training is required	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly
Topics covered				
Prevention and Combating of Money Laundering (AML)	✓	✓	✓	✓
Anti-fraud	✓	✓	✓	✓
Conflict of Interest	✓	✓	✓	✓
Know Your Customer (KYC)	✓	✓	✓	✓
Code of Conduct, Conflict of Interest, Whistleblowing Policy	✓	✓	✓	✓

*The total number of employees in each category represents active employees as of December 31, 2025.

**Depending on the type of course, their frequency may be annual, semiannual, or quarterly.

2024	At-risk functions	Managers	AMSB	Other own workers
Training coverage				
Total	9,968	706	45	3,950
Total receiving training	8,968	525	36	2,534
Delivery method and duration				
Classroom training	18,148	151	-	506
Computer-based training	36,495	1,756	131	7,652
Frequency				
How often training is required	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly
Topics covered				
Prevention and Combating of Money Laundering (AML)	✓	✓	✓	✓
Anti-fraud	✓	✓	✓	✓
Conflict of Interest	✓	✓	✓	✓
Know Your Customer (KYC)	✓	✓	✓	✓
Code of Conduct, Conflict of Interest, Whistleblowing Policy	✓	✓	✓	✓

*The total number of employees in each category represents active employees as of December 31, 2024.

**Depending on the type of training, the frequency may be annual, semiannual, or quarterly.

Note: Comparative figures have been updated following a methodological review conducted in 2025, which included a more detailed analysis of risk-exposed functions within the BT Group and the harmonization of data with consolidated databases regarding participation in training programs. This update reflects an improvement in the process of collecting and aggregating data at the Group level.

Actions and resources for managing material impacts, risks, and opportunities related to corruption and bribery

In 2024, Banca Transilvania implemented a well-structured action plan to manage the material impact, risks, and opportunities related to corruption and bribery. Key measures included the ongoing organization of mandatory employee training, with a focus on high-risk areas, as well as the conduct of annual internal audits of procurement and contracting processes to identify potential irregularities.

Additionally, in 2024, a rigorous system for reviewing supplier relationships through due diligence and reputational screening was implemented using the RiskRate application, which helps the Bank prevent exposure to fraud, acts of corruption, and other reputational risks. These measures are applied across the entire Group and the Bank's value chain, having a direct impact on employees, suppliers, and customers.

In the procurement area, Banca Transilvania applies clear criteria for contract approval through its internal procedure for the procurement of works, goods, and services. Prior to approving a procurement, the procurement officer or internal beneficiary submits a request regarding potential conflicts of interest and reputational risks associated with the winner of the procurement procedure, the shortlisted finalists, or the supplier whose contract is being extended or awarded directly. The Bank has established a timeline for optimizing actions, which includes:

- Improving the anonymous reporting application for suspected corruption to ensure a more efficient and secure process;
- **Updating the Code of Ethics and Conduct** to reflect the latest regulations and best practices;
- Calibrating the due diligence application for contractual partners, followed by auditing suppliers and optimizing the database;
- **Integrating subsidiaries into the system**, thereby expanding visibility and control over contractual partners;
- Introducing a mandatory training course for employees focused on preventing bribery and corruption (Anti-Bribery and Corruption – ABC).

In addition, as a remedial measure, the Bank maintains active cooperation with the competent authorities in cases of identified corruption or bribery. The implementation of this plan is carried out within the budgetary limits established by Banca Transilvania, ensuring the efficient use of resources to strengthen organizational compliance and integrity.

DR G1-4 – Incidents of corruption or bribery

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In 2025, at the BT Group level, there were no:

- convictions for violations of anti-corruption and anti-bribery laws.
- Financial penalties for violations of anti-corruption and anti-bribery laws.

During the 2025 fiscal year, the Bank provided training to its employees who are at risk regarding its policy. For these risk-exposed positions, training is mandatory, but the company also made voluntary training available to other employees.

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In 2025, the total number of training hours on corruption-related issues was twice as high as in 2024, 39,030 hours compared to 17,747 hours.

Relationship with Suppliers

The relationship with suppliers is managed within Banca Transilvania through a procurement process governed by internal rules and procedures dedicated to the procurement of works, goods, and services. Procurement covers a wide range of categories, such as investments and logistics, IT, human resources, marketing and communications, information security, legal services, and retail operations. The process is coordinated centrally by the procurement departments, in collaboration with specialized divisions that manage specific types of procurement, depending on the nature of the goods or services being contracted.

Supplier selection is typically conducted through a competitive process, which involves evaluating multiple bids and utilizing digital tools dedicated to procurement management. For high-value contracts, additional compliance checks are performed, including an analysis of potential conflicts of interest and reputational risks.

Sustainability criteria are also gradually being integrated into supplier relationships by collecting information on their environmental, social, and governance practices and by including relevant elements in the evaluation process. Aspects such as the existence of environmental management systems, the energy efficiency of products, or compliance with labor conditions are taken into account in the supplier analysis.

At the same time, the Bank works extensively with local suppliers. In 2025, 97% of the Bank's suppliers were based in Romania, a share that reflects the predominantly local structure of the Bank's supply chain.

4.1 Combating Financial Crime

Combating money laundering, corruption, and terrorist financing

External Regulatory Framework

The Group operates within a European and national regulatory framework applicable to the prevention and combating of money laundering, corruption, and terrorist financing, in accordance with international standards and European Union requirements regarding AML/CFT.

At the European Union level, the regulatory framework consists of the AML legislative package adopted in 2024, which includes Regulation (EU) 2024/1624 on the prevention of the use of the financial system for the purposes of money laundering and terrorist financing, Directive (EU) 2024/1640 on national mechanisms for preventing and combating AML/CFT, as well as Regulation (EU) 2024/1620 establishing the European Anti-Money Laundering and Counter-Terrorist Financing Authority (AMLA). This framework replaces and strengthens the previous regime established by Directive (EU) 2015/849, as amended by Directive (EU) 2018/843.

At the national level, European requirements are implemented through applicable primary and secondary legislation, including Law No. 129/2019, as subsequently amended and supplemented, until the date of full transposition of the new European requirements.

In Romania, the competent authorities have intensified their AML/CFT supervision and control activities in recent years, including in applying the international sanctions regime.

Compliance with this framework requires the implementation of robust governance mechanisms, effective internal processes for identifying, assessing, and mitigating ML/FT risks, as well as significant investments in IT systems and technological solutions for monitoring, screening, and reporting. At the same time, it is necessary to allocate dedicated resources for prevention, continuous monitoring, and reporting to competent authorities.

Internal Regulatory Framework

The Group has implemented a unified internal system for preventing and combating money laundering, terrorist financing, corruption, and violations of international sanctions regimes, designed in accordance with applicable legal requirements and best practices in the field of AML/CFT. The system is built on an integrated, risk-based approach, supported by a unified framework of common rules, policies, and procedures applicable to Group entities, as well as by adequate internal controls.

This framework applies across the entire organization, including employees, management structures, and suppliers, and is supported by clear governance structures, well-defined responsibilities and monitoring/control mechanisms. The measures implemented

contribute significantly to reducing compliance and financial crime risks, though they cannot eliminate them entirely, given the complexity, dynamics, and continuous evolution of financial crime patterns.

At the BT Group level, the AML/CTF framework is integrated into a broader system of compliance, ethics, and accountability, which also includes anti-corruption measures, compliance with applicable legislation and competition rules, management of conflicts of interest, ensuring political neutrality, information security, protection of personal data, and respect for human rights.

Banca Transilvania has an internal regulatory framework structured around four main pillars that support the management of compliance and financial crime risks:

- regulations regarding know-your-customer
- policies related to the compliance function
- policies dedicated to the prevention of money laundering and terrorist financing
- general policies applicable across the entire organization

This set of regulations ensures a consistent approach that is aligned with legal requirements, helping to strengthen governance and a culture of compliance within the Bank.

Know Your Customer

The customer due diligence process aims to identify, analyze, and assess the risks associated with each customer prior to establishing or continuing a business relationship, by applying proportionate customer due diligence measures.

As defined by the Bank, the term “customer” includes any natural person, legal entity, or unincorporated entity with which the Bank conducts business relationships or with which it carries out other operations on a permanent or occasional basis. A customer is any person with whom, during its activities, the Bank has negotiated a transaction, even if that transaction was not finalized, as well as any person who benefits or has benefited in the past from the Bank’s services. Persons who hold only the following capacities are not considered clients: legal representative, authorized representative, delegate, beneficial owner, user of supplementary cards, guarantors/sureties/co-debtors in credit agreements.

Banca Transilvania accepts as customers:

- resident or non-resident individuals, provided they submit identification documents to the Bank and request the establishment of a business relationship;
- adult resident individuals who apply to establish a business relationship through digital channels;
- resident legal entities that prove, based on the documents submitted, their legal establishment and operation;

- resident legal entities applying to establish a business relationship through digital channels, provided the following conditions are met: the sole director and shareholder is a resident natural person, with no identified risk factors;
- non-resident legal entities that submit to the Bank documents proving their legal establishment and operation, in a notarized certified translation;
- any person or entity that uses a service or product offered by the Bank, whether or not the transaction involves opening a checking account.

Establishing a business relationship with clients entails the following requirements:

- identifying customers and verifying their identity;
- identifying the risk factors associated with customers;
- classifying customers into the associated risk score/category;
- establishing the hierarchical level of approval for accepting customers, namely:
 - the authority to verify and sign account opening documentation/supervision via the onboarding application;
 - the authority to approve the initiation of the business relationship, based on the assigned risk score/category;
- adopting decisions, highlighting the hierarchical positions, tasks, and level of responsibility assigned to the structures/persons involved in the application of customer due diligence measures.

During the enrollment and account opening/data update phase, the following requirements must be met:

- identifying risk factors associated with risk categories and automatically calculating the final risk score assigned to the customer based on the criteria in the risk matrix;
- classification into risk categories based on the calculated risk score;
- the authority to verify and sign account opening documentation, as well as supervision via the onboarding application;
- the authority to approve the initiation/continuation of the business relationship.

High-risk customers include, among others, non-residents, customers providing money or value transfer services (MVTs), entities providing financial services such as currency exchange, money transfers, or the issuance of payment instruments (MSB), politically exposed persons, and correspondent banking institutions. Enhanced due diligence measures apply to these customers, consisting of senior management approval, product allocation based on eligibility criteria, and continuous, risk-based monitoring of transactions.

The process of updating data at the customer portfolio level is carried out according to the assigned risk level, namely:

- high-risk clients / clients in the high-risk and very high-risk categories: annually;
- medium-risk customers / those in the standard-risk categories: every 3 (three) years;
- low-risk customers / from the low-risk categories: every 5 (five) years.

Assessment of ML/TF risks and international sanctions across the entire business

The Bank's risk-based assessment is a process through which the threats and vulnerabilities to which the Bank is exposed are identified, and the probability and impact of money laundering and terrorist financing risks are evaluated. Based on this assessment, high-risk areas are identified, which must be mitigated through proportionate measures and a continuous monitoring process.

The Bank conducts an ML/FT and international sanctions risk assessment across its entire operations considering risk factors such as: customer type, products/services, transactions, geographic areas, distribution channels, and risks related to territorial units. Stress tests are incorporated into the assessment processes to analyze the impact of increased transaction volumes, emerging patterns, systemic failures, and regulatory changes; the results are used in the strategic decision-making process, as well as to define remedial measures and optimize resource allocation.

As part of the ML/FT risk assessment process, the inherent risk associated with relevant risk factors is identified and evaluated; subsequently, the effectiveness and adequacy of existing controls are analyzed to determine the residual risk level, which reflects the actual exposure after the application of mitigation measures. ML/FT risk monitoring consists of actions to monitor the status of implementation of ML/FT risk mitigation measures and periodic testing of ML/FT risk mitigation measures to verify/identify whether: i) the Bank's own risk assessments and the methodology for conducting and updating them are relevant, and ii) there is a need to update the risk assessment. The Bank's ML/FT risk assessment, in accordance with the methodology, is updated annually or at 12–18-month intervals (depending on national assessments or feedback from the supervisory authority), as well as whenever necessary, depending on legislative developments at the national and European levels or operational changes at the Bank regarding customers, products, transactions, distribution channels, and geographic areas.

Product Governance

As part of the compliance risk management and product governance process, digital projects affecting the corporate and retail business lines are analyzed by the Compliance Division from a compliance risk perspective. This assessment aims to ensure that new initiatives or proposed changes comply with legal requirements regarding know-your-customer, anti-money laundering, and counter-terrorist financing.

Compliance risk opinions are issued as early as the initial stages of project development. Subsequently, product assessment documentation is prepared, based on which the compliance risk level for each banking product or service is determined, in line with the criteria set forth in Internal Rules of Procedure.

The assessment process focuses on identifying areas requiring additional risk management measures in the KYC/AML/CFT and international sanctions domains. The Compliance Division proposes proportionate monitoring and mitigation actions, depending on the identified cases. If the identified risks cannot be adequately mitigated, a negative compliance opinion may be issued, resulting in the non-approval of the launch of the respective product or service.

Classification of products based on ML/TF risk

Banking products are classified into risk categories based on a score derived from the assessment of their characteristics and the risks associated with their use from the perspective of money laundering, terrorist financing, and international sanctions. The assigned risk level determines the corresponding level of monitoring, the application of control mechanisms, and the approval level.

Low risk level: products that, by their nature and manner of use, present non-existent or insignificant risks. They allow for the full application of KYC measures, transaction monitoring, and record-keeping (e.g., mortgage loans for individuals, Credit Noua Casă, IMM Invest loans, bancassurance products, payroll distribution agreements).

Medium-low risk: products that involve minor but manageable risks from an AML/CFT perspective. They allow for the application of standard customer due diligence measures and adequate transaction monitoring (e.g., letters of credit, time deposits, savings accounts, working capital loans, credit cards, SME factoring).

Medium risk level: products that, depending on the nature and volume of use, may pose controllable but higher risks, requiring increased monitoring and the application of standard and additional due diligence measures (e.g., cash transactions, international transfers, currency exchange, BT Pay, internet banking, instant transfers, Western Union).

Medium-high risk level: products that may generate significant risks and for which there are limitations in the full application of identification, monitoring, or control measures. They require additional controls and approval at a higher management level.

High risk level: products that pose major or unacceptable -related risks, either due to control limitations or exposure to jurisdictions or activities with very high ML/TF risk. These are not undertaken by the bank without special approval or may be excluded from the offering.

The bank does not hold products classified as medium-high or high risk in its portfolio.

Roles and Responsibilities

The compliance function is organized centrally and is independent, reporting to the Deputy CEO and Chief Risk Officer, who is not involved in business activities and is responsible for coordinating risk management and the internal control system. The compliance function reports directly to executive management (the Leaders' Committee) and indirectly to the Board of Directors, in line with the requirements regarding the independence of the compliance function.

Main responsibilities of the Compliance Division:

- ensuring the implementation of compliance function requirements within the Bank, an independent Level II internal control function, as defined in the Compliance Policy of Banca Transilvania S.A.;
- assessing, quantifying, managing, and reporting compliance risk, both in the area of general compliance, including MiFID, and in the KYC/AML/CFT area;
- identifying compliance risk through continuous monitoring and Level II compliance control activities;
- approving new products or significant changes to existing products, processes, and systems;
- receiving draft Internal Rules of Procedure from the Bank's specialized organizational units and submitting them (depending on the assigned authority/mandate) for review/approval by the Leaders' Committee and the Board of Directors, respectively;
- managing the entire portfolio of Bank Transilvania's Internal Rules of Procedure;
- ensuring Banca Transilvania's compliance with legal requirements regarding know-your-customer (KYC), the prevention and combating of money laundering and terrorist financing, and the enforcement of international sanctions;
- monitoring the branch customer portfolio for compliance with KYC standards and identifying associated risks;
- maintaining relationships with competent authorities (e.g., ONPCSB) and managing requests regarding the accounts and activities of targeted customers;
- conducting training for all Bank staff on General Compliance and KYC/AML/CFT issues, and testing their knowledge following the training;
- developing the Annual Compliance Program;
- coordinating the alignment of principles regarding the compliance activities of Banca Transilvania's subsidiaries, both in terms of compliance risk management and

control, as well as standards for KYC and AML and counter-terrorist financing, including by providing specific support upon request; collaborating with other internal control functions, risk management and internal audit, on specific issues, whenever necessary.

AML/CFT governance is ensured through periodic reporting to senior management and relevant committees, clear mechanisms for escalating significant deficiencies, the involvement of the internal audit function in assessing the independence and effectiveness of the control framework, as well as through the systematic monitoring of identified deficiencies, followed by the implementation and tracking of remedial measures, in line with applicable prudential supervisory requirements.

At least once a year, the Coordinating Director of the Compliance Division submits an annual compliance report to management, which includes an assessment of the Bank's exposure to money laundering and terrorist financing risks, the level of residual risk, proposed or implemented mitigation measures, the status of their implementation, as well as other relevant aspects regarding the effectiveness of the AML/CFT governance and control framework.

Monitored indicators

The Bank tracks an extensive set of indicators in the areas of KYC/AML/CFT and international sanctions on a quarterly basis, which are subject to reporting to the supervisory authority. These are used to assess the effectiveness of the control framework and to identify areas requiring strengthening, operational optimization, or additional resource allocation.

CUSTOMERS	2025	2024
% of total customers of non-resident customers	2.10	1.76
% of total customers with origin/citizenship/residence/country of registration in countries identified by the European Commission/FATF as high-risk countries or as having strategic deficiencies in AML/CFT	0.31	0.15
% of total customers of customers having at least 1 beneficial owner with origin/citizenship/residence in countries on the list of countries identified by the European Commission/FATF as high-risk countries or as having strategic deficiencies in AML/CFT	0.35	0.19
% of total customers of customers having at least one non-resident beneficial owner	0.45	0.40
% of total non-resident customers of customers with residence/country of registration in offshore countries	0.27	0.24

% of total clients of private banking clients	0.11	0.10
% of total private banking clients of non-resident private banking clients	3.29	3.27
% of total customers of PEP customers	0.04	0.03
% of total PEP customers of non-resident PEP customers	1.99	1.53
% of total customers of customers with RTS during the reference period	0.0297	0.02
% of total customers with requests for information from authorities during the reference period	0.00962	0.01071
% of total customers who are in risk classes higher than the medium/standard/ordinary/normal category	2.73	2.50
% of total customers in risk classes lower than the medium/standard/ordinary/normal category	91.35	88.07
% of total customers who hold/have held accounts in foreign currency only	0.18	0.20
% of total customers with data not updated within the timeframe specified by Internal Rules of Procedure	0.49	0.98
% of total customers in risk classes higher than the medium/standard/usual/normal category at the end of the reference period/at the time of closing the business relationship of customers in risk classes higher than the medium/standard/ordinary/normal who held at least 1 high-risk product at the end of the reference period/at the time of closing the business relationship	0	0
% of total corporate and similar customers of payment institutions and electronic money institutions	0.00160	0.00035
% of total customers of payment institutions and electronic money institutions of non-resident customers of payment institutions and electronic money institutions	10.00	0
% of customers with a newly opened account in the customer portfolio (number of new customers / (number of customers in the reference period – number of closed accounts))	9.74	10.35
% of total customers to whom simplified customer due diligence measures are applied	0	0
Customers for whom a decision was made to initiate/continue the business relationship in the context of an unfavorable ML/FT opinion during the reporting period	4	0
Relationships rejected (not initiated or not maintained) due to incomplete customer information/inability to apply standard customer due diligence measures	94	16

PRODUCTS/SERVICES	2025	2024
Products assessed as high risk at the end of the reporting period	0	0
% of total customers in risk classes higher than the medium/standard/ordinary/normal category at the end of the reference period of customers in risk classes higher than the medium/standard/ordinary/normal category who held at least one of the IB/MB products	67.03	74.50
% of customers with increased card limits during the reference period out of the total number of customers holding at least one card	10.99	10.19
% of customers with increased IB/MB transaction limits during the reference period out of the total number of customers holding at least one of the two products (IB/MB)	0	0
% of customers holding at least one of the IB/MB products at the end of the reference period out of the total number of customers in the portfolio at the end of the reference period	46.11	51.62

Audit reports that included the assessment of KYC/AML/CFT processes/components/structures among their objectives	Internal Auditor (2025)	Internal Auditor (2024)
Number of audit engagements scheduled during the reporting period, including KYC/AML/CFT reviews (including at the level of relevant IT applications)	28	28
Number of actions performed during the reporting period, including KYC/AML/CFT checks (including at the level of relevant IT applications)	30	31
Total number of KYC/AML/CFT-related recommendations issued during the reporting period as part of these actions	47	33
Total number of KYC/AML/CFT-related recommendations for which an extension of the initially set implementation deadline was approved during the reference period	0	1
Total number of recommendations related to KYC/AML/CFT that have reached their deadline and remain unimplemented	0	0

Training

Banca Transilvania ensures, through its Compliance Division, ongoing training for all BT Financial Group personnel across all lines of defense. Within the Bank, staff training on matters related to know-your-customer standards, anti-money laundering, and counter-terrorist financing is conducted by: The Compliance Division, which is responsible for ensuring and monitoring employee training on issues related to know-your-customer standards and the prevention and combating of money laundering, as well as the financing of terrorist acts, across the entire BT Financial Group; The Deputy Director of Operations / Head of Operations / mentor, who are the individuals responsible for training employees at

each branch on issues related to know-your-customer standards and the prevention and combating of money laundering, as well as the financing of terrorist acts. The Risk / Compliance Director / Compliance Officer of each subsidiary, who is responsible for training employees to comply with requirements regarding customer due diligence standards and the prevention and combating of money laundering within the subsidiaries.

The staff training and testing program includes topics with appropriate levels of complexity and frequency, differentiated according to the type of responsibilities and specific competencies of the positions, across all lines of defense. Staff training on KYC/AML/CFT issues is determined based on the skills required for an employee to properly perform tasks in this area, depending on the compliance responsibilities established in the job description and the level/type of knowledge identified following the analysis of the assessment results. The assessment of knowledge regarding the prevention and combating of money laundering and terrorist financing is conducted annually for all eligible and active staff of the Bank, with the testing tailored to the specific knowledge level of each Group. The calculation and reporting of participation rates in the annual testing will be carried out in accordance with the quantitative assessment criteria, and the objective is considered achieved when: $\geq 90\%$ of all eligible staff participate in the courses intended for all BT Group staff; $\geq 95\%$ of scheduled staff participate in the mandatory tests.

Planned actions to improve performance in combating financial crime

The Group plans to implement a unified KYC process for shared customers, based on a single risk scoring model that applies uniformly across all entities. This initiative aims to standardize customer risk assessment criteria, reduce differences in approach among entities, and consolidate a unified perspective on the Group's exposure to money laundering and terrorist financing risks.

The single scoring model will integrate a coherent set of risk factors, including customer type, geographic exposure, products and services used, transactional behavior, and other relevant indicators, in accordance with the risk-based approach principle.

The implementation of this approach is intended to support consistent customer classification, the proportionate application of due diligence measures, and improved monitoring of business relationships across the entire Group, contributing to the strengthening of the capacity to identify, assess, and manage ML/TF risks.

ADDENDUM 1. Disclosure Requirements Covered by the Sustainability Statement

The table below presents the disclosure requirements from ESRS 2 and the material topic standards and indicates where information regarding each specific requirement can be found.

List of material disclosure requirements		Page number
BP-1	General basis for preparation of the sustainability statements	4
BP-2	Disclosures in relation to specific circumstances	6
GOV-1	The role of the administrative, management and supervisory bodies	11
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	22
GOV-3	Integration of sustainability- related performance in incentive schemes	24
GOV-4	Statement on sustainability due diligence	25
GOV-5	Risk management and internal controls over sustainability reporting	26
SBM-1	Market position, strategy, business model and value chain	28
SBM-2	Interests and views of stakeholders	56
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	60
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	279
E1	CLIMATE CHANGE	89
E1.GOV-3	Integration of sustainability-related performance in incentive schemes	24
E1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	62
E1.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
E1-1	Transition plan for climate change mitigation	The Group does not yet have a climate transition plan, but its development is underway, in line with the strategic direction adopted.
E1-2	Policies related to climate change mitigation and adaptation	109
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	89
E5	RESOURCE USE AND CIRCULAR ECONOMY	115
E5.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
E5-1	Policies related to resource use and circular economy	115
E5-2	Actions and resources related to resource use and circular economy	118

E5-3	Targets related to resource use and circular economy	118
S1	OWN WORKFORCE	
S1.SBM-2	Interests and views of stakeholders	56
S1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	62
S1-1	Policies related to own workforce	124
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	142
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	145
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	147
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	149
S1-6	Characteristics of the undertaking's employees	119
S1-9	Diversity metrics	119
S1-10	Adequate wages	127
S1-13	Training and skills development metrics	129
S1-14	Health and safety metrics	137
S1-16	Remuneration metrics (pay gap and total remuneration)	127
S1-17	Incidents, complaints and severe human rights impacts	134
S4	CONSUMERS AND END-USERS	151
S4.SBM-2	Interests and views of stakeholders	56
S4.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	62
S4-1	Policies related to consumers and end-users	154
S4-2	Processes for engaging with consumers and end-users about impacts	162
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	178
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	166
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	179
G1	BUSINESS CONDUCT	253
G1.GOV-1	The role of the administrative, supervisory and management bodies	11
G1.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
G1-1	Business conduct policies and corporate culture	253
G1-3	Prevention and detection of corruption and bribery	260
G1-4	Incidents of corruption or bribery	268
TS	SPECIFIC TOPICS	
TS1	Sustainable Finance	181
TS2	Entrepreneurship Education	219
TS3	General framework for preparing sustainability statements	238
TS4	Disclosures regarding specific circumstances	269

ADDENDUM 2. List of Indicators Deriving from other EU Legislation

The table below includes all ESRS indicators derived from other EU legislation and specifies where the information can be found, if it has been determined to be material.

Presentation requirement and related indicator	SFDR Reference	Reference Pillar 3	Benchmarks Regulation	Reference to European Climate Law	Material/ Not material	No. pag.
ESRS 2 GOV-1 Gender diversity of the board of directors, paragraph 21 (d)	Indicator 13 in Table 1 of Annex 1		EU Commission Delegated Regulation 2020/1816, Annex II		YES	11
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21(e)			Delegated Regulation (EU) 2020/1816, Annex II		YES	11
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator 10 in Table 3 of Annex 1				YES	25
ESRS 2 SBM-1 Involvement in fossil fuel-related activities, paragraph 40(d) i	Indicator 4 in Table 1 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on environmental and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II		NO	N/A
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40(d)(ii)	Indicator 9 in Table 2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		NO	N/A

ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40(d)(iii)	Indicator 14 in Table 1 of Annex 1	Delegated Regulation (EU) 2020/1818, Art. 12 (1) Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS 2 SBM-1 Involvement in activities related to the cultivation and production of tobacco, paragraph 40 (d) iv		Delegated Regulation (EU) 2020/1818, Art. 12 (1) Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS E1-1 Transition Plan for Achieving Climate Neutrality by 2050, paragraph 14		Regulament UE 2021/1119, Art. 2 (1)	YES	The Group does not yet have a climate transition plan, but its development is underway, in line with the strategic direction adopted.
ESRS E1-1 Entities excluded from Paris-aligned benchmarks, paragraph 16 (g)	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Model 1: Banking Book – Climate-related transition risk: Credit quality of exposures by sector, issuance, and residual maturity	Delegated Regulation (EU) 2020/1818, Art. 12.1(d) to (g) and Art. 12.2	NO	N/A

ESRS E1-4 Greenhouse gas (GHG) emission reduction targets, paragraph 34	Indicator 4 in Table 2 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Template 3: Banking Book – Climate-related transition risk: alignment indicators	Delegated Regulation (EU) 2020/1818, Art. 6	YES	The Group has not yet established GHG reduction targets.
ESRS E1-5 Energy consumption from fossil sources, broken down by source (only for sectors with high climate impact), paragraph 38	Indicator 5 in Table 1 and Indicator 5 in Table 2 of Annex 1			NO	N/A
ESRS E1-5 Energy consumption and energy mix, paragraph 37	Indicator 5 in Table 1 of Annex 1			NO	N/A
ESRS E1-5 Energy intensity associated with activities in sectors with high climate impact, paragraphs 40–43	Indicator 6 in Table 1 of Annex 1			NO	N/A
ESRS E1-6 Gross GHG emissions for Scopes 1, 2, and 3 and total greenhouse gas emissions, paragraph 44	Indicators 1 and 2 in Table 1 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Template 1: Banking Book – Climate-related transition risk: Credit quality of exposures by sector, emissions, and residual maturity	Delegated Regulation (EU) 2020/1818, Art. 5(1), 6, and 8(1)	YES	93

ESRS E1-6 Gross greenhouse gas emissions intensity, paragraphs 53–55	Indicator 3 in Table 1 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Template 3: Banking Book – Climate-related transition risk: alignment indicators	Delegated Regulation (EU) 2020/1818, Art. 8 (1)	YES	94
ESRS E1-7 Elimination of greenhouse gases (GHG) and carbon credits, paragraph 56			Regulament (UE) 2021/1119, Art. 2 (1)	NO	N/A
ESRS E1-9 Exposure of the reference portfolio to physical risks related to climate change, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS E1-9 Breakdown of monetary amounts by acute and chronic physical risk, paragraph 66(a)		Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47;		NO	N/A
ESRS E1-9 Location of significant assets exposed to material physical risk, paragraph 66 (c)		Template 5: Banking Book – Physical risk related to climate change: Exposures subject to physical risk			
ESRS E1-9 Breakdown of the carrying amount of its real estate assets by energy efficiency classes, paragraph 67(c)		Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking Book - Climate-related transition risk: Loans secured by real estate - Energy efficiency of the collateral		NO	N/A

ESRS E1-9 Degree of portfolio exposure to climate change opportunities, paragraph 69		Delegated Regulation (EU) 2020/1818, Annex II	NO	N/A
ESRS E2-4 The quantity of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) released into air, water, and soil, paragraph 28	Indicator 8 in Table 1 of Annex 1 Indicator 2 in Table 2 of Annex 1 Indicator 1 in Table 2 of Annex 1 Indicator 3 in Table 2 of Annex 1		NO	N/A
ESRS E3-1 Water and marine resources, paragraph 9	Indicator 7 in Table 2 of Annex 1		NO	N/A
ESRS E3-1 Dedicated policy, paragraph 13	Indicator 8 of Table 2 of Annex 1		NO	N/A
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator 12 of Table 2 of Annex 1		NO	N/A
ESRS E3-4 Total amount of water recycled and reused, paragraph 28 (c)	Indicator 6.2 in Table 2 of Annex 1		NO	N/A
ESRS E3-4 Total water consumption in m ³ relative to net revenue from own operations, paragraph 29	Indicator 6.1 of Table 2 of Annex 1		NO	N/A
ESRS 2-SBM 3 - E4 Paragraph 16 (a) i	Indicator 7 in Table 1 of Annex 1		NO	N/A
ESRS 2-SBM 3 - E4 Paragraph 16 (b)	Indicator 10 in Table 2 of Annex 1		NO	N/A

ESRS 2-SBM 3 - E4 Paragraph 16 (c)	Indicator 14 of Table 2 of Annex 1	NO	N/A
ESRS E4-2 Practices or policies for sustainable oceans/seas, paragraph 24 (c)	Indicator 11 of Table 2 of Annex 1	NO	N/A
ESRS E4-2 Practices or policies for sustainable oceans/seas, paragraph 24 (c)	Indicator 12 of Table 2 of Annex 1	NO	N/A
ESRS E4-2 Policies to combat deforestation, paragraph 24 (d)	Indicator 15 of Table 2 of Annex 1	NO	N/A
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator 13 of Table 2 of Annex 1	NO	N/A
ESRS E5-5 Hazardous and radioactive waste, paragraph 39	Indicator 9 in Table 1 of Annex 1	NO	N/A
ESRS 2-SBM3 - S1 Risk of forced labor incidents, paragraph 14 (f)	Indicator 13 of Table 3 of Annex 1	NO	N/A
ESRS 2-SBM3 - S1 Risk of child labor incidents, paragraph 14 (g)	Indicator 12 of Table 3 of Annex 1	NO	N/A
ESRS S1-1 Human Rights Policy Commitments, paragraph 20	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1	YES	125
ESRS S1-1 Due diligence policies regarding the issues addressed by the International Labor Organization's core conventions 1–8, paragraph 21	Delegated Regulation (EU) 2020/1816, Annex II	YES	125

ESRS S1-1 Processes and measures to prevent human trafficking, paragraph 22	Indicator 11 of Table 3 of Annex 1		NO	N/A
ESRS S1-1 Workplace Accident Prevention Policy or Management System, Paragraph 23	Indicator 1 in Table 3 of Annex 1		YES	137
ESRS S1-3 Mechanisms for resolving complaints, paragraph 32 (c)	Indicator 5 of Table 3 of Annex 1		YES	145
ESRS S1-14 Number of fatalities and number and rate of occupational accidents, paragraph 88 (b) and (c)	Indicator 2 in Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	138
ESRS S1-14 Number of days lost due to injuries, accidents, deaths, or illnesses, paragraph 88(e)	Indicator 3 in Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	138
ESRS S1-16 Gender pay gap, unadjusted, paragraph 97(a)	Indicator 12 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	128
ESRS S1-16 Annual remuneration rate of the CEO, paragraph 97(b)	Indicator 8 of Table 3 of Appendix 1		YES	128
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator 7 of Table 3 of Annex 1		YES	134
ESRS S1-17 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 104 (a)	Indicator 10 in Table 1 and Indicator 14 of Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	YES	134

ESRS 2-SBM3 – S2 Significant risk of child labor or forced labor in the value chain, paragraph 11(b)	Indicators 12 and 13 in Table 3 of Annex 1		NO	N/A
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		NO	N/A
ESRS S2-1 Policies related to workers in the value chain, paragraph 18	Indicators 11 and 4 in Table 3 of Annex 1		NO	N/A
ESRS S2-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Indicator 10 in Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	NO	N/A
ESRS S2-1 Due diligence policies regarding the issues addressed by the fundamental conventions of the International Labor Organization 1–8, paragraph 19		Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS S2-4 Human rights issues and incidents in the upstream and downstream value chain, paragraph 36	Indicator 14 in Table 3 of Annex 1		NO	N/A
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		NO	N/A

ESRS S3-1 Non-compliance with the UN Guiding Principles on Business and Human Rights, ILO principles, or OECD guidelines, paragraph 17	Indicator 10 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	NO	N/A
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator 14 of Table 3 of Annex 1		NO	N/A
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		YES	154
ESRS S4-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	Indicator 10 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	YES	158
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator 14 of Table 3 of Annex 1		YES	158
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator 15 of Table 3 of Annex 1		YES	254
ESRS G1-1 Protection of Whistleblowers, paragraph 10 (d)	Indicator 6 of Table 3 of Annex 1		YES	256
ESRS G1-4 Fines for violations of anti-corruption and anti-bribery legislation, paragraph 24 (a)	Indicator 17 of Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	268
ESRS G1-4 Standards on Anti-Corruption and Anti-Bribery Legislation, paragraph 24(b)	Indicator 16 of Table 3 of Annex 1		YES	260

ADDENDUM 3. Management Structures at the Subsidiary Level as of December 31, 2025

The subsidiaries of BT Group are managed under a unitary system, with each having a Board of Directors appointed by the General Meeting of Shareholders or Members, as applicable. For each subsidiary, executive powers have been delegated to one or more executive officers, scaled according to the scope of each company's operations and the specific characteristics of each company.

The company's supreme governing body is the General Meeting of Shareholders or Members, which determines its strategy based on key development directions, as recorded for each entity within the scope of consolidation.

Management structures are responsible for overseeing the business conduct of each subsidiary, ensuring the integration of ethical standards, compliance frameworks, and governance principles at all operational levels. Key responsibilities include establishing and updating ethical standards and policies, aligning them with the Group's Code of Conduct, anti-corruption policies, and fair competition policies, as well as overseeing compliance with regulations and industry practices in areas such as AML, anti-bribery, and data privacy.

Each entity operates under the supervision of the ASF, the NBR, or equivalent bodies in other countries, adapting the Group's standards to sector-specific regulations. Management monitors the effectiveness of internal controls and whistleblowing mechanisms, addressing misconduct. They are also responsible for integrating ESG factors into decision-making processes, extending the Sustainability Policy across the entire group.

Business conduct is overseen through a two-tiered system: the General Shareholders' Meeting who sets out the strategic direction, while the subsidiary's management, composed of experts with diverse qualifications, ensures its implementation. The Group proactively addresses challenges through its Policy on the Suitability Assessment of Management Board Members and Group-Level Evaluation.

At the level of each subsidiary of the Group, robust mechanisms for employee representation and social dialogue have been established. Each company has a collective bargaining agreement, negotiated with elected employee representatives for a two-year term. Employee representatives, elected every two years, play a crucial role in negotiating collective agreements, ensuring fair working conditions, fair wages, and workplace safety.

Starting in 2025, the Group's Sustainability Policy has been implemented at the subsidiary level, adapted to the specific context of each entity. The Boards of Directors of the subsidiaries monitor sustainability issues and oversee the companies' operations. Advisory

committees, such as those for audit, risk management, and compensation, formulate opinions on the identified impacts, risks, and opportunities.

To manage the complexity and novelty of these issues, the subsidiaries have developed training programs for staff and management and have engaged specialized experts to provide consulting on sustainability matters. Specific measures impacting sustainability are outlined in the sections dedicated to each company.

Remuneration of Subsidiary Staff and Management

The Group's primary objective regarding compensation is to uphold the principle of fairness, considering business and risk strategies, corporate culture and values, long-term institutional interests, and measures to mitigate conflicts of interest. The fundamental principles of the Remuneration Policy include driving long-term performance, attracting and retaining the best professionals, rewarding responsibility and professional track record, and generating profit under sustainable and competitive conditions.

The Group ensures fair and competitive compensation, based on skills and performance, with two components: fixed and variable. Fixed compensation reflects professional experience and organizational responsibility, while variable compensation reflects sustainable, risk-adjusted performance, subject to an annual review. The subsidiaries have their own remuneration policies, tailored to the business, risk appetite, and complexity of each company.

BT Microfinanțare IFN S.A. (BT Mic)

The management structure at BT Mic includes:

- The supervisory body – the Board of Directors, consisting of 3 non-executive members appointed by the General Meeting of Shareholders. The Board ensures the administration and supervision of the Institution, in accordance with the prerogatives set forth in the Articles of Incorporation and applicable legislation, and
- Senior executive management, consisting of 3 executive members – the CEO, who has coordination responsibilities regarding the overall operations, and the 2 Deputy CEOs, who are directly responsible for distinct areas of the company's operations, depending on their respective areas of expertise and the company's scope of business.

The managers of the Non-Bank Financial Institution (the CEO and the Deputy CEOs) must meet the specific requirements regarding qualifications, experience, and a good reputation by the legislation applicable to non-bank financial institutions. Their appointment is made by the Board of Directors, and they must undergo the procedures prescribed by the regulations of the National Bank of Romania.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Tiberiu Moisă	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Luminița-Delia Runcan	Member of the Board of Directors	Non-Executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies.
Cristina Sindile	Member	Non-Executive	Romanian	4 years	CEO with over 22 years of experience in the financial and banking sector, specializing in strategic management, risk management, and organizational process optimization. He has led complex microfinance projects and coordinated critical operational areas. He holds advanced degrees and has completed programs that reinforce his expertise.

Composition of the Board of Directors by gender and age

The Board of Directors of BT MIC	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	1	33.3	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	1	66.7	1	33.3	3	100

× × × ×

0.67 is the gender diversity rate at the Board of Directors level.

Top Management

The company's executive management (**Directors**) are appointed by the Board of Directors and must meet the legal requirements. Namely, they must be approved by the NBR before effectively assuming their duties. Pursuant to the relevant legal provisions, the Board of Directors has mandated the Directors of the non-bank financial institution jointly and

severally (and, with certain exceptions, individually) to exercise the powers of organizing and managing its operations.

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Valentina Alexandru	Deputy Director	Executive	Romanian	4 years	Loan specialist with over 20 years of experience in the financial sector. Possesses skills in coordinating and developing credit strategies and implementing financial strategies for microenterprises.
Marian Ene	CEO	Executive	Romanian	4 years	CEO of the Business Division with over 20 years of experience in the financial and banking sector. He possesses well-developed skills in business, marketing, and PR, as well as in coordinating the activities of the SME department.
Dan Cojocaru	Deputy Director	Executive	Romanian	4 years	Risk management specialist with over 19 years of experience in the financial sector, gained in banking institutions. His experience covers the definition and implementation of the risk management framework at the institutional level, the development of control and monitoring tools, and the coordination of compliance and corporate governance processes.

Executive management structure, by gender and age

BT MIC's executive management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	2	66.7	3	100
>50 years	0	0	0	0	0	0
Total	1	33.3	2	66.7	3	100

× × × ×

0.33 is the gender diversity rate at the executive management level.

Business conduct rules have been defined and implemented by management to reflect the institution's values, integrity, and compliance with legal requirements. BT Microfinance's ESG strategy integrates ESG principles into lending and corporate practices, promoting financial inclusion, entrepreneurship, and sustainability. ESG performance is monitored continuously, and the Institutional Development and Business Development Support Departments are responsible for implementing lending products and developing digital tools.

Company executives monitor impacts, risks, and opportunities, reporting quarterly to the Board of Directors. The General Shareholders' Meeting and the Board of Directors define the principles for conducting business in a prudent manner, ensuring an optimal internal

control system. Staff receive ongoing training, and one employee has been nominated for training in the ESG field.

OCN Microinvest SRL

The management structure at OCN Microinvest includes:

- Supervisory Body – the Company’s Board, composed of members appointed by the General Meeting of Shareholders. The Board establishes the strategy, approves primary Internal Rules of Procedure, monitors the activities of the executive body and internal divisions, and ensures the prudent management and oversight of the company’s risks, and
- Executive Management – the Administrator (General Director)*.

*In accordance with the Regulations on the Management Framework, the institution's executive body is referred to as the "Administrator (Executive Director)"

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Sabaz Mehmet Murat	Member of the Board of Directors	Non-executive	Turkish	1 year	Solid professional experience in the banking sector, gained in environments marked by rapid change and organizational transformation. He is results-oriented and collaborative, with expertise in customer relationship management, debt restructuring, risk management, and business process optimization. His work spans various segments, including retail, corporate, and SME, contributing to a deep understanding of the different dimensions of banking. Since 2024: Member of the Board of Directors of Victoriabank, serving on the Risk Management Committee and the Audit Committee; 2024–2025: Member of the Supervisory Board of BCR Chişinău; 2018–2024: Member of the Board of Directors of Victoriabank, Chair of the Compensation Committee, and member of the Risk Management Committee; Since November 2025: Member of the Board of OCN Microinvest SRL.
Luminița-Delia Runcan	Member of the Board of Directors	non-executive	Romanian	1 year	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit

					risk analysis, and internal control, playing a central role in defining and implementing risk strategies.
Khanikyan Levon	Member of the Board of Directors	non-executive	Armenian	1 year	With over 20 years of experience in financial and risk management. He specializes in building and coordinating diverse teams, with a solid academic background, including an MBA in international management and CFA certification. His work in Romania and Eastern Europe provides a practical perspective on retail and SME banking, treasury, and capital markets.
Sindile Cristina Dalia	Member of the Board of Directors	non-executive	Romanian	1 year	CEO with over 22 years of experience in the financial and banking sector, specializing in strategic management, risk management, and organizational process optimization. She has led complex microfinance projects and coordinated critical operational areas. She holds advanced degrees and has completed programs that reinforce her expertise.

Composition of the Board of Directors by gender and age

Board of Directors of OCN Microinvest	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	25	1	25	2	50
>50 years	1	25	1	25	2	50
Total	2	50	2	50	4	100

xxxx

0.50 is the gender diversity rate on the Board of Directors.

Top Management

The Executive Director is the sole executive body, responsible for managing day-to-day operations, implementing approved strategies, risk management, AML/CFT compliance, and representing the Company in its dealings with third parties. He reports periodically to the General Meeting of Shareholders and the Board and may delegate duties to subordinate units.

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Svinarenco Dumitru	CEO	Executive	Moldovan	1 year	Executive with over 22 years of experience in the banking and microfinance sector, specializing in MSME lending, risk management, and business development. He has led Microinvest since 2015, with responsibilities including strategy, coordination of the company's operations, implementation of risk policies, and relations with regulatory authorities and international financiers.

Executive management structure, by gender and age

Executive management of BT Microinvest	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	100	1	100
>50 years	0	0	0	0	0	0
Total	1	0	1	100	1	100

❖ ❖ ❖

0 is the gender diversity rate at the executive management level.

Microinvest has committees dedicated to critical areas such as credit risk, operational risk, financial risk, AML/CFT, fraud prevention, recovery, human resources, IT & projects, audit follow-up, and the ESG Committee. These committees support the decisions of the Board and the CEO, monitor risks, and approve corrective measures.

The ESG strategy is coordinated by the ESG Committee, which monitors the implementation of ESG standards, assesses social and environmental impacts, analyzes green loans, and approves measures to integrate ESG criteria into lending and risk management.

Internal control is structured around independent functions (risk, legal compliance, AML/CFT, operational risk, information security, and internal audit), and IT systems and business continuity plans ensure stable, compliant, and responsible operations in line with sustainability requirements.

BT Leasing Transilvania IFN S.A. (BT Leasing)

Given the completion of the merger by absorption with OTP Leasing România IFN S.A. on December 1, 2024, and the integration process being fully completed, the information presented for the year 2025 is reported exclusively from the perspective of the entity resulting from the merger.

BT Leasing Transilvania IFN S.A. is managed under a unitary system: the Board of Directors exercises supervisory functions, while day-to-day management is carried out by senior executive management, consisting of at least two individuals. Directors and members of management have a solid professional reputation and experience appropriate to the company's activities. The company complies with the prudential requirements of the National Bank of Romania and notifies it of relevant changes regarding management structures and governance, in accordance with applicable regulations.

The management structure at BT Leasing includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 5 executive members, one with overall coordination responsibilities for the company's entire operations, and 4 of whom directly oversee different areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the industry, products, and location of the company
Tiberiu Moisă	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Ioan Alin Nistor	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Daniel Szeleky	Independent Non-Executive Member	Non-Executive	Romanian	4 years	Executive Director of Corporate Business with over 24 years of experience in the financial and banking sector. Previously held the position of SME & Microbusiness Director, consolidating his expertise in coordinating commercial activities for clients classified as SMEs and Micro Businesses, as well as monitoring aspects related to their interaction with the financial institution. He holds a university degree and is a member of the Board of Directors at ROCA X, Ebriza Software SRL, BT Leasing, BT Mic, GapMinder VC, and BT Club, the Romanian Entrepreneurs' Club. He has also participated in numerous training courses through which he has strengthened his skills in leadership and commercial strategy, risk and portfolio management, corporate governance, and customer relationship management

Composition of the Board of Directors by gender and age

Board of Directors of BT Leasing	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	0	0	1	33.3	1	33.3
Total	0	0	3	100	3	100

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0 is the gender diversity rate at the Board of Directors level.

Top Management

The company's executive management (**Directors**) are appointed by the Board of Directors and must meet the legal requirements. Namely, they must be approved by the NBR before effectively assuming their duties. Pursuant to the relevant legal provisions, the Board of Directors has mandated the Directors of the non-bank financial institution jointly and severally (and, with certain exceptions, individually) to exercise the powers of organizing and managing its operations.

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Ionuț-Călin Morar	CEO	Executive	Romanian	4 years	Over 25 years of experience in the leasing industry. His professional career reflects a constant commitment to the company's strategic development, coordination of lending and risk management activities, implementation of operational policies, and representation of the company in its relations with institutional partners and third parties.
Mihai Nicolescu	Deputy Director	Executive	Romanian	4 years	Deputy CEO of Finance with over 20 years of experience in the financial sector. He is one of the four executives at BT Leasing Transilvania. He has expertise in coordinating and managing the finance, accounting, and reporting departments.
Liviu-Onuț Șerban	Deputy	Executive	Romanian	4 years	Deputy General Commercial Director with over 16 years of experience in lease financing. Possesses expertise in coordinating and auditing the activities of organizational structures, developing strategies and policies for the company's growth, and analyzing economic indicators. Academic background provides a solid foundation in financial regulations.
Corina Portase	Deputy Director	Executive	Romanian	4 years	Deputy CEO for Risk and Compliance with over 24 years of experience in the field of lease financing. He possesses expertise in representing the company, ensuring and implementing its strategy and development policy, overseeing risk

Pop Marian Rodion	Deputy Director	Executive	Romanian	4 years	management, and coordinating the activities of subordinate organizational units. Marian Rodion Pop has over 15 years of experience in finance and operations, with expertise in leasing, portfolio management, and the coordination of organizational processes. Since 2018, he has served as Chief Operations Officer at BT Leasing, responsible for planning and managing external funds, reporting to management and regulatory authorities, managing environmental risks, and digitizing operational processes.

Executive management structure by gender and age.

Executive Management of BT Leasing	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	20	4	80	5	100
>50 years	0	0	0	0	0	0
Total	1	20	4	80	5	100

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0.20 is the gender diversity rate at the executive management level.

The responsibilities for monitoring and controlling sustainability impacts, risks, and opportunities at BT Leasing are carried out by the Environmental Officer (Director of Operations) and the CEO. The company maintains a well-trained workforce, with professional development programs monitored monthly by the Board of Directors. The Board is informed monthly about impacts, risks, opportunities, and the effectiveness of the measures adopted. Risk analysis and information mapping are performed internally by the Risk Department.

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

The management structure at BT Pensii includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 2 executive members, one with coordination responsibilities for the company's overall operations, and the other directly overseeing various areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Members of the management body (executive and non-executive) are subject to a fitness assessment and prior approval by the Financial Supervisory Authority and may assume their duties only after the FSA has issued its approval decision. The entity conducts its own

suitability assessment in advance and submits the necessary documentation to the authority, in accordance with applicable regulations.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Aurel Bernat	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Executive Director of Financial Institutions and International Relations with over 20 years of experience in the financial and banking sector. She has expertise in investment management, investor relations, and international relations. She holds a university degree, supplemented by a Doctorate (PhD) in Management.
Anca-Eugenia Crăciun	Member of the Board of Directors	Non-Executive	Romanian	4 years	Coordinating Director of Private, Premium Banking, and Retail Products with over 26 years of experience in the financial and banking sector. She possesses expertise in establishing and expanding the Private Banking network, as well as its specific products, coordinating, maintaining, and developing business relationships with existing and potential clients, and promoting and selling the Bank's products.
Cosmin Antoine Constantin Călin	Independent Non-Executive Member	Non-Executive	Romanian	4 years	Executive Director of Large Corporate Clients with over 24 years of experience in the financial and banking sector. Expertise in developing the portfolio of relationships with large corporate clients, coordinating, maintaining, and developing business relationships with existing and potential clients, as well as coordinating and organizing numerous departments.

Composition of the Board of Directors by gender and age

Board of Directors of BT Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.30	0	0	1	33.30
Total	1	33.3	2	66.7	3	100

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0.33 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Dana Corina Benea	Deputy CEO	Executive	Romanian	4 years	Over 13 years of experience in private pension administration. She holds dual degrees in mechanical engineering and economics, which combine analytical thinking regarding financial processes and risk management.
Ionuț Florentin Stroe	Chief Executive Officer	Executive	Romanian	4 years	Over 15 years of experience in the banking sector and pension fund management. He has expertise in coordinating marketing and sales departments, as well as in promoting and selling banking products. Also holds a college degree that reinforces the skills acquired.

Executive management structure, by gender and age

Executive management of BT Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	50	1	50
>50 years	1	50	0	0	0	50
Total	1	50	1	50	2	100

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0.50 is the gender diversity rate at the executive management level.

The Board of Directors oversees sustainability impacts, risks, and opportunities, while effective management is carried out by the Directors. They may propose the establishment of committees to manage critical issues. Employee programs are diverse, tailored to the company's needs and the employees' potential.

The management structures, the Board of Directors and the Executive Directors, ensure an adequate internal control framework. The Internal Audit Department establishes and maintains an audit plan, assessing the effectiveness and adequacy of risk management, internal control, investments, and marketing. Internal control and risk management represent the second level of control, ensuring compliance with legal prudential obligations and the management of sustainability issues.

BT Asset Management S.A.I. SA (BTAM)

The management structure at BT Asset Management includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 3 executive members, one with coordination responsibilities for the company's overall operations, and 2 of whom directly oversee different areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Members of the management structure (executive and non-executive) are subject to a suitability assessment and prior approval by the Financial Supervisory Authority, and the exercise of their mandate is possible only after the FSA issues its approval decision. The entity conducts its own suitability assessment and submits the necessary documentation to the authority, in accordance with applicable regulations. Due to the complexity of the company's regulatory and operational framework, the Board of Directors is responsible for overseeing sustainability-related impacts, risks, and opportunities pertaining to BTAM.

Board of Directors

Member Name	Position	Member Type	Nationality	Length of the assignment	Relevance of experience to the industry, products, and company location
Luminița-Delia Runcan	Chair of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies.
Aurel Bernat	Member of the Board of Directors	Non-Executive	Romanian	4 years	Executive Director of Financial Institutions and International Relations with over 20 years of experience in the banking sector. Possesses solid expertise in investment management, investor relations, and international relations. Holds a higher education degree, complemented by a PhD in management.
Oana Ilaș	Member of the Board of Directors	Non-Executive	Romanian	4 years	Relevant experience as per CV, available here.

Composition of the Board of Directors, by gender and age

BTAM Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	1	33.3	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	2	66.7	1	33.3	3	100

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0.67 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Dan Dascăl	Chief Executive Officer	Executive	Romanian	4 years	Chief Executive Officer with over 25 years of experience in the capital markets. He joined the Banca Transilvania Group in 2002, overseeing asset analysis and management activities. He has expertise in portfolio management, financial analysis, and fund management.
Călin Condor	Deputy CEO	Executive	Romanian	4 years	Deputy CEO with over 29 years of experience within the Banca Transilvania Group and in the financial sector. He also holds two postgraduate degrees in Business Administration and Banking and Capital Markets.
Irimiea Victor Tudor	Deputy CEO	Executive	Romanian	4 years	Tudor Irimiea has over 15 years of experience in the capital markets, investments, and commercial management. Since 2022, he has been coordinating marketing and sales activities at BT Asset Management, with responsibilities in developing the commercial strategy and increasing market share.

Executive management structure, by gender and age

BTAM's executive management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	33.3	1	33.3
>50 years	0	0	2	66.7	2	66.7
Total	0	0	3	100	3	100

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0 is the gender diversity rate at the executive management level.

The Board of Directors sets the company's development directions, and the executive management implements the measures decided upon. BTAM's governance system ensures proper, efficient, and prudent management in accordance with legal regulations. The organizational structure is designed to best serve the interests of the investors in the managed funds.

Internal control lines include risk management and compliance, and control at the parent company level verifies adherence to Group standards. The availability of the skills necessary for sustainability oversight is valued at all hierarchical levels. Management structures promote diversity and ensure continuous professional development, adhering to principles of ethics and conduct.

The compensation policy is reviewed by the Compensation and Nomination Committee and approved by the Board of Directors. The General Shareholders' Meeting provides strategic leadership, setting organizational objectives and allocating the necessary resources. The principles of conduct include moral integrity, professionalism, transparency, compliance with the law, confidentiality, prevention of corruption, social responsibility, and avoidance of conflicts of interest.

BT Capital Partners S.A. (BTCP)

The management structure at BT Capital Partners includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 4 executive members, one with coordination responsibilities for the company's overall operations, and 3 of whom directly oversee different areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

The entire management of the entity, whether executive or non-executive, must be authorized by the ASF. Thus, regardless of the body appointing the members of the management team (the general meeting of shareholders or the board of directors), each of them must pass the suitability assessment conducted by the authority before assuming their mandate.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Costel Lionăchescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in the financial, banking, and investment sectors, with a solid track record in the management and administration of financial institutions. He has held top management positions, with expertise in corporate governance, strategy, financial restructuring, and investor relations. His work spans both the banking sector and the capital markets.
Ömer Tetik	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Leontin Toderici	Member of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here

Composition of the Board of Directors by gender and age

The Board of Directors of BTCP	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	0	0	0	0
>50 years	0	0	3	100	3	100
Total	0	0	3	100	3	100

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0 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Daniela Secară	CEO	Executive	Romanian	4 years	Relevant experience as per CV, available here.
Mihai Milchiș	Deputy CEO	Executive	Romanian	4 years	Deputy CEO for Finance, has over 19 years of experience in the capital market. She has been a tax consultant since 2007 and is a member of the Chamber of Tax

					Consultants, holding a bachelor's degree in economics from Babeș-Bolyai University, specializing in Business Management.
Mirela-Lenuța Buduroiu	Deputy CEO	Executive	Romanian	4 years	Deputy CEO for Risk, has 20 years of experience in the capital market, holding leadership and risk management positions at BTCP and SSIF Target Capital. She holds multiple certifications in financial risk and has a bachelor's degree in economics from the Bucharest Academy of Economic Studies (ASE), specializing in Economic Planning and Cybernetics.
Vlad Pintiile	Deputy CEO	Executive	Romanian	4 years	Deputy CEO of Trading, has over 14 years of experience in the capital market, having held management and financial analysis positions at BTCP and NBG Securities, and holds degrees from ASE, City University, and the Bucharest International School of Management.

Executive management structure, by gender and age

BTCP Executive Management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	25	2	50	3	75
>50 years	1	25	0	0	1	25
Total	2	50	2	50	4	100

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0.5 is the gender diversity rate at the executive management level.

The Board of Directors implements the company's strategy approved by the general meeting, and executive management implements the necessary measures. Oversight of sustainability impacts, risks, and opportunities is ensured by the Board of Directors and advisory committees. BTCP collaborates with the ESG Integration & IR Department to update the internal framework and appoints a sustainability officer who participates in ongoing training programs.

Compensation policies do not create incentives that favor self-interest at the expense of clients. BTCP develops sustainability policies and procedures, integrating sustainability risks and issues into day-to-day operations. Sustainability information is published on its website to inform investors.

BTCP analyzes the quality of ESG information from issuers to assess and monitor the environmental and social characteristics of investments. It periodically reassesses the situation and intends to consider the negative effects of investment decisions on sustainability factors. The findings of the risk assessment are integrated into new procedures and policies. Information is provided during executive management meetings whenever necessary.

BT Direct IFN S.A. (BT Direct)

The management structure at BT Direct includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 3 executive members.

Board of Directors

Member Name	Position	Member type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Gabriela Nistor	Chair of the Board of Directors	Non-executive	Romanian	4 years	Gabriela Nistor has nearly 30 years of experience in the banking sector, holding key roles in the development and digitalisation of Banca Transilvania, as well as in the transformation of Idea:Bank into Salt Bank, a project she led between 2022 and 2025. Her professional activity is distinguished by strategic leadership, the development of banking products, and the implementation of major digital modernisation initiatives.
Florentina Virginia Mircea	Member of the Board of Directors	Independent non-executive	Romanian	4 years	With over 21 years of experience in the financial sector, having held leadership positions such as Executive Director at TBI Bank EAD Sofia for 9 years and country-level executive roles at TBIF Financial Services for over 14 years, with expertise in banking management, strategic planning, and business development
Oana Ilaș	Member of the Board of Directors	Independent Non-Executive	Romanian	4 years	Relevant experience as per CV, available here.

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0.67% of the members of the Board of Directors are independent.

Composition of the Board of Directors by gender and age

The Board of Directors of BT Direct	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	0	0	1	33.3
>50 years	2	66.7	0	0	2	66.7
Total	3	100	0	0	3	100

xxxx

0 is the gender diversity rate at the Board of Directors level

Top Management

Members of the company's management with executive responsibilities (Directors), appointed by decision of the Board of Directors from among its directors, are subject to prior approval by the National Bank of Romania, for the purpose of confirming the competence and integrity necessary to exercise leadership and management responsibilities in the provision of payment services. This procedure supports BT Direct's commitment to sound principles of governance, transparency, and compliance, contributing to the maintenance of a secure, ethical, and regulatory-compliant operational framework.

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Nicoleta Bott	CEO	Executive	Romanian	4 years	With over 21 years of experience in the financial industry, progressing from operational and back-office roles to top management positions, she is currently CEO at BT Direct IFN SA, with expertise in operational, administrative, and strategic management.
Gabriel Gogu	Deputy CEO	Executive	Romanian	4 years	With over 29 years of experience in financial management and risk management, he has held strategic leadership positions in the banking and financial sector. Currently, Deputy CEO for Risk at BT Direct IFN SA, where she coordinates the company's risk management divisions. For 16 years, she served as CEO of BT Direct and CEO at RALFI S.A.
Iuliana Puhalschi	Deputy CEO	Executive	Romanian	4 years	Deputy CEO, Finance, with over 19 years of experience in the financial and economic

sector. Expertise in managing tax-related activities and ensuring timely reporting to the relevant authorities, maintaining contact with other financial institutions, coordinating internal and external audits and tax inspections, economic strategy, and process optimization. In her current position, she oversees the finance, reporting, and data management departments. She holds a bachelor's degree in economics, supplemented by a master's degree and an Executive MBA. She is also a member of ACCA and CECCAR.

Executive management structure, by gender and age

BT Direct's executive management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	2	66.7	0	0	2	66.7
>50 years	0	0	1	33.3	1	33.3
Total	2	66.7	1	33.3	3	100

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0.67 is the gender diversity rate at the executive management level

BT Direct's customer portfolio focuses on individuals, including personal loans and card products, in line with the company's business scope and operational structure . At the organizational level, BTD has a dedicated sustainability role, the ESG Governance and Risk Specialist, who works within the Risk Control and Management Division, reporting to the Deputy CEO for Risk, with responsibilities for analyzing/monitoring risks and coordinating internal/external/BT Group reporting in the ESG area.

The Board of Directors sets the objectives/strategy, approves the risk management framework, and exercises oversight over executive management, with the ability to delegate responsibilities within legal limits. The Risk Management Committee advises the Board of Directors on strategy and risk appetite, oversees implementation, develops procedures, and reports to the Board at least quarterly. Its scope also includes sustainability risks.

Internal audit is conducted internally or through the parent company's specialized department, in accordance with applicable regulations.

Currently, sustainability risks are considered insignificant, given the nature of the business (loans to individuals in Romania) and the operational profile. BTD monitors climate risks

(physical/transition) and aligns with the Group's policies. BTD contributes to the Group's consolidated reporting (including carbon footprint, Scope 1/2/3).

Improvement Credit Collection S.R.L. (ICC)

Board of Directors

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Bogdan Pleşuvescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here .
Luminița-Delia Runcan	Member of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies
George Călinescu	Member of the Board of Directors	Non-Executive	Romanian	4 years	Relevant experience as per CV, available here

Composition of the Board of Directors, by gender and age

ICC Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	1	33.3	2	66.7	3	100

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0.33 is the gender diversity rate on the Board of Directors

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Paul Țupa	Chief Executive Officer	Executive	Romanian	4 years	27 years of experience in the financial and banking sector.

Ștefan-Dan Dragomir	Deputy CEO	Executive	Romanian	4 years	24 years of experience in the financial and banking sector.

Executive management structure, by gender and age

ICC Executive Management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	50	1	50
>50 years	0	0	1	50	1	50
Total	0	0	2	100	2	100

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0 is the gender diversity rate at the executive management level.

The Board of Directors oversees and manages the company's operations, while day-to-day management is delegated to the Chief Executive Officer and the Deputy Chief Executive Officer. The Board of Directors meets at least once a month, and executive management ensures the reporting and communication framework necessary for the implementation of approved strategies and policies. The main aspects of the company's risk management and internal control framework are represented by the three-line control system, operational risk management, the compliance and internal audit functions, and anti-fraud and information security activities, supplemented by the internal audit function organized at the BT Group level. The assessment and monitoring of these risks and related controls are carried out at all organizational levels, in accordance with the internal procedural framework.

ICC applies a compensation policy aligned with the business strategy and prudent risk management, without encouraging excessive risk-taking. The principles include long-term performance, attraction and retention, accountability, professional track record, profitability, transparency, and customer interests. Variable remuneration is granted based on individual and collective performance, taking into account the risks assumed and the company's results. Independent control functions receive predominantly fixed remuneration. The roles and responsibilities of the Board of Directors and the Chief Executive Officer include approving, monitoring, and verifying the sustainability of the variable remuneration package from a prudential perspective.

With regard to business conduct, the provisions of the Code of Ethics and Conduct applicable at the BT Group level are applicable within ICC. Additionally, the Procedure on Know Your Customer, the Prevention and Combating of Money Laundering and Terrorist Financing, as well as the Fraud Risk Management Policy, apply. ICC employees participate in regular training sessions organized by the BT Academy.

BT Leasing Moldova S.R.L. (BT Leasing MD)

The management structure at BT Leasing Moldova includes:

- The governing body with supervisory functions is the General Meeting of Shareholders, which manages the company through the Board of Directors, consisting of 4 non-executive members;
- Senior executive management is provided by the administrator, the General Director, who serves as the sole executive body and coordinates the company's entire operations.

Board of Directors

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Bogdan Pleşuvescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Ionuț-Călin Morar	Member of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in the leasing sector Her professional career reflects a consistent commitment to the company's strategic development, the coordination of credit and risk management activities, the implementation of operational policies, and the representation of the company in its relations with institutional partners and third parties.

Composition of the Board of Directors by gender and age

Board of Directors of BT Leasing MD	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	0	100	2	100
>50 years	0	0	0	0	0	0
Total	0	0	0	100	2	100

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0 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the industry, products, and company location
Marius-Călin Crăciunaș	Chief Executive Officer	Executive	Romanian	indefinite	More than 20 years of experience in the financial and banking sector.

Given that executive responsibilities are assigned to a single person, the diversity indicators applicable to the management body are not relevant to the current governance structure.

The management structure of O.C.N. BT Leasing MD S.R.L. provides a solid framework for administration and supervision, which supports the institution's vision of operating in a prudent, responsible, and efficient manner. Through the clear distribution of decision-making roles and robust internal control mechanisms, management ensures the necessary conditions for the integration of sustainable governance and for conducting business in accordance with the principles of transparency, compliance, and long-term development.

BT Broker de Asigurări S.R.L. (BT Broker)

The management structure at BT Broker de Asigurări SRL includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, exercised by the CEO (authorized by the ASF) and the Deputy CEO, as well as by division and department heads, within the limits of their delegated authority.

At the same time, the management structure is responsible for identifying, assessing, and managing the significant risks associated with the company's operations, ensuring a robust internal control framework that complies with ASF requirements, so that strategic and operational decisions are made in a prudent and well-founded manner.

Board of Directors

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Bogdan Pleșuvescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	<u>Relevant experience as per CV, available here.</u>
Luminița-Delia Runcan	Member of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in

					defining and implementing risk strategies.
Ionuț-Călin Morar	Member of the Board of Directors	Non-Executive	Romanian	4 years	Over 25 years of experience in the leasing sector. Her professional career reflects a consistent commitment to the company's strategic development, coordination of lending and risk management activities, implementation of operational policies, and representation of the company in relations with institutional partners and third parties.

Board of Directors Structure, by Gender and Age

Executive Management of BT Broker de Asigurare	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	1	33.3	2	66.7	3	100

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0.33 is the gender diversity rate at the Board of Directors level

Top Management

Name	Position	Member type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Coroiu Valentin	CEO	Executive	Romanian	4 years	Over 20 years of experience in the insurance industry, holding leadership roles throughout his career. He has coordinated sales, underwriting, claims, operations, risk, compliance, and internal control activities, with extensive expertise in strategic and operational management.
Laura Cheșa	Deputy CEO	Executive	Romanian	4 years	Over 25 years of experience in the insurance sector. Skilled in negotiating employment contracts, developing the insurance portfolio, as well as in cooperating with insurance companies and preparing reports for auditors and shareholders.

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0.50 is the gender diversity rate at the executive management level.

Salt Bank

The management structure at Salt Bank includes:

- The Board of Directors, which sets Salt Bank's strategic direction and oversees the implementation of policies, including those related to sustainability. The Board ensures that the bank operates within a robust governance framework, with transparent and e e processes, effective internal controls, and responsible risk management, including ESG risks.
- The Executive Management Committee, the bank's executive body, consists of the CEO and Deputy CEOs.

Board of Directors

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Ivo Gueorguiev	Chairman of the Board of Directors	Independent non-executive	Bulgarian, British	4 years	<u>Relevant</u> experience as per CV, available here
Costel Lionachescu	Member of the Board of Directors	Independent non-executive	Romanian	4 years	Over 25 years of experience in the financial, banking, and investment sectors, with a solid track record in the management and administration of financial institutions. He has held top management roles, with expertise in corporate governance, strategy, financial restructuring, and investor relations. His work spans both the banking sector and the capital markets.
Ömer Tetik	Member of the Board of Directors	Non-executive	Romanian	4 years	<u>Relevant</u> experience as per CV, available here
Gabriela Nistor	Member of the Board of Directors	Non-Executive	Romanian	4 years	Gabriela Nistor has nearly 30 years of experience in the banking sector, holding key roles in the development and digitalisation of Banca Transilvania, as well as in the transformation of Idea::Bank into Salt Bank, a project she led between 2022 and 2025. Her professional activity is distinguished by strategic leadership, the development of banking products, and the implementation of major digital modernisation initiatives.

Luminița-Delia Runcan	Member of the Board of Directors	Non-Executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies

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40% of the members of the Board of Directors are independent.

Composition of the Board of Directors by gender and age

Salt Bank Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
30–50 years	0	0	0	0	0	<u>0</u>
>50 years	2	40	3	60	5	100
Total	<u>2</u>	40	<u>3</u>	60	<u>5</u>	100

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0.4 is the gender diversity rate at the Board of Directors level.

The Steering Committee, the bank's executive body, organizes and coordinates day-to-day operations, implementing the strategy approved by the Board of Directors. The Steering Committee integrates ESG principles into operational processes, risk management, organizational culture, and the development of products and services.

Steering Committee

Name	Position	Member Type	Nationality	Term	Relevance of experience to the company's industry, products, and location
Gabriela Nistor	CEO	Executive	Romanian	3 years	Gabriela Nistor has nearly 30 years of experience in the banking sector, holding key roles in the development and digitalisation of Banca Transilvania, as well as in the transformation of Idea::Bank into Salt Bank, a project she led between 2022 and 2025. Her professional activity is distinguished by strategic leadership, the development of banking products, and the implementation of major digital modernisation initiatives.
Sorin Dumitrescu	Deputy CEO	Executive	Romanian	4 years	Sorin Dumitrescu has over 20 years of experience in the banking sector,

					specializing in risk management, internal control, and the coordination of operational structures. He has held leadership positions at institutions such as Credit Europe Bank and Techventures Bank, directly managing areas such as risk management, compliance, anti-fraud, lending, and legal affairs.
Sinan Kircali	Deputy CEO	Executive	Turkish	4 years	Sinan Kircali has over 30 years of experience in the banking sector, having held leadership roles in operations, risk, IT, and support functions. He has held executive positions in Romania, Turkey, Bulgaria, and Malta, where he was responsible for coordinating operational activities, implementing business and IT strategies, and managing post-merger processes.
Robert Anghel	Deputy CEO	Executive	Romanian	4 years	Robert Mihai Anghel has over 20 years of industry experience, with solid expertise in strategy, digitalization, and banking product development. He has led major digital transformation projects internationally. His experience spans business strategy, digital channel development, and business process optimization.
Vikram Tikoo	Deputy CEO	Executive	British	4 years	Over 20 years of international experience in technology, digital transformation, and the management of global payment platforms. He has held senior management roles at corporations such as Fiserv and American Express. He has led technology modernization strategies, product development, and compliance programs across more than 20 international markets.

Board of Directors composition by gender and age

Board of Directors of	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
30–50 years	0	0	3	60	3	60
>50 years	1	20	1	20	2	40
Total	1	20	4	80	5	100

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0.20 is the gender diversity rate at the Board of Directors level.

Through its organizational structure, Salt Bank consistently integrates ESG principles into all critical management functions. The independent control functions, Risk Management, Compliance, and Internal Audit, play an essential role in the Governance component, ensuring a robust framework for oversight, assessment, and reporting. These structures monitor relevant risks (compliance, reputational, legal, conduct, ESG, and ICT - IT & Communications), assess the effectiveness of internal processes, and ensure compliance with European and national regulations.

Together, the oversight exercised by the Board of Directors, the coordination of the Steering Committee, and the work of independent and specialized functions create a modern, ethical, and sustainability-oriented governance ecosystem that promotes transparency, accountability, and alignment with European best practices in the ESG field.

Victoriabank

Governance Structures at Victoriabank

At Victoriabank, the General Meeting of Shareholders (GMS) is the Bank’s supreme authority. Resolutions adopted by the GMS are binding on all shareholders and the Bank’s management bodies.

The organization, operation, and powers of the GMS are established by the Law on Joint-Stock Companies, the Bank’s Articles of Association, and the Regulations of the General Meeting of Shareholders.

The Bank’s management bodies are: the Board of Directors (BoD) and the Executive Committee (EC).

The Board of Directors (BoD) is the governing body responsible for overseeing and monitoring the decision-making process and is accountable for the Bank’s overall operations and financial soundness. The BoD oversees the activities of the executive body, monitoring its actions to ensure they align with the Bank’s strategy and policies.

Members of the Board of Directors

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Thomas Grasse	Chairman of the Board of Directors	Non-executive, independent	German	4 years	Relevant experience as per CV, available here
Mehmet Murat Sabaz	Member of the Board of Directors	Non-executive, independent	Turkish	4 years	Solid professional experience in the banking sector, gained in environments marked by rapid change and organizational transformation. He is results-oriented and collaborative, with expertise in customer relationship management, debt restructuring, risk management, and business process

optimization. His work spans various segments, including retail, corporate, and SME, contributing to a strong understanding of the different dimensions of banking.

Since 2024: Member of the Board of Directors of Victoriabank, serving on the Risk Management Committee and the Audit Committee;

2024–2025: Member of the Supervisory Board of BCR Chişinău;

2018–2024: Member of the Board of Directors of Victoriabank, Chair of the Compensation Committee, and member of the Risk Management Committee;

Since November 2025: Member of the Board of OCN Microinvest SRL.

Tiberiu Moisă	Member of the Board of Directors	Non-Executive,	Romanian	4 years	Relevant experience, as per CV available here
Peter Franklin Morris	Member of the Board of Directors	Non-executive, independent	British	4 years	Peter Franklin has over 40 years of experience in the financial services industry, with solid expertise in corporate and retail banking. Throughout his career, he has held key positions in corporate treasury, finance, and client relationship management at renowned institutions such as HSBC, Chase Manhattan, ANZ, and General Electric. He has also served on supervisory boards and executive committees, contributing to the strategic development of the organizations in which he has been involved.
Ludmila Costin	Member of the Board of Directors	Non-Executive, Independent	Moldovan	4 years	Ludmila Costin is a professional with over 24 years of experience in the insurance and consulting sectors, possessing solid expertise in the business environments of Moldova and Romania. Her career includes leadership roles at companies such as PwC and Grant Thornton, as well as work as an independent consultant. She specializes in compliance with financial crime regulations, internal control, and risk management.
Turcan Victor	Member of the Board of Directors	Non-Executive	Moldovan	4 years	Founder of BC "Victoriabank" S.A., the first commercial bank in the Republic of Moldova. Over the years, he has held several leadership positions within the institution, actively contributing to its development and consolidation. Following Victoriabank's integration into the BT Financial Group in 2018, he was re-elected as Chairman of the Board of Directors, a position he held until January 2024. August 2024: Member and Vice-Chairman of the Board of Directors (approved by the

					NBM in March 2025), Chairman of the Nomination and Governance Committee; 1993 – January 2024: Various positions within the Bank's senior management, including a long tenure as Chairman of the Board of Directors.
Russell Henry Emanuel	Member of the Board of Directors	Non-Executive	British	4 years	Extensive experience in the investment field, with a career focused on Eastern Europe and Asia. His work focuses on project financing, lending, and equity investments in the private and public sectors. He has held senior positions at leading international financial institutions. Since August 2024: Elected member of the Board of Directors of Victoriabank, subject to approval by the National Bank of Moldova; member of the Risk Management Committee and the Nomination Committee; 2021–2025: Chair of the Investment Committee and the Foreign Exchange Committee at the European Fund for Southeast Europe; 2021–present: Member of the Supervisory Board at Union Bank, Albania; 2010–2021: Director for the Western Balkans, Belarus, Moldova, and Ukraine at the EBRD.

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57% of the members of the Board of Directors are independent.

Composition of the Board of Directors by gender and age

Victoriabank Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	14.3	1	14.3
>50 years	0	0	6	85.7	6	85.7
Total	0	0	7	100	7	100

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0% is the gender diversity rate on the Board of Directors.

The Steering Committee is the Bank's executive body, which organizes, directs, and is responsible for day-to-day operations, manages the Bank's activities efficiently and prudently in accordance with the strategy and governance framework approved by the Board of Directors, and exercises its powers under the Board's supervision.

Members of the Steering Committee

Name	Position	Type of Member	Nationality	Term	Relevance of experience to the industry, products, and company location
Levon Khanikyan	President	Executive	Armenian	4 years	With over 20 years of experience in financial and risk management. He specializes in building and leading diverse teams, backed by a strong academic background, including an MBA in International Management and CFA certification. His work in Romania and Eastern Europe provides a practical perspective on retail and SME banking, treasury, and capital markets. He has led complex projects in the retail, SME, corporate, and capital markets sectors, contributing to the operational and digital transformation of the institutions with which he has collaborated. He joined Victoriabank in 2023, playing a key role in the bank's strategic development.
Donica Vasile	Vice President	Executive	Moldovan	4 years	An executive director with extensive experience. During her tenure as an executive director at Victoriabank, she oversaw key business lines, including retail, SMEs, and corporate banking. Under her leadership, the bank saw growth in loans, deposits, and market share.
Elena-Ionela Maloş	Vice President	Executive	Romanian	4 years	With experience in planning and coordinating banking operations, specializing in cash management, foreign currency payments, and loan processing, ensuring compliance with Internal Rules of Procedure and financial legislation. She is actively involved in the Bank's digital transformation, contributing to projects such as Digital Onboarding, the MIA service, and the mobile app update. Since 2021, she has been coordinating the Bank's operations, making a significant contribution to the digitalization of processes.
Vitalie Corniciuc	Executive Vice President	Executive	Moldovan	4 years	With expertise in auditing, IFRS 9, and international auditing standards. At the Bank, he oversees accounting, financial reporting, budgeting, and financial analysis activities. Her achievements

					include the development and implementation of a project to restructure the financial and accounting departments at CB Victoriabank SA, aligning these functions with the Banca Transilvania model.
Mircea Aursulesei	Executive Vice President	Executive	Romanian	4 years	Since the beginning of his career at the bank, Mircea Aursulesei has managed the branch network, which includes 25 branches and 42 agencies. He has experience in developing banking products for retail and SME clients, contributing to the improvement of operations in these business segments. He has experience in developing the service network and banking products, both in Romania and in the Republic of Moldova.
Popa Bogdan-Dumitru	Vice President	Executive	Romanian	4 years	Mr. Bogdan Popa has substantial experience in risk management, demonstrated through his work in implementing and overseeing complex frameworks such as Basel III, IFRS 9, and operational risk assessment.

Composition of the Board of Directors by gender and age

Victoriabank's Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	16.7	5	83.3	6	100
>50 years	0	0	0	0	0	0
Total	1	16.7	5	83.3	6	100

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16.7% is the gender diversity rate on the Board of Directors.

The Bank integrates sustainability principles into its operations through an ESG Coordinator, who is responsible for coordinating environmental, social, and governance initiatives across the entire organization. This person monitors the implementation of ESG reporting requirements, supports the integration of sustainability criteria into operational and risk management processes, and ensures collaboration with relevant internal structures to align with regulatory standards and best practices in the field. ESG risk analysis is also included in the lending process for corporate clients, with a dedicated opinion issued to assess the potential impact on the bank and on transactions.

At the same time, operational sustainability is reinforced through the Bank's control and continuity mechanisms, such as the Business Continuity Committee, which manages the Business Continuity Management System, and the Crisis Management Committee, responsible for activating the recovery plan and coordinating necessary measures in unforeseen situations. These structures contribute to maintaining operational resilience and the Bank's ability to respond effectively to risks and disruptive events.

INNO Investments

The management structure at INNO Investments SAI SA includes:

- the supervisory body, the Supervisory Board, consisting of 3 independent non-executive members, and
- senior executive management, consisting of 3 executive members, one with coordination responsibilities for the entire business, and 2 of these having direct oversight of various areas of the company's operations, depending on their respective competencies and the company's scope of business.

Members of the management structure (executive and non-executive) are subject to a suitability assessment and prior approval by the Financial Supervisory Authority, and the exercise of their mandate is possible only after the FSA issues its approval decision.

Members of the Supervisory Board

Name	Position	Member Type	Nationality	Term Office	of Relevance of experience to the company's industry, products, and location
Cătălin Ioan Caragea	Chairman	Non-executive	Romanian	4 years	Relevant experience as per CV, available here .
Diana Ioana Mazurchievici	Member	Non-executive	Romanian	4 years	Over 15 years of solid experience in the financial sector, with expertise in ESG, sustainability reporting, investor relations, and mergers and acquisitions. Held leadership roles at Banca Transilvania and previously in financial auditing, overseeing non-financial reporting, complex due diligence processes, and interactions with institutional investors and regulatory authorities.
Corina Elena Stoica	Member	Non-executive	Romanian	4 years	Over 20 years of experience in the financial-banking sector and the capital market, with solid expertise in private banking, fund management, private pensions, treasury, and investments. Her expertise covers both strategic and operational areas, as well as product development, customer relationship management, and market analysis.

Supervisory Board	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.33%	1	33.33%	2	66.67%
>50 years	1	33.33%	0	00	1	33.33%
Total	2	66.67%	1	33.33%	3	100%

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66.67% is the gender diversity rate at the Supervisory Board level

Members of Senior Management

Name	Position	Member Type	Nationality	Term	Relevance of experience to the industry, products, and company location
Vlad Teodor Micu	CEO & President	Executive	Romanian	4 years	Over 25 years of experience in the banking sector, with a focus on corporate banking, investment banking, and distressed credit management. He has held executive leadership positions at major banking institutions, coordinating financing, reorganization, and remediation strategies for corporate clients.
Adrian Anghel	Deputy CEO	Executive	Romanian	4 years	With over 18 years of experience in asset management, Adrian has solid expertise in fund sales. His professional career includes approximately 18 years spent in various key positions in capital markets and investor relations, as well as in diversifying distribution channels and developing the product range, including their market positioning. He is a graduate of the Faculty of Finance, Insurance, Banking, and Stock Exchanges at the Bucharest Academy of Economic Studies.
Dragoş Gabriel Manolescu	Deputy CEO	Executive	Romanian	4 years	Executive with in-depth knowledge acquired through specialized programs in the financial field, including CFA certification and a master's degree in international project management from the Bucharest Academy of Economic Studies. Has approximately 18 years of professional experience in the capital markets sector, gained at several investment management firms and banking institutions, with expertise focused on fixed-income and listed equity portfolios.

Senior Executive Management Structure, by Gender and Age

Executive Committee	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.67%	2	66.67%
>50 years	0	0	1	33.33%	1	33.33%
Total	0	0	3	100%	3	100.00%

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0% is the gender diversity rate at the Senior Executive Management level.

BRD S.A.F.P.P. SA (BRD Pensii)

BRD Societate de Administrare a Fondurilor de Pensii Private S.A. was acquired by Banca Transilvania and BT Investments S.R.L. on November 28, 2025

The management structure at BRD Pensii includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- the executive management, consisting of two executive members, one with coordination responsibilities for the company's overall operations, and the other directly overseeing various areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Members of the management structure (executive and non-executive) are subject to a suitability assessment and prior approval by the Financial Supervisory Authority, and the exercise of their mandate is possible only after the FSA issues its approval decision. The entity conducts its own suitability assessment in advance and submits the necessary documentation to the authority, in accordance with applicable regulations.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Anca Eugenia Crăciun	Chair of the Board of Directors	Non-executive	Romanian	4 years	Managing Director of Private, Premium Banking, and Retail Products, with over 26 years of experience in the financial and banking sector. He has expertise in establishing and expanding the Private Banking network and its specific products,

					coordinating, maintaining, and developing business relationships with existing and potential clients, as well as promoting and selling the Bank's products.
Bogdan-Lucian Duma	Member of the Board of Directors	non-executive	Romanian	4 years	Deputy Director of Corporate Governance and Legal Affairs for Subsidiaries, with over 15 years of experience in the financial, banking, and investment sectors. He possesses solid expertise in coordinating corporate governance at the group level, ensuring the legal framework for subsidiaries, and managing relations with regulatory authorities.
Mihai Stelian Rotaru	Member of the Board of Directors	Non-Executive	Romanian	4 years	Head of the Legal Department, with over 18 years of experience in the financial and banking legal field, both in credit institutions and in complex transformation and M&A projects. She possesses solid expertise in coordinating corporate, retail, and litigation legal structures, as well as in managing strategic projects at the group level, and is actively involved in the development of the legal profession.

Composition of the Board of Directors by gender and age

BRD Pensii Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	0	0
Total	1	33.3	2	66.7	3	100

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0.33 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Corina Mădălina Cojocaru	CEO	Executive	Romanian	4 years	Over 18 years of experience in investment management and private pension funds. She possesses solid expertise in strategic organizational leadership, implementing governance and compliance frameworks, and managing relationships with regulatory authorities, leading complex transformation, digitalization, and risk management processes.
Mihail-Dan Nicu	Executive Director	Executive	Romanian	4 years	Over 30 years of experience in investment management, pension funds, and the capital market. He has held top management positions

at SAI BRD Asset Management, including CEO and Chairman of the Board of Directors, overseeing investment, risk, accounting, and treasury activities.

Executive management structure, by gender and age

Executive management of BRD Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	50	0	0	1	50
>50 years	0	0	1	50	1	50
Total	1	50	1	50	2	100

xxxx

0.5 is the gender diversity rate at the executive management level.

The Board of Directors provides strategic leadership for the Company, continuously assessing the impacts, risks, and opportunities associated with its operations. It establishes development directions, major policies, and the governance framework, ensuring the proper implementation of strategies, internal control systems, and risk and compliance policies. Operational management is carried out by executive management, which may propose the establishment of committees dedicated to critical issues, contributing to efficient and prudent administration. Together, the management structures ensure robust oversight, a transparent decision-making framework, and a risk management system aligned with legal requirements and the Company's long-term objectives.

ADDENDUM 4. KPIs Disclosed under Article 8 Taxonomy Regulation

Template 1:

Assets for the calculation of GAR (Turnover)

Disclosure reference date/period 31.12.2025

Stock/Flow (Million EUR)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7(9)	Of which not assessed consid- ered nonmaterial by the credit institution (2)
				Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO							
1	GAR – Covered assets in both numerator and denominator															
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	50,075.61	6,001.53	4,543.56	4,543.50	0.06	-	-	-	4,147.52	-	-	14,557.11	-	-	1,943.92
3	Financial undertakings	10,099.75	266.37	26.53	26.47	0.06	-	-	-	-	-	-	9,858.14	-	-	15.94
4	Loans and advances	7,572.97	250.23	18.46	18.44	0.02	-	-	-	-	-	-	7,554.51	-	-	15.05
5	Debt securities, including UoP	2,311.70	16.14	8.07	8.03	0.04	-	-	-	-	-	-	2,303.63	-	-	0.89
6	Equity instruments	215.08	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Non-financial undertakings	9,847.98	2,823.93	1,767.26	1,755.95	-	-	-	-	1,386.44	-	-	4,698.96	-	-	1,927.99
8	Loans and advances	9,769.34	2,773.59	1,767.26	1,755.95	-	-	-	-	1,386.44	-	-	4,698.96	-	-	1,927.99
9	Debt securities, including UoP	78.64	50.33	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Households	27,819.94	2,911.24	2,761.08	2,761.08	-	-	-	-	2,761.08	-	-	-	-	-	-
12	of which loans collateralised by residential immovable property	27,449.37	2,911.24	2,761.08	2,761.08	-	-	-	-	2,761.08	-	-	-	-	-	-
13	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	of which motor vehicle loans	370.57	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Local governments financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Other local government financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	45.64	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Exposures included on a voluntary basis (3)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Total GAR assets	50,121.24	6,001.53	4,543.56	4,543.56	0.06	-	-	-	4,147.52	-	-	14,557.11	-	-	1,943.92
21	Assets not covered for GAR calculation	175,225.01														
22	Central governments and Supranational issuers	77,889.55														
23	Central banks exposure	19,637.43														
24	Trading book	3,530.91														
25	Undertakings and entities not subject to CSRD	62,294.07														
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	59,278.71														
27	Loans and advances	58,755.92														
28	of which loans collateralised by commercial immovable property	15,818.04														
29	of which building renovation loans															

Stock/Flow (Million EUR)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling				
				Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO				Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7(9)	Of which not assessed consid- ered nonmaterial by the credit institution (2)
30 Debt securities	475.00															
31 Equity instruments	47.78															
32 Non-EU country counterparties not subject to CSRD disclosure obligations	3,015.36															
33 Loans and advances	2,508.03															
34 Debt securities	506.69															
35 Equity instruments	0.64															
36 Derivatives	145.82															
37 On demand interbank loans	2,042.68															
38 Cash and cash-related assets	5,548.23															
39 Other categories of assets (e.g. Goodwill, commodities etc.)	4,136.32															
40 Total assets	225,346.25	6,001.53	4,543.56	4,543.50	0,06	-	-	-	-	4,147.52	-	-	14,557.11	-	-	1,943.92
Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments																
41 Financial guarantees	1,225.38	20.89	20.01	20.01	-	-	-	-	-	-	-	-	1,205.37	-	-	-
42 Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43 of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44 of which equity instrument	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.
- Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Assets for the calculation of GAR (CapEx)

Disclosure reference date/period 31.12.2025

Stock/Flow (Million EUR)		a	b	c	d	e	f	g	h	i	j	k	l	m		n	o	p
		Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7 (9)	Of which not assessed consid- ered nonmaterial by the credit institution (2)	
					Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO								
1	GAR – Covered assets in both numerator and denominator																	
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	50,075.61	7,179.44	4,622.04	4,621.88	0.16	-	-	-	-	4,147.52	-	-	14,478.62	-	-	-	1,943.92
3	Financial undertakings	10,099.75	281.44	34.81	34.65	0.16	-	-	-	-	-	-	-	9,849.86	-	-	-	15.94
4	Loans and advances	7,572.97	257.18	22.68	22.61	0.07	-	-	-	-	-	-	-	7,550.29	-	-	-	15.05
5	Debt securities, including UoP	2,311.70	24.26	12.13	12.04	0.09	-	-	-	-	-	-	-	2,299.57	-	-	-	0.89
6	Equity instruments	215.08	-	-	-	-	-	-	-	-		-	-	-	-	-	-	-
7	Non-financial undertakings	9,847.98	3,986.76	1,826.15	1,826.15	-	-	-	-	-	1,386.44	-	-	4,628.76	-			1,927.99
8	Loans and advances	9,769.34	3,918.34	1,826.15	1,826.15	-	-	-	-	-	1,386.44	-	-	4,628.76	-			1,927.99
9	Debt securities, including UoP	78.64	68.42	-	-	-	-	-	-	-	-	-	-	-	-	-		-
10	Equity instruments	-	-	-	-	-	-	-	-	-		-	-	-	-	-		-
11	Households	27,819.94	2,911.24	2,761.08	2,761.08	-	-		-		2,761.08	-	-	-	-	-		-
12	of which loans collateralised by residential immovable property	27,449.37	2,911.24	2,761.08	2,761.08	-	-		-		2,761.08	-	-	-	-	-		-
13	of which building renovation loans	-	-	-	-	-	-		-		-	-	-	-	-	-		-
14	of which motor vehicle loans	370.57	-	-	-	-	-				-	-	-	-	-	-		-
15	Local governments financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-
16	Housing financing	-	-	-	-	-		-	-		-	-	-	-	-	-		-
17	Other local government financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-
18	Collateral obtained by taking possession: residential and commercial immovable properties	45.64	-	-	-	-	-	-	-		-	-	-	-	-	-		-
19	Exposures included on a voluntary basis (3)	-	-	-	-	-		-			-	-	-	-	-	-		
20	Total GAR assets	50,121.24	7,179.44	4,622.04	4,621.88	0.16	-	-	-	-	4,147.52	-	-	14,478.62	-	-	-	1,943.92
21	Assets not covered for GAR calculation	175,225.01																
22	Central governments and Supranational issuers	77,889.55																
23	Central banks exposure	19,637.43																
24	Trading book	3,530.91																
25	Undertakings and entities not subject to CSRD	62,294.07																
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	59,278.71																
27	Loans and advances	58,755.92																
28	of which loans collateralised by commercial immovable property	15,818.04																
29	of which building renovation loans																	
30	Debt securities	475.00																
31	Equity instruments	47.78																
32	Non-EU country counterparties not subject to CSRD disclosure obligations	3,015.36																
33	Loans and advances	2,508.03																

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling				
					Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems				Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7(9)	Of which not assessed consid- ered nonmaterial by the credit institution (2)
					CCM	CCA	WTR	CE	PPC	BIO							
Stock/Flow (Million EUR)																	
34	Debt securities	506.69															
35	Equity instruments	0.64															
36	Derivatives	145.82															
37	On demand interbank loans	2,042.68															
38	Cash and cash-related assets	5,548.23															
39	Other categories of assets (e.g. Goodwill, commodities etc.)	4,136.32															
40	Total assets	225,346.25	7,194.44	4,622.04	4,621.88	0.16	-	-	-	-	4,147.52	-	-	14,478.62	-	-	1,943.92
Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments																	
41	Financial guarantees	1,225.38	75.91	25.26	25.26	-	-	-	-	-	-	-	-	1,200.12	-	-	-
42	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43	of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	of which equity instrument	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

- Explanatory notes:
- The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.
 - Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.
 - Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 2:

GAR sector information (Turnover)

Disclosure reference date/period 31.12.2025

A		b	c	d	e	f	g	h	i	j
Breakdown by sector - NACE 4 digits level (code and label)		Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO
1	H 49.50 Transport via pipeline	797.15	-	-	-	-	-	-	-	-
2	G 47.11 Non-specialised retail sale of predominately food, beverages or tobacco	709.84	-	-	-	-	-	-	-	-
3	C 29.10 Manufacture of motor vehicles	429.23	407.77	-	-	-	-	-	-	-
4	K 61.10 Wired, wireless, and satellite telecommunication activities	392.66	71.07	-	-	-	-	-	-	-
5	G 47.54 Retail sale of electrical household appliances	251.58	-	-	-	-	-	-	-	-
6	D 35.22 Distribution of gaseous fuels through mains	240.79	12.04	12.04	12.04	-	-	-	-	-
7	H 53.20 Other postal and courier activities	215.01	-	-	-	-	-	-	-	-
8	F 41.00 Construction of residential and non-residential buildings	199.55	-	-	-	-	-	-	-	-
9	C 24.42 Aluminium production	198.55	163.73	163.73	163.73	-	-	-	-	-
10	C 11.07 Manufacture of soft drinks and bottled waters	185.28	-	-	-	-	-	-	-	-
11	Nuclear activities (1)	-								
12	Fossil gas activities (2)	-								
13	Of which non-assessed exposures (3)	3,446.27								

(1) Referred to in Sections 4.26, 4.27 and 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(2) Referred to in Sections 4.29, 4.30 and 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(3) In accordance with Article 7(8) of this Regulation.

Explanatory notes:

- Credit institutions shall disclose in this template information on top ten exposures in the banking book towards top ten sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.
- The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

GAR – Informații pe sectoare (CapEx)

Disclosure reference date/period 31.12.2025

A	b	c	d	e	f	g	h	i	j
Breakdown by sector - NACE 4 digits level (code and label)	Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO
1 H 49.50 Transport via pipeline	797.15	779.86	-	-	-	-	-	-	-
2 G 47.11 Non-specialised retail sale of predominately food, beverages or tobacco	709.84	-	-	-	-	-	-	-	-
3 C 29.10 Manufacture of motor vehicles	429.23	412.06	-	-	-	-	-	-	-
4 K 61.10 Wired, wireless, and satellite telecommunication activities	392.66	173.16	-	-	-	-	-	-	-
5 G 47.54 Retail sale of electrical household appliances	251.58	-	-	-	-	-	-	-	-
6 D 35.22 Distribution of gaseous fuels through mains	240.79	223.94	223.94	223.94	-	-	-	-	-
7 H 53.20 Other postal and courier activities	215.01	-	-	-	-	-	-	-	-
8 F 41.00 Construction of residential and non-residential buildings	199.55	-	-	-	-	-	-	-	-
9 C 24.42 Aluminium production	198.55	70.63	70.63	70.63	-	-	-	-	-
10 C 11.07 Manufacture of soft drinks and bottled waters	185.28	-	-	-	-	-	-	-	-
11 Nuclear activities (1)	-								
12 Fossil gas activities (2)	-								
13 Of which non-assessed exposures (3)	3,421.38								

(1) Referred to in Sections 4.26, 4.27 and 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(2) Referred to in Sections 4.29, 4.30 and 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(3) In accordance with Article 7(8) of this Regulation.

Explanatory notes:

- Credit institutions shall disclose in this template information on top ten exposures in the banking book towards top ten sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.
- The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 3: GAR KPI stock (Turnover)

Disclosure reference date 31.12.2025

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
		Climate Change Mitigation		Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems						
		CCM		CCA	WTR	CE	PPC	BIO						
1	GAR – Covered assets in both numerator and denominator													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	11.98%	9.07%	9.07%	-	-	-	-	-	8.28%	-	-	75.71%	29.07%
3	Financial undertakings	2.64%	0.26%	0.26%	-	-	-	-	-	-	-	-	9.96%	97.61%
4	Loans and advances	3.30%	0.24%	0.24%	-	-	-	-	-	-	-	-	7.38%	99.76%
5	Debt securities, including UoP	0.70%	0.35%	0.35%	-	-	-	-	-	-	-	-	50.00%	99.65%
6	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
7	Non-financial undertakings	28.68%	17.83%	17.83%	-	-	-	-	-	14.08%	-	-	62.18%	47.71%
8	Loans and advances	28.39%	17.97%	18.09%	-	-	-	-	-	14.19%	-	-	63.31%	48.10%
9	Debt securities, including UoP	64.00%	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
11	Households	10.46%	9.92%	9.92%	-		-			9.92%	-	-	94.84%	-
12	of which loans collateralised by residential immovable property	10.61%	10.06%	10.06%	-		-			10.06%	-	-	94.84%	-
13	of which building renovation loans	-	-	-	-		-			-	-	-	-	-
14	of which motor vehicle loans	-	-	-						-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-		-			-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-		-			-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-		-			-	-	-	-	
20	Total GAR assets	11.97%	9.07%	9.07%	-	-	-	-	-	8.27%	-	-	75.71%	29.04%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on stock of exposures calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

GAR KPI stock (CapEx)

Disclosure reference date 31.12.2025

	a	b	c	d	e	f	g	h	i	j	k	l	m
	Taxonomy-eligible	Taxonomy-aligned	Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
% (compared to corresponding total covered assets in the denominator)													
1	GAR – Covered assets in both numerator and denominator												
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	14.34%	9.23%	9.23%	-	-	-	-	8.28%	-	-	64.38%	28.89%
3	Financial undertakings	2.79%	0.34%	0.34%	-	-	-	-	-	-	-	12.37%	97.53%
4	Loans and advances	3.40%	0.30%	0.30%	-	-	-	-	-	-	-	8.82%	97.53%
5	Debt securities, including UoP	1.05%	0.52%	0.52%	-	-	-	-	-	-	-	50.00%	99.70%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	0.00%
7	Non-financial undertakings	40.60%	18.54%	18.54%	-	-	-	-	14.08%	-	-	45.81%	47.00%
8	Loans and advances	40.22%	18.69%	18.69%	-	-	-	-	14.19%	-	-	46.61%	47.38%
9	Debt securities, including UoP	87.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
11	Households	10.46%	9.92%	9.92%	-	-	-	-	9.92%	-	-	94.84%	-
12	of which loans collateralised by residential immovable property	10.61%	10.06%	10.06%	-	-	-	-	10.06%	-	-	94.84%	-
13	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-
14	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-	-	-	-	-	-	-	-	-
20	Total GAR assets	14.32%	9.22%	9.22%	-	-	-	-	8.27%	-	-	64.38%	28.89%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on stock of exposures calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 4:

GAR KPI flow (Turnover)

Disclosure reference date 31.12.2025

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy-aligned in Taxonomy-eligible	Non-assessed exposures (%)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems					
				CCM	CCA	WTR	CE	PPC	BIO					
1	GAR – Covered assets in both numerator and denominator													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	19.31%	13.36%	7.84%	-	-	-	-	-	11.69%	-	-	69.19%	28.36%
3	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
7	Non-financial undertakings	32.89%	19.18%	19.18%	-	-	-	-	-	15.09%	-	-	58.31%	69.38%
8	Loans and advances	32.89%	19.18%	19.18%	-	-	-	-	-	15.09%	-	-	58.31%	69.38%
9	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
11	Households	10.72%	10.08%	-	-		-			10.08%	-	-	94.09%	-
12	of which loans collateralised by residential immovable property	11.05%	10.40%	-	-		-			10.40%	-	-	94.09%	-
13	of which building renovation loans	-	-	-	-		-			-	-	-	-	-
14	of which motor vehicle loans	-	-	-			-			-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-		-			-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-		-			-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-		-			-	-	-	-	
20	Total GAR assets	19.24%	13.31%	7.81%	-	-	-	-	-	11.65%	-	-	69.19%	28.24%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on flow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

GAR KPI flow (CapEx)

Disclosure reference date 31.12.2025

%	(compared to corresponding total covered assets in the denominator)	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy-aligned in Taxonomy-eligible	Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems					
				CCM	CCA	WTR	CE	PPC	BIO					
1	GAR – Covered assets in both numerator and denominator													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	23.35%	13.46%	13.46%	-	-	-	-	-	11.69%	-	-	57.65%	28.36%
3	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Non-financial undertakings	42.75%	19.41%	19.41%	-	-	-	-	-	15.09%	-	-	45.41%	69.38%
8	Loans and advances	42.75%	19.41%	19.41%	-	-	-	-	-	15.09%	-	-	45.41%	69.38%
9	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Households	10.72%	10.08%	10.08%	-	-	-	-	-	10.08%	-	-	94.09%	-
12	of which loans collateralised by residential immovable property	11.05%	10.40%	10.40%	-	-	-	-	-	10.40%	-	-	94.09%	-
13	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
14	of which motor vehicle loans	0.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Total GAR assets	23.25%	13.41%	13.41%	-	-	-	-	-	11.65%	-	-	57.65%	28.24%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on flow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 5

KPI off-balance sheet exposures -stock (Turnover)

Disclosure reference date 31.12.2025

(compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective									Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems	Of which Use of Proceeds	Of which transitional	Of which enabling	
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	1.70%	1.63%	1.63%	-	-	-	-	-	-	-	-	98.37%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

KPI off-balance sheet exposures -stock (CapEx)

Disclosure reference date 31.12.2025

% (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective									Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems	Of which Use of Proceeds	Of which transitional	Of which enabling	
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	6.19%	2.06%	2.06%	-	-	-	-	-	-	-	-	97.94%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8) of this Regulation.

Explanatory notes:

- 1. Institutions shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets.
- 2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures.
- 3. Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

KPI off-balance sheet exposures -flow (Turnover)

Disclosure reference date 31.12.2025

% (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems				
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	0.13%	0.04%	0.04%	0.00%	0.00%	-	-	-	-	-	-	99.96%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

KPI off-balance sheet exposures -flow (CapEx)

Disclosure reference date 31.12.2025

% (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems				
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	4.64%	0.38%	0.38%	-	-	-	-	-	-	-	-	98.37%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8) of this Regulation.

Explanatory notes:

- 1. Institutions shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets.
- 2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures.
- 3. Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

1. Assets for the calculation of GAR (Turnover)

Million RON		Total [gross] carrying amount	Year End at 31.12.2024																																
			Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
			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 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				
	GAR - Covered assets in both numerator and denominator																																		
1	Loan and advances, debt securities and equity instruments not HFT eligible for GAR calculation	52,992.93	5,198.49	2,558.77	2,543.82	-	93.06	1,772.96	11.50	-	-	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	9,024.32	2,558.77	2,543.82	-	93.06
2	Financial undertakings	12,762.87	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
3	Credit institutions	9,586.54	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4	Loans and advances	7,352.93	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	Debt securities, including UoP	2,233.14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	Equity instruments	0.47	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	3,176.33	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	1,799.87	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
9	Loans and advances	3.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	1,647.68	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	Equity instruments	148.45	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance undertakings	66.47	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
17	Loans and advances	66.47	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	Non-financial undertakings	6,942.82	2,729.39	93.06	78.11	-	93.06	146.86	-	-	-	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	4,929.12	93.06	78.11	-	93.06
21	Loans and advances	6,868.84	2,655.42	93.06	78.11	-	93.06	146.86	-	-	-	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	4,929.12	93.06	78.11	-	93.06
22	Debt securities, including UoP	73.97	73.97	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
23	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	Households	25,998.75	2,465.71	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,465.71	2,465.71	2,465.71	-	-	
25	of which loans collateralized by residential immovable property	25,905.83	2,465.71	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,465.71	2,465.71	2,465.71	-	-	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
27	of which motor vehicle loans	92.92	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
28	Local governments financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	41.46	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	53,492.12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
33	Financial and non-financial undertakings	41,632.21																																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	39,157.49																																	
35	Loans and advances	39,127.71																																	
36	of which loans collateralised by commercial immovable property	11,275.74																																	
37	of which building renovation loans	-																																	

1. Assets for the calculation of GAR (Turnover)

		Total [gross] carrying amount	Year End at 31.12.2024																															
			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
			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 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						
Million RON																																		
38	Debt securities	-																																
39	Equity instruments	29.78																																
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,474.73																																
41	Loans and advances	1,490.99																																
42	Debt securities	584.30																																
43	Equity instruments	399.44																																
44	Derivatives	173.03																																
45	On demand interbank loans	2,422.20																																
46	Cash and cash-related assets	5,227.28																																
47	Other categories of assets (e.g. Goodwill, commodities etc.)	4,037.40																																
48	Total GAR assets	106,526.52	5,198.49	2,558.77	2,543.82	-	93.06	1,772.96	11.50	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	-	9,024.32	2,558.77	2,543.82	-	93.06
49	Assets not covered for GAR calculation	88,665.45																																
50	Central governments and Supranational issuers	67,996.60																																
51	Central banks exposure	17,087.07																																
52	Trading book	3,581.78																																
53	Total assets	195,191.97	5,198.49	2,558.77	2,543.82	-	93.06	1,772.96	11.50	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	-	9,024.32	2,558.77	2,543.82	-	93.06
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																		
54	Financial guarantees	720.70	198.53	714	714	-	714	21.64	-	-	-				183.98	-	-	-	-	-	-	-	-	-	-	-	-	-	404.15	714	714	-	714	
55	Assets under management	-	-	-	-	-	-	-	-	-	-				-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-				-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-				-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

1. Assets for the calculation of GAR (CapEx)

Million RON		Total [gross] carrying amount	Year End at 31.12.2024																													
			Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
			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 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	Loan and advances, debt securities and equity instruments not HFT eligible for GAR calculation	52,992.93	5,670.37	2,835.45	2,543.82	-	369.73	1,772.96	11.50	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	9,553.48	2,836.00	2,543.82	-	370.29		
2	Financial undertakings	12,762.87	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
3	Credit institutions	9,586.54	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4	Loans and advances	7,352.93	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	Debt securities, including UoP	2,233.14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	Equity instruments	0.47	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	3,176.33	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
8	of which investment firms	1,799.87	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
9	Loans and advances	3.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	1,647.68	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	Equity instruments	148.45	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance undertakings	66.47	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
17	Loans and advances	66.47	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	Non-financial undertakings	6,942.82	3,201.27	369.73	78.11	-	369.73	146.86	-	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	5,458.28	370.29	78.11	-	370.29		
21	Loans and advances	6,868.84	3,127.30	369.73	78.11	-	369.73	146.86	-	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	5,458.28	370.29	78.11	-	370.29		
22	Debt securities, including UoP	73.97	73.97	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	Households	25,998.75	2,465.71	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,465.71	2,465.71	2,465.71	-	-			
25	of which loans collateralized by residential immovable property	25,905.83	2,465.74	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,465.71	2,465.71	2,465.71	-	-			
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
27	of which motor vehicle loans	92.92	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
28	Local governments financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-	-		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-	-		
31	Collateral obtained by taking possession: residential and commercial immovable properties	41.46	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	53,492.12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
33	Financial and non-financial undertakings	41,632.21																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	39,157.49																														
35	Loans and advances	39,127.71																														
36	of which loans collateralised by commercial immovable property	11,275.74																														
37	of which building renovation loans	-																														

1. Assets for the calculation of GAR (CapEx)

		Total [gross] carrying amount	Year End at 31.12.2024																												
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible) Of which environmentally sustainable (Taxonomy-aligned)					Of which towards taxonomy relevant sectors (Taxonomy-eligible) Of which environmentally sustainable (Taxonomy-aligned)				Of which towards taxonomy relevant sectors (Taxonomy-eligible) Of which environmentally sustainable (Taxonomy-aligned)				Of which towards taxonomy relevant sectors (Taxonomy-eligible) Of which environmentally sustainable (Taxonomy-aligned)				Of which towards taxonomy relevant sectors (Taxonomy-eligible) Of which environmentally sustainable (Taxonomy-aligned)				Of which towards taxonomy relevant sectors (Taxonomy-eligible) 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 enabling	Of which Use of Proceeds	Of which transitional	Of which enabling			
Million RON																															
38	Debt securities	-																													
39	Equity instruments	29.78																													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,474.73																													
41	Loans and advances	1,490.99																													
42	Debt securities	584.30																													
43	Equity instruments	399.44																													
44	Derivatives	173.03																													
45	On demand interbank loans	2,422.20																													
46	Cash and cash-related assets	5,227.28																													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	4,037.40																													
48	Total GAR assets	106,526.52	5,670.37	2,835.45	2,543.82	-	369.73	1,772.96	11.50	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	9,553.48	2,836.00	2,543.82	-	370.29	
49	Assets not covered for GAR calculation	88,665.45																													
50	Central governments and Supranational issuers	67,996.60																													
51	Central banks exposure	17,087.07																													
52	Trading book	3,581.78																													
53	Total assets	195,191.97	5,670.37	2,835.45	2,543.82	-	369.73	1,772.96	11.50	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	9,553.48	2,836.00	2,543.82	-	370.29	
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	720.70	252.98	63.36	1.85	-	63.36	21.64	-	-	-	-	-	185.01	-	-	-	-	-	-	-	-	-	-	-	459.64	63.36	1.85	-	63.36	
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	C 2910 Manufacture of motor vehicles	288.41	-			-	-			-	-			-	-			-	-			-	-			288.41	-		
2	F 4120 Construction of residential and non-residential buildings	245.06	-			-	-			-	-			-	-			-	-			-	-			245.06	-		
3	D 3522 Distribution of gaseous fuels through mains	237.12	-			-	-			-	-			-	-			-	-			-	-			237.12	-		
4	D 3523 Trade of gas through mains	228.09	78.11			-	-			-	-			-	-			-	-			-	-			228.09	78.11		
5	C 2442 Aluminium production	203.51	-			-	-			-	-			-	-			-	-			-	-			203.51	-		
6	C 2751 Manufacture of electric domestic appliances	194.85	-			-	-			-	-			-	-			-	-			-	-			194.85	-		
7	H 5320 Other postal and courier activities	183.82	-			-	-			-	-			-	-			-	-			-	-			183.82	-		
8	D 3514 Trade of electricity	1.13	-			-	-			-	-			-	-			-	-			-	-			1.13	-		
9	D 3513 Distribution of electricity	95.34	14.95			-	-			-	-			-	-			-	-			-	-			95.34	14.95		
10	C 2221 Manufacture of plastic plates, sheets, tubes and profiles	134.50	-			-	-			-	-			-	-			-	-			-	-			134.50	-		
11	C 2361 Manufacture of concrete products for construction purposes	127.36	-			-	-			-	-			-	-			-	-			-	-			127.36	-		
12	N 7711 Renting and leasing of cars and light motor vehicles	124.95	-			-	-			-	-			-	-			-	-			-	-			124.95	-		
13	J 6110 Wired telecommunications activities	124.33	-			-	-			-	-			-	-			-	-			-	-			124.33	-		
14	C 2223 Manufacture of builders' ware of plastic	85.81	-			-	-			-	-			-	-			-	-			-	-			85.81	-		
15	J 6120 Wireless telecommunications activities	0.55	-			-	-			-	-			-	-			-	-			-	-			0.55	-		
16	C 3020 Manufacture of railway locomotives and rolling stock	55.89	-			-	-			-	-			-	-			-	-			-	-			55.89	-		
17	C 2511 Manufacture of metal structures and parts of structures	49.98	-			-	-			-	-			-	-			-	-			-	-			49.98	-		
18	H 5110 Passenger air transport	43.62	-			-	-			-	-			-	-			-	-			-	-			43.62	-		
19	C 2932 Manufacture of other parts and accessories for motor vehicles	41.63	-			-	-			-	-			147.01	-			-	-			-	-			188.64	-		
20	H 4920 Freight rail transport	36.25	-			-	-			-	-			-	-			-	-			-	-			36.25	-		
21	C 2732 Manufacture of other electronic and electric wires and cables	34.93	-			-	-			-	-			-	-			-	-			-	-			34.93	-		
22	C 2363 Manufacture of ready-mixed concrete	22.72	-			-	-			-	-			-	-			-	-			-	-			22.72	-		
23	E 3811 Collection of non-hazardous waste	16.43	-			-	-			-	-			-0.01	-			-	-			-	-			16.42	-		
24	C 2612 Manufacture of loaded electronic boards	15.89	-			-	-			-	-			-	-			-	-			-	-			15.89	-		
25	C 2015 Manufacture of fertilisers and nitrogen compounds	15.55	-			-	-			-	-			-	-			-	-			-	-			15.55	-		
26	H 5224 Cargo handling	0.15	-			-	-			-	-			-	-			-	-			-	-			0.15	-		
27	F 4321 Electrical installation	7.73	-			-	-			-	-			-	-			-	-			-	-			7.73	-		
28	E 3600 Water collection, treatment and supply	6.42	-			-	-			-	-			-	-			-	-			-	-			6.42	-		
29	C 3030 Manufacture of air and spacecraft and related machinery	5.86	-			-	-			-	-			-	-			-	-			-	-			5.86	-		
30	C 2341 Manufacture of ceramic household and ornamental articles	4.86	-			-	-			-	-			-	-			-	-			-	-			4.86	-		
31	H 4931 Urban and suburban passenger land transport	4.65	-			-	-			-	-			-	-			-	-			-	-			4.65	-		
32	C 2815 Manufacture of bearings, gears, gearing and driving elements	3.24	-			-	-			-	-			-	-			-	-			-	-			3.24	-		
33	M 7120 Technical testing and analysis	3.16	-			-	-			-	-			-	-			-	-			-	-			3.16	-		
34	M 7112 Engineering activities and related technical consultancy	3.08	-			-	-			-	-			-	-			-	-			-	-			3.08	-		
35	F 4222 Construction of utility projects for electricity and telecommunications	2.26	-			-	-			-	-			-	-			-	-			-	-			2.26	-		

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
36	L 6832 Management of real estate on a fee or contract basis	1.44	-			-	-			-	-			-	-			-	-			-	-			1.44	-		
37	H 4910 Passenger rail transport, interurban	1.05	-			-	-			-	-			-	-			-	-			-	-			1.05	-		
38	C 2572 Manufacture of locks and hinges	0.96	-			-	-			-	-			-	-			-	-			-	-			0.96	-		
39	C 2351 Manufacture of cement	0.93	-			-	-			-	-			-	-			-	-			-	-			0.93	-		
40	C 2420 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.70	-			-	-			-	-			-	-			-	-			-	-			0.70	-		
41	C 2611 Manufacture of electronic components	0.69	-			-	-			-	-			-	-			-	-			-	-			0.69	-		
42	J 6311 Data processing, hosting and related activities	0.23	-			-	-			-	-			-	-			-	-			-	-			0.23	-		
43	C 2813 Manufacture of other pumps and compressors	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
44	C 2229 Manufacture of other plastic products	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
45	H 4941 Freight transport by road	0.18	-			-	-			-	-			-	-			-	-			-	-			0.18	-		
46	C 3011 Building of ships and floating structures	0.16	-			-	-			-	-			-	-			-	-			-	-			0.16	-		
47	C 2550 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0.12	-			-	-			-	-			-	-			-	-			-	-			0.12	-		
48	C 2931 Manufacture of electrical and electronic equipment for motor vehicles	0.09	-			-	-			-	-			-	-			-	-			-	-			0.09	-		
49	F 4211 Construction of roads and motorways	0.07	-			142.47	-			-	-			-	-			-	-			-	-			142.54	-		
50	F 4299 Construction of other civil engineering projects nec	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
51	C 2825 Manufacture of non-domestic cooling and ventilation equipment	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
52	C 3317 Repair and maintenance of other transport equipment	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
53	D 3511 Production of electricity	-0.72	-			-	-			-	-			-	-			-	-			-	-			-0.72	-		
54	H 5310 Postal activities under universal service obligation	-0.05	-			-	-			-	-			-	-			-	-			-	-			-0.05	-		
55	B 0910 Support activities for petroleum and natural gas extraction	-	-			2.36	-			-	-			-	-			-	-			-	-			2.36	-		
56	C 1011 Processing and preserving of meat	-	-			-	-			-	-			31.67	-			-	-			-	-			31.67	-		
57	C 1012 Processing and preserving of poultry meat	-	-			-	-			-	-			86.64	-			-	-			-	-			86.64	-		
58	C 1013 Production of meat and poultry meat products	-	-			-	-			-	-			22.38	-			-	-			-	-			22.38	-		
59	C 1061 Manufacture of grain mill products	-	-			-	-			-	-			13.25	-			-	-			-	-			13.25	-		
60	C 1071 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-			-	-			-	-			0.41	-			-	-			-	-			0.41	-		
61	C 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	-	-			-	-			-	-			10.49	-			-	-			-	-			10.49	-		
62	C 1105 Manufacture of beer	-	-			-	-			-	-			2.79	-			-	-			-	-			2.79	-		
63	C 1107 Manufacture of tobacco products	-	-			-	-			-	-			168.86	-			-	-			-	-			168.86	-		
64	C 1413 Manufacture of other outerwear	-	-			-	-			-	-			0.60	-			-	-			-	-			0.60	-		
65	C 1520 Manufacture of footwear	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
66	C 1712 Manufacture of paper and paperboard	-	-			-	-			-	-			23.41	-			-	-			-	-			23.41	-		
67	C 2110 Manufacture of basic pharmaceutical products	-	-			-	-			-	-			-	-			33.74	-			-	-			33.74	-		
68	C 2120 Manufacture of pharmaceutical preparations	-	-			-	-			-	-			-	-			0.33	-			-	-			0.33	-		
69	C 3102 Manufacture of kitchen furniture	-	-			-	-			-	-			8.10	-			-	-			-	-			8.10	-		

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
70	C 3109 Manufacture of other furniture	-	-			-	-			-	-			23.70	-			-	-			-	-			23.70	-		
71	G 4621 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-			-	-			-	-			1.05	-			-	-			-	-			1.05	-		
72	G 4635 Wholesale of tobacco products	-	-			-	-			-	-			2.78	-			-	-			-	-			2.78	-		
73	G 4639 Non-specialised wholesale of food, beverages and tobacco	-	-			-	-			-	-			24.85	-			-	-			-	-			24.85	-		
74	G 4645 Wholesale of perfume and cosmetics	-	-			-	-			-	-			-0.04	-			-	-			-	-			-0.04	-		
75	G 4646 Wholesale of pharmaceutical goods	-	-			-	-			-	-			1.87	-			-	-			-	-			1.87	-		
76	G 4671 Wholesale of solid, liquid and gaseous fuels and related products	-	-			-	-			-	-			0.26	-			-	-			-	-			0.26	-		
77	G 4673 Wholesale of wood, construction materials and sanitary equipment	-	-			-	-			-	-			0.49	-			-	-			-	-			0.49	-		
78	G 4674 Wholesale of hardware, plumbing and heating equipment and supplies	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
79	G 4677 Wholesale of waste and scrap	-	-			-	-			-	-			2.96	-			-	-			-	-			2.96	-		
80	G 4690 Non-specialised wholesale trade	-	-			-	-			-	-			10.11	-			-	-			-	-			10.11	-		
81	G 4711 Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-			-	-			-	-			1,327.05	-			-	-			-	-			1,327.05	-		
82	G 4719 Other retail sale in non-specialised stores	-	-			-	-			-	-			0.66	-			-	-			-	-			0.66	-		
83	G 4742 Retail sale of telecommunications equipment in specialised stores	-	-			-	-			-	-			0.37	-			-	-			-	-			0.37	-		
84	G 4752 Retail sale of hardware, paints and glass in specialised stores	-	-			-	-			-	-			42.06	-			-	-			-	-			42.06	-		
85	G 4754 Retail sale of electrical household appliances in specialised stores	-	-			-	-			-	-			92.57	-			-	-			-	-			92.57	-		
86	G 4764 Retail sale of sporting equipment in specialised stores	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
87	G 4773 Dispensing chemist in specialised stores	-	-			-	-			-	-			1.25	-			-	-			-	-			1.25	-		
88	G 4778 Other retail sale of new goods in specialised stores	-	-			-	-			-	-			0.36	-			-	-			-	-			0.36	-		
89	I 5510 Hotels and similar accommodation	-	-			-	-			-	-			2.45	-			-	-			-	-			2.45	-		
90	O 8425 Fire service activities	-	-			-	-			-	-			-	-			-	-			42.39	-			42.39	-		
91	Q 8690 Other human health activities	-	-			1.03	-			-	-			-	-			-	-			-	-			1.03	-		
92	G 4775 Retail sale of cosmetic and toilet articles in specialised stores	-	-			1.00	-			-	-			-	-			-	-			-	-			1.00	-		
93	H 4950 Transport via pipeline	-	-			-	-			-	-			-	-			-	-			-	-			0.00	-		

2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		
1	H 4950 Transport via pipeline	519.03	276.21			-	-			-	-			-	-			-	-			-	-			519.03	276.21		
2	C 2910 Manufacture of motor vehicles	288.41	-			-	-			-	-			-	-			-	-			-	-			288.41	-		
3	F 4120 Construction of residential and non-residential buildings	245.06	-			-	-			-	-			-	-			-	-			-	-			245.06	-		
4	D 3522 Distribution of gaseous fuels through mains	237.15	0.04			-	-			-	-			-	-			-	-			-	-			237.15	0.04		
5	D 3523 Trade of gas through mains	228.09	78.11			-	-			-	-			-	-			-	-			-	-			228.09	78.11		
6	C 2442 Aluminium production	159.11	-			-	-			-	-			-	-			-	-			-	-			159.11	-		
7	C 2751 Manufacture of electric domestic appliances	194.85	-			-	-			-	-			-	-			-	-			-	-			194.85	-		
8	H 5320 Other postal and courier activities	183.82	-			-	-			-	-			-	-			-	-			-	-			183.82	-		
9	D 3514 Trade of electricity	2.42	-			-	-			-	-			-	-			-	-			-	-			2.42	-		
10	D 3513 Distribution of electricity	84.20	15.39			-	-			-	-			-	-			-	-			-	-			84.20	15.39		
11	C 2221 Manufacture of plastic plates, sheets, tubes and profiles	134.50	-			-	-			-	-			-	-			-	-			-	-			134.50	-		
12	C 2361 Manufacture of concrete products for construction purposes	127.36	-			-	-			-	-			-	-			-	-			-	-			127.36	-		
13	N 7711 Renting and leasing of cars and light motor vehicles	124.95	-			-	-			-	-			-	-			-	-			-	-			124.95	-		
14	J 6110 Wired telecommunications activities	124.33	-			-	-			-	-			-	-			-	-			-	-			124.33	-		
15	C 2223 Manufacture of builders' ware of plastic	85.81	-			-	-			-	-			-	-			-	-			-	-			85.81	-		
16	J 6120 Wireless telecommunications activities	0.16	-			-	-			-	-			-	-			-	-			-	-			0.16	-		
17	C 3020 Manufacture of railway locomotives and rolling stock	55.89	-			-	-			-	-			-	-			-	-			-	-			55.89	-		
18	C 2511 Manufacture of metal structures and parts of structures	49.98	-			-	-			-	-			-	-			-	-			-	-			49.98	-		
19	H 5110 Passenger air transport	43.62	-			-	-			-	-			-	-			-	-			-	-			43.62	-		
20	C 2832 Manufacture of other parts and accessories for motor vehicles	41.63	-			-	-			-	-			147.01	-			-	-			-	-			188.64	-		
21	H 4920 Freight rail transport	36.25	-			-	-			-	-			-	-			-	-			-	-			36.25	-		
22	C 2732 Manufacture of other electronic and electric wires and cables	34.93	-			-	-			-	-			-	-			-	-			-	-			34.93	-		
23	C 2363 Manufacture of ready-mixed concrete	22.72	-			-	-			-	-			-	-			-	-			-	-			22.72	-		
24	E 3811 Collection of non-hazardous waste	16.43	-			-	-			-	-			(0.01)	-			-	-			-	-			16.42	-		
25	C 2612 Manufacture of loaded electronic boards	15.89	-			-	-			-	-			-	-			-	-			-	-			15.89	-		
26	C 2015 Manufacture of fertilisers and nitrogen compounds	15.55	-			-	-			-	-			-	-			-	-			-	-			15.55	-		
27	H 5224 Cargo handling	7.60	-			-	-			-	-			-	-			-	-			-	-			7.60	-		
28	F 4321 Electrical installation	7.73	-			-	-			-	-			-	-			-	-			-	-			7.73	-		
29	E 3600 Water collection, treatment and supply	6.42	-			-	-			-	-			-	-			-	-			-	-			6.42	-		
30	C 3030 Manufacture of air and spacecraft and related machinery	5.86	-			-	-			-	-			-	-			-	-			-	-			5.86	-		
31	C 2341 Manufacture of ceramic household and ornamental articles	4.86	-			-	-			-	-			-	-			-	-			-	-			4.86	-		
32	H 4931 Urban and suburban passenger land transport	4.65	-			-	-			-	-			-	-			-	-			-	-			4.65	-		
33	C 2815 Manufacture of bearings, gears, gearing and driving elements	3.24	-			-	-			-	-			-	-			-	-			-	-			3.24	-		
34	M 7120 Technical testing and analysis	3.16	-			-	-			-	-			-	-			-	-			-	-			3.16	-		
35	M 7112 Engineering activities and related technical consultancy	3.08	-			-	-			-	-			-	-			-	-			-	-			3.08	-		
36	F 4222 Construction of utility projects for electricity and telecommunications	2.26	-			-	-			-	-			-	-			-	-			-	-			2.26	-		

2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
37	L 6832 Management of real estate on a fee or contract basis	1.44	-			-	-			-	-			-	-			-	-			-	-			1.44	-		
38	H 4910 Passenger rail transport, interurban	1.05	-			-	-			-	-			-	-			-	-			-	-			1.05	-		
39	C 2572 Manufacture of locks and hinges	0.96	-			-	-			-	-			-	-			-	-			-	-			0.96	-		
40	C 2351 Manufacture of cement	0.93	-			-	-			-	-			-	-			-	-			-	-			0.93	-		
41	C 2420 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.70	-			-	-			-	-			-	-			-	-			-	-			0.70	-		
42	C 2611 Manufacture of electronic components	0.69	-			-	-			-	-			-	-			-	-			-	-			0.69	-		
43	J 6311 Data processing, hosting and related activities	0.23	-			-	-			-	-			-	-			-	-			-	-			0.23	-		
44	C 2813 Manufacture of other pumps and compressors	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
45	C 2229 Manufacture of other plastic products	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
46	H 4941 Freight transport by road	0.18	-			-	-			-	-			-	-			-	-			-	-			0.18	-		
47	C 3011 Building of ships and floating structures	0.16	-			-	-			-	-			-	-			-	-			-	-			0.16	-		
48	C 2550 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0.12	-			-	-			-	-			-	-			-	-			-	-			0.12	-		
49	C 2931 Manufacture of electrical and electronic equipment for motor vehicles	0.09	-			142.47	-			-	-			-	-			-	-			-	-			142.56	-		
50	F 4211 Construction of roads and motorways	0.07	-			-	-			-	-			-	-			-	-			-	-			0.07	-		
51	F 4299 Construction of other civil engineering projects n.e.c.	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
52	C 2825 Manufacture of non-domestic cooling and ventilation equipment	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
53	C 3317 Repair and maintenance of other transport equipment	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
54	D 3511 Production of electricity	-0.72	-			-	-			-	-			-	-			-	-			-	-			-0.72	-		
55	H 5310 Postal activities under universal service obligation	-0.05	-			2.36	-			-	-			-	-			-	-			-	-			2.31	-		
56	B 0910 Support activities for petroleum and natural gas extraction	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
57	C 1011 Processing and preserving of meat	-	-			-	-			-	-			31.67	-			-	-			-	-			31.67	-		
58	C 1012 Processing and preserving of poultry meat	-	-			-	-			-	-			86.64	-			-	-			-	-			86.64	-		
59	C 1013 Production of meat and poultry meat products	-	-			-	-			-	-			22.38	-			-	-			-	-			22.38	-		
60	C 1061 Manufacture of grain mill products	-	-			-	-			-	-			13.25	-			-	-			-	-			13.25	-		
61	C 1071 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-			-	-			-	-			0.41	-			-	-			-	-			0.41	-		
62	C 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	-	-			-	-			-	-			10.49	-			-	-			-	-			10.49	-		
63	C 1105 Manufacture of beer	-	-			-	-			-	-			2.79	-			-	-			-	-			2.79	-		
64	C 1107 Manufacture of tobacco products	-	-			-	-			-	-			168.86	-			-	-			-	-			168.86	-		
65	C 1413 Manufacture of other outerwear	-	-			-	-			-	-			0.60	-			-	-			-	-			0.60	-		
66	C 1520 Manufacture of footwear	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
67	C 1712 Manufacture of paper and paperboard	-	-			-	-			-	-			23.41	-			-	-			-	-			23.41	-		
68	C 2110 Manufacture of basic pharmaceutical products	-	-			-	-			-	-			-	-			33.74	-			-	-			33.74	-		
69	C 2120 Manufacture of pharmaceutical preparations	-	-			-	-			-	-			-	-			0.33	-			-	-			0.33	-		
70	C 3102 Manufacture of kitchen furniture	-	-			-	-			-	-			8.10	-			-	-			-	-			8.10	-		

2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		
71	C 3109 Manufacture of other furniture	-	-			-	-			-	-			23.70	-			-	-			-	-			23.70	-		
72	G 4621 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-			-	-			-	-			1.05	-			-	-			-	-			1.05	-		
73	G 4635 Wholesale of tobacco products	-	-			-	-			-	-			2.78	-			-	-			-	-			2.78	-		
74	G 4639 Non-specialised wholesale of food, beverages and tobacco	-	-			-	-			-	-			24.85	-			-	-			-	-			24.85	-		
75	G 4645 Wholesale of perfume and cosmetics	-	-			-	-			-	-			-0.04	-			-	-			-	-			-0.04	-		
76	G 4646 Wholesale of pharmaceutical goods	-	-			-	-			-	-			2.18	-			-	-			-	-			2.18	-		
77	G 4671 Wholesale of solid, liquid and gaseous fuels and related products	-	-			-	-			-	-			0.26	-			-	-			-	-			0.26	-		
78	G 4673 Wholesale of wood, construction materials and sanitary equipment	-	-			-	-			-	-			0.49	-			-	-			-	-			0.49	-		
79	G 4674 Wholesale of hardware, plumbing and heating equipment and supplies	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
80	G 4677 Wholesale of waste and scrap	-	-			-	-			-	-			2.96	-			-	-			-	-			2.96	-		
81	G 4690 Non-specialised wholesale trade	-	-			-	-			-	-			10.11	-			-	-			-	-			10.11	-		
82	G 4711 Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-			-	-			-	-			1,384.03	0.55			-	-			-	-			1,384.03	0.55		
83	G 4719 Other retail sale in non-specialised stores	-	-			-	-			-	-			0.66	-			-	-			-	-			0.66	-		
84	G 4742 Retail sale of telecommunications equipment in specialised stores	-	-			-	-			-	-			0.37	-			-	-			-	-			0.37	-		
85	G 4752 Retail sale of hardware, paints and glass in specialised stores	-	-			-	-			-	-			42.06	-			-	-			-	-			42.06	-		
86	G 4754 Retail sale of electrical household appliances in specialised stores	-	-			-	-			-	-			92.57	-			-	-			-	-			92.57	-		
87	G 4764 Retail sale of sporting equipment in specialised stores	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
88	G 4773 Dispensing chemist in specialised stores	-	-			-	-			-	-			1.25	-			-	-			-	-			1.25	-		
89	G 4778 Other retail sale of new goods in specialised stores	-	-			-	-			-	-			2.45	-			-	-			-	-			2.45	-		
90	I 5510 Hotels and similar accommodation	-	-			1.03	-			-	-			-	-			-	-			42.39	-			43.42	-		
91	O 8425 Fire service activities	-	-			1.00	-			-	-			-	-			-	-			-	-			1.00	-		
92	Q 8690 Other human health activities	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
93	G 4775 Retail sale of cosmetic and toilet articles in specialised stores	-	-			-	-			-	-			0.36	-			-	-			-	-			0.36	-		

3. GAR KPI concerning stock (Turnover)

		Year End at 31.12.2024																																			
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)														
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)																
Of which Use of Proceeds					Of which transitional				Of which enabling				Of which Use of Proceeds				Of which transitional				Of which enabling				Of which Use of Proceeds					Of which transitional				Of which enabling			
% (compared to total covered assets in the denominator)																																					
	GAR - Covered assets in both numerator and denominator																																				
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	9.81%	4.83%	4.80%	-	0.18%	3.35%	0.02%	-	-	-	-	-	3.87%	-	-	-	-	0.06%	-	-	-	-	0.08%	-	-	-	-	17.03%	4.83%	4.80%	-	0.18%	49.75%			
2	Financial undertakings	-	-	-	-	-	-	0.09%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11.98%					
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%					
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.90%					
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.10%					
6	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
7	Other financial corporations	-	-	-	-	-	-	0.36%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.98%					
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.69%					
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.55%					
11	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%					
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
15	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
16	of which insurance undertakings	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%					
17	Loans and advances	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%					
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
19	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
20	Non-financial undertakings	39.31%	1.34%	1.12%	-	1.34%	2.12%	-	-	-	-	-	-	29.53%	-	-	-	-	0.49%	-	-	-	-	0.61%	-	-	-	-	71.00%	1.34%	1.12%	-	1.34%	6.52%			
21	Loans and advances	38.66%	1.35%	1.14%	-	1.35%	2.14%	-	-	-	-	-	-	29.85%	-	-	-	-	0.50%	-	-	-	-	0.62%	-	-	-	-	71.76%	1.35%	1.14%	-	1.35%	6.45%			
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%					
23	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
24	Households	9.48%	9.48%	9.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.48%	9.48%	9.48%	-	-	24.41%					
25	of which loans collateralised by residential immovable property	9.52%	9.52%	9.52%	-	-	-	-	-					-	-	-	-									2.31%	2.31%	2.31%	-	-	24.32%						
26	of which building renovation loans	-	-	-	-	-	-	-	-					-	-	-	-									-	-	-	-	-	-	-					
27	of which motor vehicle loans	-	-	-	-	-																										0.09%					
28	Local governments financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%					
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-					
30	Other local government financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%					
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%					
32	Total GAR assets	4.88%	2.40%	2.39%	-	0.09%	1.66%	0.01%	-	-	-	-	-	1.92%	-	-	-	-	0.03%	-	-	-	-	0.04%	-	-	-	-	8.47%	2.40%	2.39%	-	0.09%	49.79%			

3. GAR KPI concerning stock (CapEx)

		Year End at 31.12.2024																																
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered		
																											Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-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)					% (compared to total covered assets in the denominator)				% (compared to total covered assets in the denominator)				% (compared to total covered assets in the denominator)				% (compared to total covered assets in the denominator)				% (compared to total covered assets in the denominator)				% (compared to total covered assets in the denominator)							
GAR - Covered assets in both numerator and denominator																																		
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	10.70%	5.35%	4.80%	-	0.70%	3.35%	0.02%	-	-	-	-	-	3.98%	-	-	-	-	0.06%	-	-	-	-	0.08%	-	-	-	-	18.03%	5.35%	4.80%	-	0.70%	49.75%
2	Financial undertakings	-	-	-	-	-	-	0.09%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11.98%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.90%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.10%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	0.36%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.98%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.69%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.55%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%	
17	Loans and advances	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	46.11%	5.33%	1.12%	-	5.33%	2.12%	-	-	-	-	-	-	30.36%	0.01%	-	0.01%	0.49%	-	-	-	-	0.61%	-	-	-	-	78.62%	5.33%	1.12%	-	5.33%	6.52%	
21	Loans and advances	45.53%	5.38%	1.14%	-	5.38%	2.14%	-	-	-	-	-	-	30.68%	0.01%	-	0.01%	0.50%	-	-	-	-	0.62%	-	-	-	-	79.46%	5.39%	1.14%	-	5.39%	6.45%	
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	9.48%	9.48%	9.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.48%	9.48%	9.48%	-	-	-	24.41%	
25	of which loans collateralised by residential immovable property	9.52%	9.52%	9.52%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.31%	2.31%	2.31%	-	-	-	24.32%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.09%	
28	Local governments financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%	
32	Total GAR assets	5.32%	2.66%	2.39%	-	0.35%	1.66%	0.01%	-	-	-	-	-	1.98%	-	-	-	-	0.03%	-	-	-	-	0.04%	-	-	-	8.97%	2.39%	2.39%	-	0.35%	49.79%	

4. GAR KPI regarding flow (Turnover)

		Year End at 31.12.2024																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
				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		Din care utilizarea fondurilor	Din care de tranzitie	Din care de facilitare		
% (compared to flow of total eligible assets)																																
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	25.60%	6.15%	5.36%	-	5.02%	8.18%	-	-	-	-	-	-	8.50%	-	-	-	-	0.43%	-	-	-	-	-	-	-	42.71%	6.15%	5.36%	-	5.02%	17.56%
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.78%	
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.32%	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.46%	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.59%	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.41%	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	-	-	0.11%
17	Loans and advances	-	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	-	-	0.11%
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	47.09%	9.67%	8.15%	-	9.67%	1.72%	-	-	-	-	-	-	16.37%	-	-	-	-	0.82%	-	-	-	-	-	-	-	66.00%	9.67%	8.15%	-	9.67%	13.48%
21	Loans and advances	46.94%	9.70%	8.17%	-	9.70%	1.72%	-	-	-	-	-	-	16.41%	-	-	-	-	0.82%	-	-	-	-	-	-	-	65.90%	9.70%	8.17%	-	9.70%	13.45%
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	-	0.04%
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	4.31%	4.31%	4.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.31%	4.31%	4.31%	-	-	6.80%	
25	of which loans collateralised by residential immovable property	4.46%	4.46%	4.46%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.46%	4.46%	4.46%	-	-	6.57%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.23%	
28	Local governments financing	0.21%	-	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	-	-	1.90%
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.21%	-	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	-	-	1.90%
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%	
32	Total GAR assets	6.65%	1.60%	1.39%	-	1.30%	2.12%	-	-	-	-	-	-	2.21%	-	-	-	-	0.11%	-	-	-	-	-	-	11.09%	1.60%	1.39%	0.00%	1.30%	26.08%	

4. GAR KPI regarding flow (CapEx)

[illegible]

5. KPI off-balance sheet exposures regarding stock (Turnover)

		Year End at 31.12.2024																							
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		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)			
		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			
1	Financial guarantees (FinGuar KPI)	27.55%	0.99%	0.99%	-	0.99%	3.00%	-	-	-	-	-	-	25.53%	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

5. KPI off-balance sheet exposures regarding stock (CapEx)

		Year End at 31.12.2024																							
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		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)			
		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			
1	Financial guarantees (FinGuar KPI)	35.10%	8.79%	0.26%	-	8.79%	3.00%	-	-	-	-	-	-	25.67%	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6. . KPI off-balance sheet exposures regarding flow (Turnover)

		Year End at 31.12.2024																												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Proportion of total 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 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				
1	Financial guarantees (FinGuar KPI)	24.94%	1.00%	0.44%	-	1.00%	0.01%	-	-	-	-	-	-	-	9.99%	-	-	-	-	-	-	-	-	-	34.94%	1.00%	0.44%	-	1.00%	
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

6. . KPI off-balance sheet exposures regarding flow (CapEx)

		Year End at 31.12.2024																													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total 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				
1	Financial guarantees (FinGuar KPI)	32.11%	67.11%	0.44%	-	67.11%	0.01%	-	-	-	-	-	-	10.24%	-	-	-	-	-	-	-	-	-	-	42.36%	67.11%	0.44%	-	67.11%		
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			

Anexa XII

Reporting period 31.12.2024

Template 1 Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
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.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
Row	Economic activities	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	-	-	-	-	-	-

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	-	-	-	-	-	-

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	22.8	100%	22.8	100%	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	22.8		22.8			

Template 5 Taxonomy non-eligible economic activities

Row	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
7	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-
8	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	-	-